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Part 2 of 2 of the questionnaire on the working document:
Preparatory study on textiles for product policy instruments - 3rd milestone

Fields marked with * are mandatory.

Introduction

Context of the questionnaire

Welcome to the **Part 2 of 2** of the questionnaire that will allow you to contribute to the development of the preparatory study on textile products.

Deadline for submission of answers and comments: **30 March 2026** at 23:59 CET.

On 16 December 2025, the Joint Research Centre (JRC) of the European Commission shared with all registered stakeholders the working document of the 3rd milestone.

On 14 and 15 January 2026, registered stakeholders and the JRC exchanged ideas during an online workshop about Tasks 4, 5 and 6 of the working document.

On 30 January, stakeholders received a PDF version of the questionnaire providing detailed information on the content and structure of all questions related to the working document of the 3rd milestone, on which the JRC would welcome feedback from stakeholders.

From 5 February to 30 March 2026, all registered stakeholders will be able to provide **written feedback** to the working document of the 3rd milestone via two dedicated EU Survey forms.

The consultation process enables the JRC to improve the work under development and the exchange with registered stakeholders aims to:

- verify the work done to date,
- collect additional evidence on the investigated topics.

Structure of the Part 2 of 2 of the questionnaire

Part 2 of 2 of the questionnaire has 7 sections:

1. Profile of the respondent
9. DO4 on environmental and carbon footprint
10. Combination of design options: paths
11. Chemical substances in textile products
12. Environmental and economic model
13. Questions related to future stages of the project
14. Other parts of the working document

The questionnaire is designed and implemented in a way that should enable stakeholders to easily identify the sections they wish to comment, allowing them to skip those sections which they do not wish to comment. Section 14 of Part 2 of 2 of the questionnaire further allows all registered stakeholders to provide up to 10 written comments to the working document on topics not otherwise specifically covered in the questionnaire. Should you wish to provide more than 10 comments, you are welcome to **submit more than one questionnaire**. If you wish to share a document to support your position further, you may do so by sending it via email to **JRC-B5-TEXTILES@ec.europa.eu**, clearly indicating if the submitted information should be treated as confidential. Please note that comments made in Section 14 of Part 2 of 2 of the questionnaire or documents sent via email should not reiterate or substitute the answers on topics asked in other sections of the questionnaire. We would be grateful if you can support the JRC in analysing the comments received by using to the maximum extent possible the structured questionnaire provided.

Confidentiality of personal data and information provided

Data and information collected via this questionnaire will be treated confidentially and complying with the Regulation on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data (Regulation (EU) 2018/1725).

Therefore, data will be treated for the development of EU policies on textiles, and it will be of the exclusive use of the European Commission. The European Commission will process data and information complying with the referred regulation. For more information, please visit the privacy statement under this link (processing of personal data for user management purposes) and this link (processing personal data within the survey itself).

1. Profile of the respondent

.

	First name	Last name	Email address
. *	Ingun Grimstad	Klepp	ingunk@oslomet.no

* Publication of information in my contribution

- (●) I **consent** to the publication, by the European Commission's JRC, of any information in my contribution, in whole or in part (which may include quotes or opinions I express), provided that the personal information submitted under "stakeholder information" is not disclosed. Publication of the information may include publication in aggregated or disaggregated form of your contributions in JRC intermediate deliverables or final reports that may be made publicly available via the JRC's project website.
- ( ) I do **not consent** to the publication of any information in my contribution.

[x] I guarantee that:

- My response does not infringe any intellectual property rights, including without limitation, copyright, database sui generis rights or trademark rights or any other third party rights;
- To the extent that my response contains materials from other sources (e.g., text, illustrations, graphs, tables), I have obtained written permission from the relevant copyright owners to include such materials in my response, in a way that allows the European Commission to publish my response;
- I can provide copies of any relevant written permissions/licences, at the request of the European Commission; If my response contains materials made available under an open licence (e.g. Creative Commons), I indicate the type of licence, together with the source and author's name, in my response;
- Nothing in my response is obscene, defamatory, violates any right of privacy or duty of confidentiality, infringes any other rights of any person or entity or is otherwise unlawful.

* 1.1 Name of the submitting organization

What is the name of the organization you represent in this questionnaire?

Text of 1 to 300 characters will be accepted

SIFO at Oslo Metropolitan University

* 1.2 Type of the organization

Select the type of organization you represent in this questionnaire:

- ( ) Government (e.g. Member States, regions, EU Ecolabel competent bodies, national and regional agencies, etc.)
- ( ) Textile industry
- ( ) Textile industrial association
- ( ) Waste management industry
- ( ) Waste management industry association
- ( ) Consumer organization
- ( ) Environmental Non-governmental organization (NGO)
- ( ) Other Non-governmental organization (NGO)
- (●) Research institutions, including universities
- ( ) Test laboratory
- ( ) Other

* 1.3 Country of the organization

Select the country of the organization you represent in this questionnaire:

- Afghanistan
- Albania
- Algeria
- Andorra
- Angola
- Antigua and Barbuda
- Argentina
- Armenia
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bhutan
- Bolivia
- Bosnia and Herzegovina
- Botswana
- Brazil
- Brunei Darussalam
- Bulgaria
- Burkina Faso
- Burundi
- Cabo Verde
- Cambodia
- Cameroon
- Canada
- Central African Republic
- Chad
- Chile
- China
- Colombia
- Comoros
- Congo
- Dominican Republic
- Ecuador
- Egypt
- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Fiji
- Finland
- France
- Gabon
- Gambia
- Georgia
- Germany
- Ghana
- Greece
- Grenada
- Guatemala
- Guinea
- Guinea Bissau
- Guyana
- Haiti
- Honduras
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Israel
- Italy
- Jamaica
- Japan
- Jordan
- Kazakhstan
- Kenya
- Lithuania
- Luxembourg
- Madagascar
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Mauritania
- Mauritius
- Mexico
- Micronesia
- Monaco
- Mongolia
- Montenegro
- Morocco
- Mozambique
- Myanmar
- Namibia
- Nauru
- Nepal
- Netherlands
- New Zealand
- Nicaragua
- Niger
- Nigeria
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Philippines
- Poland
- San Marino
- Sao Tome and Principe
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Sweden
- Switzerland
- Syrian Arab Republic
- Tajikistan
- Tanzania
- Thailand
- Timor-Leste
- Togo
- Tonga
- Trinidad and Tobago
- Tunisia
- Turkmenistan
- Tuvalu
- Türkiye
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States of America
- Uruguay

- Costa Rica
- Croatia
- Cuba
- Cyprus
- Czechia
- Côte D'Ivoire
- Democratic Republic of the Congo
- Denmark
- Djibouti
- Dominica
- Kiribati
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- Lesotho
- Liberia
- Libya
- Liechtenstein
- Portugal
- Qatar
- Republic of Moldova
- Romania
- Russian Federation
- Rwanda
- Saint Kitts and Nevis
- Saint Lucia
- Saint Vincent and the Grenadines
- Samoa
- Uzbekistan
- Vanuatu
- Venezuela
- Viet Nam
- Yemen
- Zambia
- Zimbabwe
- Other country

9. DO4 on environmental or carbon footprint

* 9.1 Contribution to design option on environmental or carbon footprint (DO4)

Do you want to contribute to section 11.1.4 of the working document on design option about environmental or carbon footprint? This section of the questionnaire contains 29 main questions.

- (●) Yes
- ( ) No, I want to skip this section of the questionnaire

Questions about DO4 on environmental or carbon footprint

* 9.2 Consequences of the information requirement on product footprint

Do you think an information requirement on product footprint would:

- ( ) Significantly decrease the footprint of the textile apparel, e.g. because consumers and manufacturers would choose and produce less impactful products, respectively.
- ( ) Somewhat decrease the footprint of the textile apparel.
- (●) Have no effect on the environmental impact of textile apparel.
- ( ) I have no opinion.

* 9.2.1 Why?

Text of 1 to 5000 characters will be accepted

There is no good way of measuring the environmental footprint at the moment, and the LCA-based tools that are under development, such as PEF, are deeply problematic. The problems are linked to these aspects, among other things: Unfair comparison between natural and synthetic fibers, not including biodegradability and plastic pollution, not dividing between positive and negative land-use (intensive and extensive or regenerative farming practices), disfavoring organic farming, use of non-representative and outdated data and use of global averages for parameters that are known to vary significantly. These problems will not be solved easily. There are also problems related to using aggregated data consumer-facing, because information towards consumers should be understandable, and linked to the specific problems of the product. We did not find the option ‘increase the footprint of the textile apparel’, but taking into consideration also possible unintended negative

effects of such labelling, this would also be a possible outcome. Both if a system as the current miserable PEF is used, with its support of plastification, but also as a result if consumers used the labelling to choose products they will not be satisfied with. For many consumers it is difficult to find apparel that fits their body and taste, and another parameter to consider, will make this even more difficult. The differences between the environmental footprint of different products has to be high in order to level out these negative effects. Because we currently don't have a system that measures the environmental footprint of textiles robustly (as the current PEF is based on too many assumptions, poor data quality, etc.) it is difficult to know if such differences exist. We also do not know if it is possible to create a labelling system that is fair and reliable and that captures this.
For SMEs and micro-sized businesses this needs to be navigable. For the fiber-formation LCS1 there are more progressive and manageable ways to measure 'sustainability'. Our suggestion would be for the LCS1, to ask are the fibers:

- Biodegradable?
- Do they contribute to growth historically and over time?
- Fossil-fuel based?
- Is traceability back to source available/possible (f ex Russian oil?)

* 9.3 Environmental footprint addressing LC2

DO4 was proposed as an environmental indicator to (1) help consumers make informed purchases of less impactful products, and (2) encourage manufacturers to produce products with lower environmental impacts. DO4 focuses only on Life-Cycle Stage 2 (LCS2 - manufacturing) and addresses 20% of the total lifecycle impacts when the environmental footprint is chosen as environmental indicator – see lines 5659- 5662.
Do you agree with the use of the proposed environmental indicator that addresses 20% of the total lifecycle impacts?

- ○ Yes, I agree
- ◉ Yes, I mostly agree
- ○ No, I mostly disagree
- ○ No, I disagree
- ○ I do not know / I have no opinion

* 9.3.1 Why?

Text of 1 to 5000 characters will be accepted

We agree that fibers have different properties and therefore cannot be directly compared, and at the same time there are also specific problems related to fossil products that have to be taken seriously, both because of the fibers themselves and to overproduction. We don't understand why JRC have such a low percentage for the manufacturing stage impact (20 %).

* 9.4 Carbon footprint addressing LC2

DO4 was proposed as an environmental indicator to (1) help consumers make informed purchases of less impactful products, and (2) encourage manufacturers to produce products with lower environmental impacts. DO4 focuses only on LCS2 (manufacturing) and addresses 6% of the total lifecycle impacts when the carbon footprint is chosen as environmental indicator. It addresses the most impactful category in that lifecycle stage (LCS2) – see lines 5659-5662.
Do you agree with the use of an environmental indicator that addresses the most impactful category of the manufacturing stage (LCS2), representing 6% of the total lifecycle impacts?

- [x] Yes, I agree
- [ ] Yes, I mostly agree
- [ ] No, I mostly disagree
- [ ] No, I disagree
- [ ] I do not know / I have no opinion

* 9.4.1 Why?

Text of 1 to 5000 characters will be accepted

The carbon footprint is easier to measure.

* 9.5 Choice of an environmental indicator

Many indicators (single or aggregated) can be chosen as environmental indicator of a product's footprint. The Life Cycle Assessment (LCA) reported in section 10.1 provides a useful and holistic analysis of most of the impacts generated due to the consumption of the three representative products in scope. In particular, the contribution analysis reported in section 10.1.2 details the contribution to the total lifecycle impacts of impact categories, Life-Cycle Stages (LCSs) and other contributing factors, such as energy and chemicals use.
In your opinion, what is the percentage of the total lifecycle impacts that the chosen environmental indicator should address?

- [ ] At least 5%
- [ ] At least 10%
- [ ] At least 20%
- [ ] At least 30%
- [ ] At least 40%
- [ ] At least 50%
- [ ] At least 60%
- [x] At least 70%
- [ ] At least 80%
- [ ] At least 90%
- [ ] It should address the whole lifecycle impacts
- [ ] I have no opinion

* 9.5.1 Why?

Text of 1 to 5000 characters will be accepted

If a consumer-facing label with a score on environmental impact is to be trust-worthy for the consumer, it must cover at least 70 % of the total environmental impact of the product. Otherwise, it will be greenwashing. Information to consumers has to be understandable, represent a significant difference and be documented. The current impact categories are lacking important categories such as biodegradability, microplastic as a potential End of Life environmental problem, etc. In the manufacturing stage there are also easier ways for SMEs and micro-sized businesses to assess their impact. How many dyeing and finishing processes has the product gone through? How far has it travelled?

*9.6 Dataset bias in LCS1

Lines 5668-5673 describe the reason of excluding Life-Cycle Stage 1 (LCS1) from DO4.

Do you agree that the datasets available for the environmental assessment of the several fibre types do not allow their fair comparison?

- ○ Yes, I agree
- ◉ Yes, I mostly agree
- ○ No, I mostly disagree
- ○ No, I disagree
- ○ I do not know / I have no opinion

*9.6.1 Why?

Text of 1 to 5000 characters will be accepted

Fibers have different properties, and as mentioned different system boundaries, making an LCA unsuitable for direct comparison. However, while the natural fibers have been stable or slightly declining, the man-made fibers, especially polyester, have been rapidly growing. To reduce environmental impact and overproduction or increase Duration of Service, this development has to be stopped.

*9.7 Inclusion of any other life-cycle stage (LCS)

Would you propose the inclusion of any other LCS?

- ○ No, only LCS2 (manufacturing)
- ○ Yes, the indicator should include LCS1 (raw materials) and LCS2 (manufacturing)
- ○ Yes, the indicator should include LCS1 (raw materials), LCS2 (manufacturing) and LCS3 (distribution)
- ○ Yes, the indicator should include LCS1 (raw materials), LCS2 (manufacturing), LCS3 (distribution) and LCS4 (use)
- ○ Yes, the indicator should include LCS1 (raw materials), LCS2 (manufacturing), LCS3 (distribution) and LCS4 (use) and LCS5 (end of life)
- ◉ Other
- ○ I do not know / I have no opinion

*9.7.1 If you chose Other, please specify which

Text of 1 to 5000 characters will be accepted

Depends on how the LCSs are evaluated, and for whom (large businesses or SMEs/micro-sized). See answer below.

*9.7.2 Why?

Text of 1 to 5000 characters will be accepted

Depending on what methods are used to measure the different LCSs, all could be included. But this would depend on f ex making LCS1 relevant, by not using LCA as the basis for evaluating fibers. Comparison of the impacts currently used in LCS1 as they are now, clearly do not make sense, as earlier described. It would be possible to measure and compare biodegradability, and to look at things that have an actual (and positive)

impact. Such as intensive vs extensive or regenerative land use, the albedo effect (which is quickly increasing in importance), biodiversity, etc. There is so much to discuss here that we feel the Bioeconomy strategy is starting to address, and that should be aligned with this regulation.

* 9.8 Methodology for the environmental indicator

What do you consider is the most suitable methodology to build the environmental indicator for the products in scope?

- ○ Environmental footprint based on the PEFCR
- ○ Carbon footprint based on the PEFCR
- ◉ Other
- ○ I have no opinion

* 9.8.1 Please, describe the environmental indicator you would suggest and elaborate on the reasons for your proposal.

Text of 1 to 5000 characters will be accepted

Currently there is, as far as we know, no other alternative out there. After following the development of PEFCR for many years, it is obvious that system will never become fair.

* 9.9 Environmental benchmark based on the PEFCR

At lines 5687-5706, the use of a benchmark based on PEFCR is described. An excellence label could be attributed to products where the manufacturer demonstrates that their environmental / carbon footprint associated to manufacturing is better than the benchmark set by the PEFCR for the representative product in that product category, indicating also the improvement (in %) with respect to the benchmark value. The JRC's proposal does not require economic operators to disclose the environmental / carbon footprint of the product. It is proposed as voluntary information to be disclosed by those willing to indicate excellence in their performance.

Do you agree with this proposal?

- ○ Yes, I agree
- ○ Yes, I mostly agree
- ○ No, I mostly disagree
- ◉ No, I disagree
- ○ I do not know / I have no opinion

* 9.9.1 Why?

Text of 1 to 5000 characters will be accepted

PEFCR for A&F are not reliable and the use of global averages based on the available data might give levels that are not trustworthy. Giving information about improvements in percentage based un such an unreliable benchmark might be greenwashing. As mentioned before, information to consumers should be trustworthy, reliable, easy to understand and verifiable. None of these will apply for PEF's baseline products.

* 9.10 Communicating the environmental indicator

At lines 5687-5706, the use of a label indicating improved performance with respect to a benchmark based on PEFCR is described. In this option the chosen environmental indicator would be expressed via an excellence label that additionally informs about the numerical value of the indicator, expressed in the relevant units:

- The carbon footprint would be expressed as CO2 equivalent,
- The environmental footprint would be expressed as environmental points.

If an environmental indicator would be used, do you agree with disclosing on a label only the numerical value of the environmental indicator expressed in the referred units?

- ○ Yes, I agree
- ○ Yes, I mostly agree
- ◉ No, I mostly disagree
- ○ No, I disagree
- ○ I do not know / I have no opinion

* 9.10.1 Why? What would be the advantages as well as the limitations and drawbacks?

Text of 1 to 5000 characters will be accepted

It's difficult to do this in an understandable and reliable way, and also that the information represents substantial differences.

* 9.11 Footprint information and increased costs

Section 6.2 reports that consumers prioritise purchases based on price, perceived quality and fit. Consumers express their concern on environmental impacts, but it is unknown how much more they are willing to pay for products less impactful on the environment.

Do you agree with introducing an information requirement on environmental or carbon footprint, despite an increase in costs to operators and users?

- ○ Yes, I agree
- ◉ Yes, I mostly agree
- ○ No, I mostly disagree
- ○ No, I disagree
- ○ I do not know / I have no opinion

* 9.11.1 Why?

Text of 1 to 5000 characters will be accepted

Given that reliable information exists, increased prices will in itself have a positive, unintended effect seen from an environmental point of view. The current situation for consumers is difficult to use as an argument. People might answer that perceived quality is important for them, but they have no clue what quality is or how it can be recognized in the market. Knowing the substantial use of disinformation and greenwashing, and the non-existent correlation between price and technical quality, looking for a low price makes sense. Building up a willingness to pay depends on development of trust in the systems. We also know that consumer surveys most often do not capture consumer praxis. The Section 6.2 does not take this problem seriously and could be improved by better contrasting praxis and discourse/what consumers say in surveys.

9.11.2 What increase in cost would you consider acceptable?

- ○ Up to 2%
- ○ Up to 4%
- ○ Up to 6%
- ○ Up to 8%
- ○ Up to 10%
- ○ Up to 20%
- ○ Up to 30%
- ○ Up to 40%
- ○ Up to 50%
- ○ Up to 60%
- ○ Up to 70%
- ○ Up to 80%
- ○ Up to 90%
- ○ Up to 100%
- ○ More than 100%
- ◉ I have no opinion

* 9.12 Assumptions about the effects of introducing a voluntary information requirement on environmental footprint for products performing above a certain benchmark (DO4.1)

Lines 5710- 5730 report the assumption made on the effect of using a voluntary information requirement on environmental footprint addressing the manufacturing stage (LCS2). We here refer to DO4.1.
Do you agree that the adoption of a voluntary information requirement disclosing the environmental footprint would result in a decrease of the environmental footprint of the representative products equal to 3%?

- ○ Yes, I agree
- ○ Yes, I mostly agree
- ◉ No, I mostly disagree
- ○ No, I disagree
- ○ I do not know / I have no opinion

* 9.12.1 Why?

Text of 1 to 5000 characters will be accepted

It is unclear for us if this is 3% of 20% or 3% of 100%. And it is also difficult to know whether the intended or unintended consequences will be the greatest. It depends on how the development of the systems and trust in the systems that doesn't yet exist.

* 9.12.2 Please specify the alternative value you propose along with its justification.

Text of 1 to 5000 characters will be accepted

This question is impossible to answer, due to the underlying uncertainties.

***9.12.2 What is the source of your proposal?**

- ○ Technical evidence that could be made available to JRC
- ◉ Expert judgement based on direct experience
- ○ Expert opinion that is neither based on technical evidence nor direct experience
- ○ Other

***9.13 Assumptions about the effects of introducing a voluntary information requirement on carbon footprint for products performing above a certain benchmark (DO4.2)**

Lines 5710- 5730 report the assumption made on the effect of using a voluntary information requirement on carbon footprint addressing the manufacturing stage (LCS2). We here refer to DO4.2.

Do you agree that the adoption of a voluntary information requirement disclosing the carbon footprint would allow a decrease of the carbon footprint of the representative products equal to 3%?

- ○ Yes, I agree
- ○ Yes, I mostly agree
- ◉ No, I mostly disagree
- ○ No, I disagree
- ○ I do not know / I have no opinion

***9.13.1 Why?**

Text of 1 to 5000 characters will be accepted

See the above answer.

***9.13.2 Please specify the alternative value you propose along with its justification.**

Text of 1 to 5000 characters will be accepted

This question is impossible to answer, due to the underlying uncertainties.

***9.13.3 What is the source of your proposal?**

- ○ Technical evidence that could be made available to JRC
- ◉ Expert judgement based on direct experience
- ○ Expert opinion that is neither based on technical evidence nor direct experience
- ○ Other

***9.14 Costs of labelling in DO4**

At lines 5731- 5734, it is reported that an additional cost of labelling is considered and estimated to be of 0.02 €/unit.

Do you agree that the additional cost of labelling is equal to 0.02 €/unit?

- ○ Yes, I agree
- ○ Yes, I mostly agree
- ○ No, I mostly disagree

- ○ No, I disagree
- ◉ I do not know / I have no opinion

* 9.15 Administrative costs of DO4

Lines 5735- 5780 describe the administrative costs for the implementation of DO4.

The authors highlight that estimation of the administrative costs should include the verification of two types of information:

(a) The input data (primary or secondary data) from specific industrial sites, which are representative of the supply chain of the specific product model described. The representativeness of input data should be documented and verified.

(b) The correct application of the PEFCR framework.

Do you agree that these are the only costs to be included?

- ○ Yes, I agree
- ○ Yes, I mostly agree
- ○ No, I mostly disagree
- ○ No, I disagree
- ◉ I do not know / I have no opinion

* 9.16 Administrative costs in DO4.1

Lines 5735- 5780 describe the administrative costs to implement DO4. Due to lack of more specific information, the current version of the preparatory study refers to estimates reported in the impact assessment carried out in support of Regulation (EU) 2023/1542 concerning carbon footprint thresholds for industrial and EV batteries.

Lines 5744- 5746 report the estimates for initial costs equal to EUR 2 550 per model and a verification cost equal to EUR 4 500 per model.

These estimates were used to account for the documentation and verification of the requirement on the environmental footprint (DO4.1), regardless of whether primary or secondary data are used.

Do you agree with these estimates?

Please in your answer, consider all the costs you think should be included for documenting and verifying DO4.1.

- ○ Yes, I agree
- ○ Yes, I mostly agree
- ○ No, I mostly disagree
- ○ No, I disagree
- ◉ I do not know / I have no opinion

* 9.17 Administrative costs in DO4.2

Lines 5735- 5780 describe the administrative costs for the implementation of DO4. Due to lack of more specific information, the current version of the preparatory study refers to estimates reported in the impact assessment carried out in support of Regulation (EU) 2023/1542 concerning carbon footprint thresholds for industrial and EV batteries.

Lines 5744- 5746 report the estimates for initial costs equal to EUR 2 550 per model and a verification cost equal to EUR 4 500 per model.
These estimates were used to account for the documentation and verification of the requirement on the carbon footprint (DO4.2), regardless of whether primary or secondary data were used.
Do you agree with these estimates?
Please in your answer, consider all the costs you think should be included for documenting and verifying DO4.2.

- ○ Yes, I agree
- ○ Yes, I mostly agree
- ○ No, I mostly disagree
- ○ No, I disagree
- ◉ I do not know / I have no opinion

* 9.18 Administrative costs per unit of knitted products in DO4.1

Lines 5735- 5780 describe the administrative costs for the implementation of DO4. Due to lack of more specific information, the current version of the preparatory study refers to estimates reported in the impact assessment carried out in support of Regulation (EU) 2023/1542 concerning carbon footprint thresholds for industrial and EV batteries.
Lines 5749- 5757 report that the estimated cost per unit of knitted product is equal to EUR 0.07.
Do you agree that this cost estimate covers all upstream costs incurred to comply with the disclosure required by DO4.1?

- ○ Yes, I agree
- ○ Yes, I mostly agree
- ○ No, I mostly disagree
- ○ No, I disagree
- ◉ I do not know / I have no opinion

* 9.19 Administrative costs per unit of knitted products in DO4.2

Lines 5735- 5780 describe the administrative costs for the implementation of DO4. Due to lack of more specific information, the current version of the preparatory study refers to estimates reported in the impact assessment carried out in support of Regulation (EU) 2023/1542 concerning carbon footprint thresholds for industrial and EV batteries.
Lines 5749- 5757 report that the estimated cost per unit of knitted product is equal to EUR 0.07.
Do you agree that this cost estimate covers all upstream costs incurred to comply with the disclosure required by DO4.2?

- ○ Yes, I agree
- ○ Yes, I mostly agree
- ○ No, I mostly disagree
- ○ No, I disagree
- ◉ I do not know / I have no opinion

* 9.20 Administrative costs per unit of denim products in DO4.1

Lines 5735- 5780 describe the administrative costs for the implementation of DO4. Due to lack of more specific information, the current version of the preparatory study refers to estimates reported in the impact assessment carried out in support of Regulation (EU) 2023/1542 concerning carbon footprint thresholds for industrial and EV batteries.
Lines 5749- 5757 report that the estimated cost per unit of denim product is equal to EUR 0.14.
Do you agree that this cost estimate covers all upstream costs incurred to comply with the disclosure required by DO4.1?

- Yes, I agree
- Yes, I mostly agree
- No, I mostly disagree
- No, I disagree
- I do not know / I have no opinion

* 9.21 Administrative costs per unit of denim products in DO4.2

Lines 5735- 5780 describe the administrative costs for the implementation of DO4. Due to lack of more specific information, the current version of the preparatory study refers to estimates reported in the impact assessment carried out in support of Regulation (EU) 2023/1542 concerning carbon footprint thresholds for industrial and EV batteries.
Lines 5749- 5757 report that the estimated cost per unit of denim product is equal to EUR 0.14.
Do you agree that this cost estimate covers all upstream costs incurred to comply with the disclosure required by DO4.2?

- Yes, I agree
- Yes, I mostly agree
- No, I mostly disagree
- No, I disagree
- I do not know / I have no opinion

* 9.22 Administrative costs per unit of other woven products in DO4.1

Lines 5735- 5780 describe the administrative costs for the implementation of DO4. Due to lack of more specific information, the current version of the preparatory study refers to estimates reported in the impact assessment carried out in support of Regulation (EU) 2023/1542 concerning carbon footprint thresholds for industrial and EV batteries.
Lines 5749- 5757 report that the estimated cost per unit of other woven product is equal to EUR 0.09.
Do you agree that this cost estimate covers all upstream costs incurred to comply with the disclosure required by DO4.1?

- Yes, I agree
- Yes, I mostly agree
- No, I mostly disagree
- No, I disagree
- I do not know / I have no opinion

* 9.23 Administrative costs per unit of other woven products in DO4.2

Lines 5735- 5780 describe the administrative costs for the implementation of DO4. Due to lack of more specific information, the current version of the preparatory study refers to estimates reported in the impact assessment carried out in support of Regulation (EU) 2023/1542 concerning carbon footprint thresholds for industrial and EV batteries.
Lines 5749- 5757 report that the estimated cost per unit of other woven product is equal to EUR 0.09.
Do you agree that this cost estimate covers all upstream costs incurred to comply with the disclosure required by DO4.2?

- Yes, I agree
- Yes, I mostly agree
- No, I mostly disagree
- No, I disagree
- (•) I do not know / I have no opinion

* 9.24 Uptake of the voluntary disclosure of information in DO4

Lines 5758- 5763 report the estimated level of uptake by the market of the voluntary reporting of the product footprint proposed in DO4.
Do you agree that 50% of the product models placed on the EU market would disclose this voluntary information?

- Yes, I agree
- Yes, I mostly agree
- No, I mostly disagree
- No, I disagree
- (•) I do not know / I have no opinion

* 9.25 Additional costs related to DO4

Would you propose any additional costs to be considered related to design option 4 (DO4) on product footprint?

- Yes, I want to propose additional costs
- No, I cannot propose additional costs
- (•) I have no opinion

* 9.26 Voluntary information requirement for DO4

Lines 5699-5701 propose that the disclosure of information regarding the environmental indicator – environmental or carbon footprint – should be voluntary. This means that the manufacturers would not need to calculate their footprints if they did not want to be attributed the excellence label that would indicate that they perform better than the average. Do you agree that this calculation should be voluntary?

- Yes, I agree
- Yes, I mostly agree
- No, I mostly disagree
- (•) No, I disagree
- I do not know / I have no opinion

* 9.26.1 Why?

Text of 1 to 5000 characters will be accepted

Voluntary or mandatory both depend on a system of trustworthy data, as long as such a system does not exist today, it isn't feasible.

* 9.27 Use of primary and secondary data for the information requirement in DO4

Lines 5702 -5703 indicate that the proposed environmental indicator – environmental or carbon footprint – can be calculated based on primary or secondary data and that a label would be used to inform about the type of data used. This means that the manufacturer would need to adjust their inventory and then use the default average (secondary) or real (primary) data to quantify the impacts.

Would you support the use of:

- (●) Only primary data
- ( ) Only secondary data
- ( ) Both primary and secondary data following the directions reported in the PEFCR framework
- ( ) Other
- ( ) I do not know / I have no opinion

* 9.27.1 Why?

Text of 1 to 5000 characters will be accepted

Labelling on products should be about the product itself, not proxy numbers. It also has to be understandable for the consumers. A blend of primary and secondary data might be difficult to understand, and also as JRC describes so eloquently in lines 5716 to 5719, secondary data might be tempting to misuse. However, that said, for SMEs and micro-sized businesses, and smallholders as well, if LCS1 is included, there needs to be realism. We have addressed this earlier, and here one needs simply a more navigable approach to data.

* 9.28 Classes of performance on DO4

Lines 5699-5701 propose the voluntary information disclosure of the environmental indicator – environmental or carbon footprint.

Classes of performance are a structured categorisation that translates a product's performance on a single key parameter (e.g. carbon footprint), or an aggregated single score (e.g. environmental footprint), into clear bands that are easy to compare. For example, considering 5 classes from A to E, with A being the best and E the worst.

Under the ESPR, they are used to benchmark and differentiate products, incentivise better-performing designs and communicate circularity and environmental performance on labels to guide customers' choices, while ensuring that the lowest class aligns with the minimum required performance.

Would you be in favour of proposing classes of performance on an environmental indicator disclosed in DO4?

- ( ) Yes, I would
- ( ) Yes, I mostly would
- ( ) No, I mostly would not
- (●) No, I would not
- ( ) I do not know / I have no opinion

* 9.28.1 Why?

Text of 1 to 5000 characters will be accepted

The indicators are few and a lot of other aspects will be important for the consumers, to make a grading system based on a few selected and not necessarily important design features would not be understandable nor represent substantial information. It is better to inform the consumers about performance levels relevant for the product. F ex pilling on upper-body garments.

* 9.29 Mandatory information requirement for DO4

Lines 5699-5701 propose the voluntary information disclosure of the environmental indicator – environmental of carbon footprint.

Would you be in favour of setting a mandatory information requirement for DO4?

- ○ Yes, I would
- ◉ Yes, I mostly would
- ○ No, I mostly would not
- ○ No, I would not
- ○ I do not know / I have no opinion

* 9.29.1 Why?

Text of 1 to 5000 characters will be accepted

Yes, this could be a good idea, but we have the same concerns as with the voluntary.

* 9.30 Mandatory performance requirement for DO4

Lines 5699-5701 propose the voluntary information disclosure of the environmental indicator – environmental of carbon footprint.

Alternatively, in case an information requirement would be set, would you be in favour of also setting a performance requirement for DO4?

- ○ Yes, I would
- ○ Yes, I mostly would
- ◉ No, I mostly would not
- ○ No, I would not
- ○ I do not know / I have no opinion

* 9.30.1 Why?

Text of 1 to 5000 characters will be accepted

To do this, the requirements must be stricter than the current regulation, which is two to five years normal use, f ex, in Norway. Therefore, firstly we need research that defines normal use for two/five years, and find requirements that are feasible and stricter, and also consider improving consumer rights is a better option than setting minimum requirements. Requirements should be different for natural fibers and synthetics, not to favor the latter.

10. Combination of design options: paths

* 10.1 Contribution to the combination of design options: paths

Do you want to contribute to section 11.2 of the working document on combinations of design options? This section of the questionnaire contains 14 main questions.

- (●) Yes
- ( ) No, I want to skip this section of the questionnaire

Questions about Combination of design options: paths

* 10.2 Investigation of three combinations of design options: paths

Lines 5824- 5848 report the reasoning for the combination of the design options.

Do you agree with the proposed paths?

- ( ) Yes, I agree
- ( ) Yes, I mostly agree
- ( ) No, I mostly disagree
- ( ) No, I disagree
- (●) I do not know / I have no opinion

* 10.3 Additional combination of design options: paths

Lines 5824- 5848 report the reasoning for the combination of the design options presented.

Would you be in favour of assessing additional grouping of design options?

- ( ) Yes, I would
- ( ) Yes, I mostly would
- ( ) No, I mostly would not
- ( ) No, I would not
- (●) I do not know / I have no opinion

* 10.4 Assumptions for the Full Synergy Scenario

Section 11.2.1 reports the estimates for the assessment of the paths.

In the Full Synergy Scenario, it is assumed that 50% of the time the information provided acts synergistically in terms of the effect it has on consumers and consequently also on manufacturers, achieving the full improvement effect of 5% for each product aspect.

Do you agree with the values chosen for the Full Synergy Scenario?

- ( ) Yes, I agree
- ( ) Yes, I mostly agree
- ( ) No, I mostly disagree
- ( ) No, I disagree
- (●) I do not know / I have no opinion

* 10.5 Assumptions for the Partial Adjacency Scenario

Section 11.2.1 reports the estimates for the assessment of the paths.

In the Partial Adjacency Scenario, it is assumed that 35% of the time the information is not completely synergistic, assuming that the consumer will choose some product aspects to prioritise. This would lead to a reduced improvement as compared to the full 5% improvement estimate for each product aspect.

Do you agree with the values chosen for the Partial Adjacency Scenario?

- Yes, I agree
- Yes, I mostly agree
- No, I mostly disagree
- No, I disagree
- I do not know / I have no opinion

* 10.6 Assumptions for the Independent Choice Scenario

Section 11.2.1 reports the estimates for the assessment of the paths.

In the Independent Choice Scenario, it is assumed that 15% of the time, the consumer is predominantly influenced by one indicator that conflicts with the rest, achieving a 5% improvement only in one of the product aspects.

Do you agree with the values chosen for the Independent Choice Scenario?

- Yes, I agree
- Yes, I mostly agree
- No, I mostly disagree
- No, I disagree
- I do not know / I have no opinion

* 10.7 Improvement value corresponding to the synergy of two DOs

Lines 5875- 5882 report the estimates for the effect of two design options analysed together.

Do you agree with the improvement value adopted when two design options are analysed together?

- Yes, I agree
- Yes, I mostly agree
- No, I mostly disagree
- No, I disagree
- I do not know / I have no opinion

* 10.8 Improvement value corresponding to the synergy of three DOs

Lines 5883-5889 report the estimates for the effect of three design options analysed together.

Do you agree with the improvement value adopted when three design options are analysed together?

- Yes, I agree
- Yes, I mostly agree
- No, I mostly disagree
- No, I disagree
- I do not know / I have no opinion

* 10.9 Improvement value corresponding to the synergy of four DOs

Lines 5890-5893 report the estimates for the effect of four design options analysed together.

Do you agree with the improvement value adopted when four design options are analysed together?

- ○ Yes, I agree
- ○ Yes, I mostly agree
- ○ No, I mostly disagree
- ○ No, I disagree
- ◉ I do not know / I have no opinion

* 10.10 Improvement value adopted for environmental and carbon footprint in paths

Lines 5894-5897 report the estimates for the effect of voluntary information requirements on environmental or carbon footprint when they are analysed together with other DOs. Their effect was estimated to improve by 2.5% the footprint of the representative products.

Do you agree with this estimate?

- ○ Yes, I agree
- ○ Yes, I mostly agree
- ○ No, I mostly disagree
- ○ No, I disagree
- ◉ I do not know / I have no opinion

* 10.11 Increased price of textile apparel due to ecodesign requirements

The implementation of the ecodesign requirements could increase the price of the textile apparel placed on the EU market.

What is the purchase price increase that you would consider acceptable – not disproportionate?

- ○ None
- ○ Up to 1%
- ○ Up to 5%
- ○ Up to 10%
- ○ Up to 20%
- ○ Up to 30%
- ○ Up to 40%
- ○ Up to 50%
- ○ Up to 60%
- ○ Up to 70%
- ○ Up to 80%
- ○ Up to 90%
- ○ Up to 100%
- ○ More than 100%
- ◉ I do not know / I have no opinion

* 10.12 Increase of costs of textile apparel due to ecodesign requirements

By normalising the costs over the whole lifecycle to a yearly basis, the figures could reflect how the price increase is diluted and offset over longer lifetimes. Thus, in terms of annualised costs over the whole lifecycle, what is the increase that you would consider acceptable – not disproportionate?

- ○ None
- ○ Up to 1%
- ○ Up to 5%
- ○ Up to 10%
- ○ Up to 20%
- ○ Up to 30%
- ○ Up to 40%
- ○ Up to 50%
- ○ Up to 60%
- ○ Up to 70%
- ○ Up to 80%
- ○ Up to 90%
- ○ Up to 100%
- ○ More than 100%
- ◉ I do not know / I have no opinion

* 10.12.1 Assessment of increase in cost

In which terms would you analyse whether an increase in cost is proportionate?

- ○ Purchase price
- ○ Annualised costs over the whole lifetime
- ○ Societal costs
- ◉ I do not know / I have no opinion

* 10.13 Preferred design option combination: path

Which is your preferred analysed path?

- ○ Path 1, which includes the information requirements on robustness, recyclability, recycled content and environmental footprint, as well as a performance requirement on recycled content.
- ○ Path 2, which includes the information requirements on robustness, recyclability, recycled content and carbon footprint, as well as a performance requirement on recycled content.
- ○ Path 3, which includes the information requirements on recyclability and recycled content, as well as a performance requirement on recycled content.
- ◉ None of the above
- ○ I have no opinion

* 10.13.1 Why?

Text of 1 to 5000 characters will be accepted

The paths suggested either lack scientific justification of efficiency to reduce the environmental footprint, or they lack methods to calculate the differences between products. We also think it's a weakness that not more parameters are included that are of importance, such as fit.

* 10.14 Products in the scope and the proposed DOs

The scope of the preparatory study is described in section 3.2.

Do you think that there are products in scope of the preparatory study that could have problems complying with the proposed DOs?

- ○ Yes, there are
- ○ No, there are not
- ◉ I have no opinion

* 10.15 Inclusion of further DOs

Would you propose further design options?

- ◉ Yes, I would
- ○ No, I would not
- ○ I have no opinion

* 10.15.1 Which ones? Please motivate your response.

Text of 1 to 5000 characters will be accepted

We have already listed several options for Design Options with potential to reduce environmental impact. By affecting the growth of polyester or products with inherent problems: Products where polyester can be replaced by natural fibers, elastane in jeans, pre-stressed denim, apparel with electronics, items in polyester easily lost in nature, single-use wipes and other single-use textiles, non-cleanable apparel, etc. It may be a good idea to collect suggestions from NGOs and consumer organizations. Suggestions might also include less dyeing and finishing, where they have little practical or esthetical impact. If we are going to reduce something, opening up the discussion on what we can reduce is a good idea.

* 10.15.2 Information supporting additional design options

Which information presented in the sections 1-10 of the working document support the proposal of such additional design option? Alternatively, what other evidence and information would support your proposal?

Text of 1 to 5000 characters will be accepted

The research these suggestions build on, is available at this website:
https://clothingresearch.oslomet.no/

11. Chemical substances in textile products

* 11.1 Contribution to substances of concern

Do you want to contribute to section 12 of the working document on chemical substances in textile products?

This section of the questionnaire contains 14 main questions.

- ◉ Yes

- ( ) No, I want to skip this section of the questionnaire

Questions about chemical substances in textile products

* 11.2 Information requirements – SoCs type (d) (1 of 2)

Considering:

The legislative and technical context of the preparatory study, The knowledge and evidence presented in the working document of the 3rd milestone, The definition of Substances of Concern (SoCs) under the ESPR - Article 2(27),

Do you agree that substances which are known to have a negative effect on reuse and recycling due to existing regulatory limitations associated to their chemical safety (e.g. under REACH or POPs Regulation), should be identified as SoCs type (d)? (Refer to lines 6815 – 6822).

- (•) Yes, I agree
- ( ) Yes, I mostly agree
- ( ) No, I mostly disagree
- ( ) No, I disagree
- ( ) I do not know / I have no opinion

* 11.2.1 Why?

Text of 1 to 5000 characters will be accepted

The chemical of concern content both for reuse and recycling, and even more for use, should certainly be clearly labelled on products. As it is today, fiber content is misunderstood as the list of content. Because both knowledge on chemical and legislation on content are changing, we also need dating of the products for security reasons. In addition to the content of Substances of Concern (SoC) being labeled, there should be information on why they have been included, to improve the understanding of the choices made. Why have certain SoC used in the product been used? Where they necessary? What did they add for the consumer?

* 11.3 Information requirements – SoCs type (d) (2 of 2)

Considering:

The legislative and technical context of the preparatory study, The knowledge and evidence presented in the working document of the 3rd milestone, The definition of Substances of Concern (SoCs) under the ESPR - Article 2(27),

Are you aware of any substances “negatively affecting the reuse or recycling of materials in the product in which it is present”, other than those referred to in the previous question?

- (•) Yes, I am aware
- ( ) No, I am not aware

* 11.3.1 Please provide the substance identifiers (name, CAS, etc.) and explain why such substances would affect the recycling or reuse of materials in the product in which it is present (and therefore should be identified as SoC (d)).

Text of 1 to 5000 characters will be accepted

We are not going into detail, but would rather point to the growing evidence that synthetic fibers as well as synthetic dyes have negative health effects and therefore may regarded as Substances of Concern.

* 11.4 Information requirements – Thresholds for SoCs (a) and (c)

Consider the proposed thresholds triggering the tracking of SoCs (lines 6823 - 6939).

Do you agree with the JRC proposal to track SoCs (a) and (c) present in textile apparel starting from a general threshold concentration set at 0.1% w/w?

- Yes, I agree
- Yes, I mostly agree
- No, I mostly disagree
- No, I disagree
- I do not know / I have no opinion

* 11.5 Information requirements – Thresholds for SoCs (b)

Consider the proposed thresholds triggering the tracking of SoCs (lines 6823 - 6939).

Do you agree to track SoCs (b) when they exceed the cut-off values as shown in Table 1.5.1 provided under section 1.5.3. on 'General guidance for compiling safety data sheets' of the Globally Harmonised System on Classification and Labelling of Chemicals (GHS)?

- Yes, I agree
- Yes, I mostly agree
- No, I mostly disagree
- No, I disagree
- I do not know / I have no opinion

* 11.6 Information requirements – Thresholds for SoCs (b) in hazard classes not recognised under GHS

Consider the proposed thresholds triggering the tracking of SoCs (lines 6823 - 6939).

For SoCs (b) to which a relevant hazard class or category not listed in the referred GHS table can be attributed, do you agree to use, as a concentration threshold to trigger tracking obligations, the generic concentration limit (GCL) for that hazard class / category defined in Annex I to CLP? (lines 6883 – 6905).

- Yes, I agree
- Yes, I mostly agree
- No, I mostly disagree
- No, I disagree
- I do not know / I have no opinion

* 11.7 Information requirements – Thresholds for SoCs (d) identified due to technical constraints

Consider the proposed thresholds triggering the tracking of SoCs (lines 6823 - 6939).

The 3rd milestone of the working document of the preparatory study does not propose information requirements on SoCs (d) identified due to technical constraints (i.e. for reasons primarily other than chemical safety), given no such substances have been identified.

Do you agree with this proposal?

- Yes, I agree
- Yes, I mostly agree
- No, I mostly disagree
- No, I disagree
- I do not know / I have no opinion

* 11.8 Information requirements – Thresholds for SoCs (d) subject to regulatory limitations (e.g. under REACH)

Consider the proposed thresholds triggering the tracking of SoCs (lines 6823 - 6939).

Lines 6923 - 6931 report that for SoCs (d) identified as such due to regulatory limitations, the threshold for tracking these substances could be (1) equal, or (2) lower than the legal applicable regulatory limit, or (3) a generic limit (eg 0.1%). The proposal in the 3rd milestone is (1) equal to the regulatory limit value.

Do you agree to the threshold proposed for SoCs (d) due to regulatory limitations?

- Yes, I agree
- Yes, I mostly agree
- No, I mostly disagree
- No, I disagree
- I do not know / I have no opinion

* 11.9 Information requirements – Thresholds for SoCs (d) limited by customers

Consider the proposed thresholds triggering the tracking of SoCs (lines 6823 - 6939).

Lines 6932 - 6935 report that for SoCs (d) identified due to customer-driven limitations (other than those covered by regulatory limitations already applicable in the EU), tracking should be defined case-by-case and if possible, in agreement with stakeholders. Currently, the thresholds to track these SoCs (d) are proposed to align with those, as applicable, in AFIRM, Bluesign or ZDHC substance lists.

Do you agree to this?

- Yes, I agree
- Yes, I mostly agree
- No, I mostly disagree
- No, I disagree
- I do not know / I have no opinion

* 11.10 Basis for the calculation of substance concentrations against which to assess thresholds

With reference to lines 6847 – 6871, out of the two options proposed as the basis for calculating the substance concentrations against which to compare the thresholds to trigger information requirements on SoC, which is your preferred option?

- Option 1. - Calculation (w/w) made based on the weight of the final garment (lines 6850 – 6854).

- ○ Option 2. - Calculation based on two separate groups of materials (i) the textile fibres component of the apparel textile product (aggregated weight of textile materials) and including soft non-fibre components such as leather, and (ii) separate calculation for individual hard components, in particular buttons, sequins, zippers, etc. which would be assessed based on their individual respective weights (lines 6855 – 6863).
- ◉ Another calculation approach.
- ○ I have no opinion

* 11.10.1 Please motivate your reply?

Text of 1 to 5000 characters will be accepted

Weighting is not easy. Weighing products without trims and soft parts, etc. certainly is not. Seen from a consumer perspective, the content of chemicals in apparel trousers might be more comparable to another pair of trousers, regardless the weight of the trousers. All evaluation based on weight might be in favor of synthetics, because they are generally lighter than natural fibers. This should be taken into consideration when evaluating the weighting system. It might be that per item is better than based on weight. All design options and interventions should be carefully considered not to strengthen the growth through favoring synthetics.

* 11.11 Exemptions

Lines 7001 – 7005 propose that only chemical substances remaining in the final product and intentionally added are subject to mandatory tracking, i.e. to information requirements. This entails exempting from information requirements e.g. those chemical substances that are not intentionally added to the final products and that are not present in the final product but that are otherwise related to the life cycle of the products (e.g. process chemicals). Do you agree with the proposed approach?

- ○ Yes, I agree
- ○ Yes, I mostly agree
- ○ No, I mostly disagree
- ○ No, I disagree
- ◉ I do not know / I have no opinion

* 11.12 Entry into application for information requirements for SoCs (a), (c) and (d)

Lines 7064 – 7066 propose that SoCs (a), (c) and (d) in the product are subject to information requirements 18 months after the future Delegated Act on textile apparel is published in the Official Journal of the European Union (OJEU), as per the ordinary statutory minimum transition period set out in Article 4(4) ESPR.
Do you agree?

- ○ Yes, I agree
- ○ Yes, I mostly agree
- ○ No, I mostly disagree
- ○ No, I disagree
- ◉ I do not know / I have no opinion

* 11.13 Entry into application for SoCs (b)

Lines 7067 – 7095 propose a tiered entry into application of the tracking of SoCs (b). Do you agree?

- ○ Yes, I agree
- ○

Yes, I mostly agree

- ○ No, I mostly disagree
- ○ No, I disagree
- ◉ I do not know / I have no opinion

* 11.14 delayed entry into application for SoCs (b) due to hazards not covered under GHS

Lines 7081 – 7095 propose a long (8 year) delay in the entry into application for the information requirement on substances identified as SoC(b) exclusively due to being classified under hazard classes recognised under the CLP Regulation but not currently under GHS.

Do you agree with this proposal?

- ○ Yes, I agree
- ○ Yes, I mostly agree
- ○ No, I mostly disagree
- ○ No, I disagree
- ◉ I do not know / I have no opinion

* 11.15 Performance requirements

In lines 7351 – 7354 of the working document, the JRC concluded that there is not sufficient scientific evidence to enable proposing the setting of performance requirements for specific chemical substances identified in the inventory associated to apparel textile products.

Do you agree with this?

- ○ Yes, I agree
- ○ Yes, I mostly agree
- ○ No, I mostly disagree
- ◉ No, I disagree
- ○ I do not know / I have no opinion

* 11.15.2 Why?

Please indicate for which substances it would be appropriate to propose a specific performance requirement and provide the rationale for such proposal – other than primarily for chemical safety reasons. Note that substances for which chemical safety concerns would be the primary reason for potentially proposing a performance requirement, these should in principle not be addressed under ESPR, but rather under dedicated legislation (e.g. REACH, POPs Regulation, RoHS, etc).

Text of 1 to 5000 characters will be accepted

We fully understand the complexity and the problems connected to the vast number of chemical and their possible impact. The immature state of the recycling and reuse sector is adding on to this complexity. It is uncertain which Substances of Concern that will in the future negatively impact this industry. At the same time, it is necessary to take a precautionary perspective. We know that less is better. It could be meaningful to not mandate labelling all chemical substances, but rather for what purposes they are added. F ex: bleaching, dyeing, anti-bacterial, odor-control, flame retardants, water-proofing, stain-resistance, etc. This will at least say something about the design choices, and give the consumer the opportunity to choose products with less. Such labelling might also raise the awareness of the complexity of additives and their performance in the textile sector.

12. Environmental and economic model

* 12.1 Contribution to environmental and economic model

Do you want to contribute to section 13.11 of the working document on environmental and economic model? This section of the questionnaire contains 12 main questions.

- (●) Yes
- ( ) No, I want to skip this section of the questionnaire

Questions about the environmental and economic model

* 12.2 Fibre composition of knitted products (RP1)

The Life Cycle Inventory (Textile-Prep-Study_3rd-Milestone_Model_20251215.xlsx) in tab “Base Case – Input data” at rows 10-31 report (column G) the fibre composition for knitted products. Information on the percentages of the more granular product groups (e.g. T-Shirt) considered for this representative product can be found in the tab “Consumer choice sc – supporting” at rows 1-5.

Do you agree with the proposed values?

- ( ) Yes, I agree
- ( ) Yes, I mostly agree
- ( ) No, I mostly disagree
- ( ) No, I disagree
- (●) I do not know / I have no opinion

* 12.3 Fibre composition of other woven products (RP2)

The Life Cycle Inventory (Textile-Prep-Study_3rd-Milestone_Model_20251215.xlsx) in tab “Base Case – Input data” at rows 10-31 report (column H) the fibre composition for other woven products. Information on the percentages of the more granular product groups (e.g. Shirts and blouses) considered for this representative product can be found in the tab “Consumer choice sc – supporting” at rows 1-5.

Do you agree with the proposed values?

- ( ) Yes, I agree
- ( ) Yes, I mostly agree
- ( ) No, I mostly disagree
- ( ) No, I disagree
- (●) I do not know / I have no opinion

* 12.4 Fibre composition of denim products (RP3)

The Life Cycle Inventory (Textile-Prep-Study_3rd-Milestone_Model_20251215.xlsx) in tab “Base Case – Input data” at rows 10-31 (column I) report the fibre composition for denim products. Information on the percentages of the more granular product groups (e.g. Denim jackets) considered for this representative product can be found in the tab “Consumer choice sc – supporting” at rows 1-5.

Do you agree with the proposed values?

- Yes, I agree
- Yes, I mostly agree
- No, I mostly disagree
- No, I disagree
- (•) I do not know / I have no opinion

* 12.5 Losses in manufacturing

The Life Cycle Inventory (Textile-Prep-Study_3rd-Milestone_Model_20251215.xlsx) in tab “Base Case – Input data” at rows 32-36, 39-44, 48, 54-56 reports the losses and further information can be found in lines 12451-12471 of the working document.

Do you agree with the proposed values?

- Yes, I agree
- Yes, I mostly agree
- No, I mostly disagree
- No, I disagree
- (•) I do not know / I have no opinion

* 12.6 Geographic location of production of textile fibres

The Life Cycle Inventory (Textile-Prep-Study_3rd-Milestone_Model_20251215.xlsx) in tab “Base Case – Input data” at rows 61-93 reports the geographic location of production of textile fibres and further information can be found in lines 12366-12387 of the working document.

Do you agree with the proposed values?

- Yes, I agree
- Yes, I mostly agree
- (•) No, I mostly disagree
- No, I disagree
- I do not know / I have no opinion

* 12.6.2 Why?

Please provide an alternative value expressed as percentage and make sure that the suggested shares add up to 100% for each type of fibre. Add references to your proposal.

Text of 1 to 5000 characters will be accepted

> We don’t have input on the percentage, but we have a comment to the BC, BAT and BNAT related production and origin. It might be of interest for the consumer to know whether the polyester made in China is made of Russian, Saudi Arabian or Iranian oil. This supports a more precise labeling of origin, where the raw material extraction (in this example fossil fuel) and the fiber production take place. We recognize the traceability problems in the industry, to set precise targets might improve this over time, rather than the more abstract grouping into BC, BAT and BNAT. The same reasoning could also be applied to the later stages in production. A comprehensive list of production stages with locations will also give information on how far the product has travelled.

* 12.7 Geographic location of manufacturing processes

The Life Cycle Inventory (Textile-Prep-Study_3rd-Milestone_Model_20251215.xlsx) in tab “Base Case – Input data” at rows 94-153 reports the geographic location of manufacturing processes and further information can be found in lines 12528-12535 of the working document.
Do you agree with the proposed values?

- ○ Yes, I agree
- ○ Yes, I mostly agree
- ○ No, I mostly disagree
- ○ No, I disagree
- ◉ I do not know / I have no opinion

* 12.8 Economic values

The Life Cycle Inventory (Textile-Prep-Study_3rd-Milestone_Model_20251215.xlsx) in tab “Base Case – Input data” at rows 154-160 reports the values for the ‘Full time equivalent’, ‘Interest rate’, ‘Working hours per year’, ‘Discount rate’, ‘VAT’, ‘Tariff for textile intermediate product’, and ‘Tariff for textile final product’ and further information can be found in lines 12472-12514 and 13074-13077 of the working document.
Do you agree with the proposed values?

- ○ Yes, I agree
- ○ Yes, I mostly agree
- ○ No, I mostly disagree
- ○ No, I disagree
- ◉ I do not know / I have no opinion

* 12.9 Parameters related to the use stage

The Life Cycle Inventory (Textile-Prep-Study_3rd-Milestone_Model_20251215.xlsx) in tab “Base Case – Input data” at rows 8 and 232-242 reports the values for the parameters related to the use stage and further information can be found in lines 12182-12243 and 12746-12793 of the working document.
Do you agree with the proposed values?

- ○ Yes, I agree
- ◉ Yes, I mostly agree
- ○ No, I mostly disagree
- ○ No, I disagree
- ○ I do not know / I have no opinion

* 12.9.1 Why?

Text of 1 to 5000 characters will be accepted

We don’t have any opinion on the choices made but have a comment on the current knowledge situation for Duration of Service. In many different counting exercises, LCA, LCC, etc., the Duration of Service will have a huge impact (Wiedemann, S.G. et al. Reducing environmental impacts from garments through best practice garment use and care, using the example of a Merino wool sweater). However, we lack knowledge about the current average Duration of Service, but even more about the best-case scenarios within different product groups and Design Options. Current best-practice is important to understand how much could be improved by less production, and also what is in need to improve in design. Optimizing current use of products is preferable because it doesn’t have the side-effect of making them more durable or robust has.

* 12.10 Shares of the End-of-Life routes

The Life Cycle Inventory (Textile-Prep-Study_3rd-Milestone_Model_20251215.xlsx) in tab “Base Case – Input data” at rows 243-250 reports the values for the parameters related to the end-of-life and further information can be found in lines 12901-12928 of the working document.

Do you agree with the proposed values?

- ○ Yes, I agree
- ○ Yes, I mostly agree
- ○ No, I mostly disagree
- ○ No, I disagree
- ◉ I do not know / I have no opinion

* 12.11 Fibre prices

The Life Cycle Inventory (Textile-Prep-Study_3rd-Milestone_Model_20251215.xlsx) in tab “Base Case – Input data” at rows 275-308 reports the values for the prices of fibres purchased from the various countries and further information can be found in lines 12336-12362 of the working document (acronyms: RoW = rest of the world; AU = Australia; CN = China; EU = Europe; ID = Indonesia; IN = India; HU = Hungary; NZ = New Zealand; Others = other countries; PO = Poland; RSA = South Africa; TR= Türkiye; TW = Taiwan; US = United State).

Do you agree with the proposed values?

- ○ Yes, I agree
- ○ Yes, I mostly agree
- ○ No, I mostly disagree
- ○ No, I disagree
- ◉ I do not know / I have no opinion

* 12.12 Energy prices

The Life Cycle Inventory (Textile-Prep-Study_3rd-Milestone_Model_20251215.xlsx) in tab “Base Case – Input data” at rows 309-341 reports the values for the prices of energy purchased in various countries and further information can be found in lines 12932-12959 of the working document (acronyms: RoW = rest of the world; BD = Bangladesh; CN = China; EU = Europe; ID = Indonesia; IN = India; GLO = Global; NZ = New Zealand; Others = other countries; PK = Pakistan ; PO = Poland; TR= Türkiye; TW = Taiwan; US = United State; VN = Vietnam).

Do you agree with the proposed values?

- ○ Yes, I agree
- ○ Yes, I mostly agree
- ○ No, I mostly disagree
- ○ No, I disagree
- ◉ I do not know / I have no opinion

* 12.13 Cost for HR

The Life Cycle Inventory (Textile-Prep-Study_3rd-Milestone_Model_20251215.xlsx) in tab “Base Case – Input data” at rows 342-350 reports the values for the cost of HR in various countries (acronyms: RoW = rest of the world; BD = Bangladesh; CN = China; EU = Europe; IN = India; GLO = Global; Others = other countries; PK = Pakistan ; TR= Türkiye; US = United State; VN = Vietnam). Further information can be found in lines 12494-12507 of the working document.

Do you agree with the proposed values?

- ○ Yes, I agree
- ○ Yes, I mostly agree
- ○ No, I mostly disagree
- ○ No, I disagree
- ◉ I do not know / I have no opinion

13. Questions related to future stages of the project

* 13.1 Contribution to questions related to future stages of the project

Do you want to contribute to questions related to future stages of the project? This section of the questionnaire contains 9 main questions.

- ◉ Yes
- ○ No, I want to skip this section of the questionnaire

Questions related to future stages of the project

* 13.2 Extrinsic durability

This subject is out of scope of the JRC’s Preparatory Study.

Would you support consideration of extrinsic durability in the delegated act on textile apparel?

- ○ Yes, I agree
- ○ Yes, I mostly agree
- ◉ No, I mostly disagree
- ○ No, I disagree
- ○ I do not know / I have no opinion

* 13.2.1 Why?

Text of 1 to 5000 characters will be accepted

There is no evidence that durability impacts production levels and therefore environmental impact. This is durability as such not divided into subgroups (intrinsic, extrinsic, etc.). Instead of trying to define or measure durability, we suggest measuring Duration of Service. Durability and Duration of Service are both strongly impacted by quantities. It’s therefore necessary to not only take design parameters but also quantities into consideration. F ex if you love silk dresses and have 300 at the age of 60, it is unlikely that you will be able to use them up, regardless of their extrinsic durability. The discussion in PEFCRs and in the French EcoBalyse show difficult discussions around extrinsic durability might be, both on how to define, choose and measure. It might be a better choice to work more on marketing strategies and legislate marketing.

* 13.2.2 In your view, how should the extrinsic durability of a product be determined?

Text of 1 to 5000 characters will be accepted

Concentrating on Duration of Service (DoS), you don't need to define it. The DoS can be linked to a specific brand, business strategy etc., and improvements can be up to the brands to implement, if you set targets for the outcome. For some products it might be improvements in sizing, for others marketing, for others design. We believe the industry itself would be more fit to fix this, rather than one size fits all. This is the thinking behind for a Targeted Producer Responsibility, but could also be used in ESPR. This entails dating, producer name and waste audits or other product-based methods for measuring Duration of Service.

13.3 Score of a product

This subject is out of scope of the JRC's Preparatory Study.

In the delegated act on textile apparel, there could be many ways of disclosing a score/s to define the performance of a product. Which of the following options do you consider most appropriate for textile apparel?

- ○ Disaggregated values specifying the information on robustness, recyclability, recycled content, and environmental impacts.
- ○ Disaggregated values specifying the information on robustness, recyclability, recycled content, environmental impacts, and extrinsic durability.
- ○ Only an "expanded ESPR score", which would combine information on robustness, recyclability, recycled content, environmental impacts, and extrinsic durability in one aggregated value.
- ○ The referred "expanded ESPR score" alongside with the specific information on robustness, recyclability, recycled content, environmental impacts, and extrinsic durability.
- ○ Only an "ESPR score", which would combine information on robustness, recyclability, recycled content, and environmental impacts into one aggregated value.
- ○ The referred "ESPR score" alongside with the specific information on robustness, recyclability, recycled content, and environmental impacts.
- ○ Only a "circularity score", which would combine information on robustness, recyclability, and recycled content into one aggregated value.
- ○ The referred "circularity score" alongside with the specific information on robustness, recyclability and recycled content.
- ◉ Other
- ○ I have no opinion

* 13.3.3 Please detail your proposal

Text of 1 to 5000 characters will be accepted

Amongst the suggestions, the ones that support detailed and accurate information, are the best. Environmental impact lacks a system or good tool for measuring this, and can therefore not be included as the system stands today. The same is the case for extrinsic durability. For consumers, the level of pilling might be better in the form of information than an average robustness score. And for the products where this is an actual potential problem. The information should therefore be specific and related to problems that often occur for the product group or for a given fiber or material. It might also be of interest for consumers to know something more about the production, such as precise knowledge on origin, how many items of the same design are produced and enter the market, how much the company invests in marketing as opposed to real-life testing of the products, etc. We would also support a definition of ultra fast fashion and fast fashion, based on the average Duration of Service of the brands' products, and inform the consumer which group the company belongs under.

KLEPP, I. G., MÅGE, J., HVASS, K. K. & TOBIASSON, T. S. 2023a. How to make sure Extended Producer Responsibility becomes a silver bullet [Online]. Oslo: OsloMet. Available: https://clothingresearch.oslomet.no/2022/10/24/how-to-make-sure-extended-producer-responsibility-becomes-a-silver-bullet/ [Accessed 8.5.23 2023].
KLEPP, I. G., TOBIASSON, T. S., MÅGE, J. & HVASS, K. K. 2023b. Briefing paper, Deployment of Targeted Producer Responsibility (TPR): Questions and Answers. SIFO.

* 13.5 Date of application of DO1 on robustness

What should be the date of entry into application in a possible future delegated act of provisions associated to DO1 on robustness? Why?

Text of 1 to 5000 characters will be accepted

No opinion.

* 13.6 Date of application of DO2 on recyclability

What should be the date of entry into application in a possible future delegated act of provisions associated to DO2 on recyclability? Why?

Text of 1 to 5000 characters will be accepted

No opinion.

* 13.7 Date of application of DO3 on recycled content

What should be the date of entry into application in a possible future delegated act of provision associated to DO3 on recycled content? Why?

Text of 1 to 5000 characters will be accepted

No opinion.

* 13.8 Date of application of DO4.1 on environmental footprint

What should be the date of entry into application in a possible future delegated act for provisions associated to DO4.1 on environmental footprint? Why?

Text of 1 to 5000 characters will be accepted

No opinion.

* 13.9 Date of application of DO4.2 on environmental footprint

What should be the date of entry into application in a possible future delegated act for provisions associated to DO4.2 on carbon footprint? Why?

Text of 1 to 5000 characters will be accepted

No opinion.

* 13.10 EPR fee modulation

Should the EPR fee modulation be based on information requirements for:

- ○ Recyclability
- ○ Robustness
- ○ Recycled content
- ◉ Other
- ○ I have no opinion

*** 13.10.1 Please specify the information requirement you refer to**

Text of 1 to 5000 characters will be accepted

cost of reuse/recycling paths (Targeted Producer Responsibillity (Klepp et al., 2023a, Klepp et al., 2023b). In addition to this, it might be possible to modulate the fee on the production volumes, product price and share of fossil fuel-based materials. It is possible to exclude the small and local producers from the EPR system, for the rest base this preferably on Duration of Service, price, use of synthetics and volumes.
KLEPP, I. G., MÅGE, J., HVASS, K. K. & TOBIASSON, T. S. 2023a. How to make sure Extended Producer Responsibility becomes a silver bullet [Online]. Oslo: OsloMet. Available: https://clothingresearch.oslomet.no/2022/10/24/how-to-make-sure-extended-producer-responsibility-becomes-a-silver-bullet/ [Accessed 8.5.23 2023].
KLEPP, I. G., TOBIASSON, T. S., MÅGE, J. & HVASS, K. K. 2023b. Briefing paper, Deployment of Targeted Producer Responsibility (TPR): Questions and Answers. SIFO.

14. Parts of the working document not addressed above

*** 14.1 Contributions related to other parts of the working document**

Do you want to comment other elements / parts of the working document?

- ◉ Yes
- ○ No, I want to skip this section of the questionnaire

Comments about the parts of the working document not addressed above

Comments reported in this section answering questions addressed in the previous sections of the questionnaire will not be processed.

This section is **ONLY** dedicated to topics not addressed by previous questions.

14.2 Comment 1

14.2.1 Which section you would like to comment?

If you want to comment the annexes, please report the main section the annex refers to, e.g. report section 10.1 if you want to comment the supporting information of section 13.11.

- (●) 1. Introduction
- ( ) 2. Definitions
- ( ) 3. Scope
- ( ) 4. Legislation
- ( ) 5. Market analysis
- ( ) 6. User Behaviour
- ( ) 7. Current EU Ecolabel criteria for textile products
- ( ) 8. Public procurement and current EU voluntary Green Public Procurement criteria
- ( ) 9.1 Relevant product aspects
- ( ) 9.2.1 Analysis of technologies in the context of physical durability
- ( ) 9.2.2 Analysis of technologies in the context of maintenance
- ( ) 9.2.3 Analysis of technologies in the context of repairability
- ( ) 9.2.4 Analysis of technologies in the context of waste management
- ( ) 9.2.5 Analysis of technologies in the context of recyclability and recycled content
- ( ) 9.2.6 Analysis of technologies in the context of environmental impacts
- ( ) 9.2.7 Analysis of technologies in the context of presence of substances of concern
- ( ) 9.3 Mutual influence of product aspects and product categorization
- ( ) 10.1 Environmental and economic analysis – impacts via Life Cycle Thinking approach
- ( ) 10.2 Fragmented fibres release into the environment
- ( ) 11.1 Definition of design options
- ( ) 11.2 Combination of design options: paths
- ( ) 11.3 Main conclusions of the assessment of the design options
- ( ) 12.1 ESPR and chemical substances
- ( ) 12.2 Methodology: substances and substances of concern
- ( ) 12.3 Substances on textile apparel

14.2.2. Which line does your comment refer to?

Text of 1 to 50 characters will be accepted

Lines 20-24 and lines 31-35

14.2.3 Please report your comment

Text of 1 to 5000 characters will be accepted

In the Introduction, it is stated that ‘The ESPR and EU Ecolabel requirements must be coherent and synergic to guarantee that products awarded the EU Ecolabel comply with the ESPR requirements set in the relevant delegated act.’ The Introduction also states that ‘The PEFCR A&F can be used by the industry to voluntarily quantify the environmental impacts of specific textile products. The EC follows the development of the PEFCR A&F project as an observer.’ As we understand, the aim of the PEFCR A&F is to underpin a potential labelling scheme (which also has been described in the 3rd Milestone, but then related to the ESPR parameters, some of which partially overlap with PEFCR A&F). Are there then two pathways for a ‘energy-labelling-like’ label? Or will

they be compliant/the same? Also, we would like to point to several test-cases of PEFCR A&F that have produced 'perverse' results (quote from one of the brands). The first one is a case where the data from a Nordic Swan (which has much the same criteria as the EU Ecolabel) labelled 100 percent European made/Norwegian wool sweater from the brand Devold was fed in to the Glimpact database alongside a 100 percent polyester sweater made in China (from Shein), with the following result: The Shein sweater came out 87 percent more 'environmentally friendly' than the Devold sweater. The second is a Norwegian project, led by NF&TA, Trimco Group and Green Score Capital, comparing products using the PEF 3.0 database. The results show that a fleece polyester jacket scored 1476 PEF points and Merino sweater scored 18264 PEF points. For the polyester fleece jacket, the raw material is estimated to constitute 17.52% of the PEF score, 24.23% of the GHG emissions, while transformation, manufacturing and finishing constituted ca 79% of the PEF score, and 70% of GHG emissions. For the wool sweater, raw material formation constituted 91.51% of the PEF score, 84.52% of the GHG emission score, while transformation, manufacturing and finishing constituted ca 7% of the PEF score and 13% of GHG emissions. We think this clearly shows how confusing for consumers a potential aggregated score or rankings from A to E using EU's current LCA-based EF approach when such results are possible. All legislation around green claims makes it clear that information must be clear, understandable and verifiable, and this certainly does not seem so in this specific example. This was made very clear by the Norwegian Consumer Authority when they ruled against the Sustainable Apparel Coalition (later Cascale) who had used the Higg Index (later Worldly) to back claims that an organic cotton product was less thirsty than a conventional cotton product. The same outdated data used by Higg/Worldly has underpinned PEFCR A&F. (Klepp and Haugsrud, 2024) That said, we are happy that the fiber formation stage is suggested out of scope as long as this is planned to be done based on LCA-approach. An alternative would be to use simple questions such as: Is the fiber fossil based? Is it biodegradable? And has it been and is it projected to increase its market share? Or another more simplified approach: Raw material: is the raw fibre material biogenic? E.g., what %? Raw material: is the raw fibre material biodegradable under standard conditions? Manufacturing: has it been treated with/imbued with toxic chemicals during manufacture? End of life: is it designed for positive end-of-life (clear pathways for re-use, re-cycle, up-cycle etc). All this would more effectively capture real-life impacts. Of course,, when it comes to fiber traceability, which is an issue in EU's Ecolabel and the Nordic Swan, we would suggest that the provenance of the synthetics is becoming equally important to understand. If Chinese polyester is based on Russian oil; then this can quickly be seen as an issue. In the current challenging geopolitical situation, war strategic preparedness for fibers and manufacturing is once again on the agenda, including securing local resources and production. This will become increasingly important and may enter into f ex public procurement, which we see Sweden is putting on the agenda.

KLEPP, I. G. & HAUGSRUD, I. 2024. Who can stop the greenwashing. In: SKJERVEN, A., LØVBAK BERG, L., NIELSEN, L. M. & STUEDAHL, D. (eds.) Mediating Sustainability in the Consumer Society. Oxon: Routledge.

14.2.4 Do you want to add another comment?

- (●) Yes
- ( ) No

14.3 Comment 2

14.3.1 Which section you would like to comment?

If you want to comment the annexes, please report the main section the annex refers to, e.g. report section 10.1 if you want to comment the supporting information of section 13.11.

- ( ) 1. Introduction
- (●) 2. Definitions
- ( ) 3. Scope

- 4. Legislation
- 5. Market analysis
- 6. User Behaviour
- 7. Current EU Ecolabel criteria for textile products
- 8. Public procurement and current EU voluntary Green Public Procurement criteria
- 9.1 Relevant product aspects
- 9.2.1 Analysis of technologies in the context of physical durability
- 9.2.2 Analysis of technologies in the context of maintenance
- 9.2.3 Analysis of technologies in the context of repairability
- 9.2.4 Analysis of technologies in the context of waste management
- 9.2.5 Analysis of technologies in the context of recyclability and recycled content
- 9.2.6 Analysis of technologies in the context of environmental impacts
- 9.2.7 Analysis of technologies in the context of presence of substances of concern
- 9.3 Mutual influence of product aspects and product categorization
- 10.1 Environmental and economic analysis – impacts via Life Cycle Thinking approach
- 10.2 Fragmented fibres release into the environment
- 11.1 Definition of design options
- 11.2 Combination of design options: paths
- 11.3 Main conclusions of the assessment of the design options
- 12.1 ESPR and chemical substances
- 12.2 Methodology: substances and substances of concern
- 12.3 Substances on textile apparel

14.3.2 Which line does your comment refer to?

Text of 1 to 50 characters will be accepted

Lines 167 – 171 Table 2 Lines 228 - 235

14.3.3 Please report your comment

Text of 1 to 5000 characters will be accepted

We do not agree with the definition of textile apparel, which includes the following. ‘to express their personal and professional identity and/or belonging to a specific social group, with symbolic meanings and aesthetic values’. Yes, for some people and in some situations, this is the case, but a lot of apparel does not have this function and it does not apply to people in general. As JRC also writes, it is not legal in Europe to walk around naked, apparel is not something you choose to use. The most important function, is to fulfill social norms, make the body socially acceptable. This can also be stated as apparel being part of social praxis, and that this praxis will differ with age, gender and in different social situations.
KLEPP, I. G. & HAUGSRUD, I. 2024. Who can stop the greenwashing. In: SKJERVEN, A., LØVBAK BERG, L., NIELSEN, L. M. & STUEDAHL, D. (eds.) Mediating Sustainability in the Consumer Society. Oxon: Routledge.

Environmental impacts in Table 2
‘Any change to the environment, whether adverse or beneficial, wholly or partially resulting from a product during its life cycle’ used as a definition for evaluating the environmental impacts do not align with LCA-based measuring of environmental impacts, that are purely negative; none of the positive impacts are included.

Product technologies divide products into three categories: Base case (BC), Best available technology (BAT) and Best not yet available technology (BNAT). We find this way of categorizing apparel almost comical, as it does not in any way capture the functions of apparel, nor the complexity related to apparel properties. How does this category-division actually inform consumers, researchers or authorities in a useful way that could lead to lowering the environmental footprint of apparel? The whole exercise seems to be based on the energy-labeling scheme, attempting to transfer this to products that are seldom to never bought as replacements for something that fails. In the 3rd Milestone, we see a slight glimmer of this having relevance when BAT refers to production in Europe and attempts to tie in fiber production related to geography, but with the lack of traceability and the complex supply-chains acknowledged, the whole idea flounders. Also, this would need to include the sources/provenance of synthetic fibers, and with the current lack of data being seen as a hinder in differentiating BC and BAT would be even further confounded. In conclusion we find the idea of BC, BAT and BNAT not thought through in a meaningful way that informs ecodesign for apparel. However, if applied to ecodesign for more sustainable products, several other scenarios could be explored that make more sense to the consumer, where products that we need to limit access to the market are WC (worst case), f ex. Or BAT or BNAT is more about products using local resources, produced locally, in small runs (where robustness tests would not be necessary nor feasible) and with a date on the label – and accompanied by a 20-year guarantee for example.

14.3.4 Do you want to add another comment?

- (●) Yes
- ( ) No

14.4 Comment 3

14.4.1 Which section you would like to comment?

If you want to comment the annexes, please report the main section the annex refers to, e.g. report section 10.1 if you want to comment the supporting information of section 13.11.

- ( ) 1. Introduction
- ( ) 2. Definitions
- ( ) 3. Scope
- ( ) 4. Legislation
- (●) 5. Market analysis
- ( ) 6. User Behaviour
- ( ) 7. Current EU Ecolabel criteria for textile products
- ( ) 8. Public procurement and current EU voluntary Green Public Procurement criteria
- ( ) 9.1 Relevant product aspects
- ( ) 9.2.1 Analysis of technologies in the context of physical durability
- ( ) 9.2.2 Analysis of technologies in the context of maintenance
- ( ) 9.2.3 Analysis of technologies in the context of repairability
- ( ) 9.2.4 Analysis of technologies in the context of waste management
- ( ) 9.2.5 Analysis of technologies in the context of recyclability and recycled content
- ( ) 9.2.6 Analysis of technologies in the context of environmental impacts
- ( ) 9.2.7 Analysis of technologies in the context of presence of substances of concern
- ( ) 9.3 Mutual influence of product aspects and product categorization

- 10.1 Environmental and economic analysis – impacts via Life Cycle Thinking approach
- 10.2 Fragmented fibres release into the environment
- 11.1 Definition of design options
- 11.2 Combination of design options: paths
- 11.3 Main conclusions of the assessment of the design options
- 12.1 ESPR and chemical substances
- 12.2 Methodology: substances and substances of concern
- 12.3 Substances on textile apparel

14.4.2 Which line does your comment refer to?

Text of 1 to 50 characters will be accepted

Lines 1249 – 1353 Lines 1711 – 1715

14.4.3 Please report your comment

Text of 1 to 5000 characters will be accepted

This is an excellent analysis of how Europe has ended up in the current conundrum with way too much apparel being imported. When it is clear that the phasing out of the Multi Fibre Arrangement (MFA) is what has opened up for the dramatic increase in production mainly in China, and that this is tied closely to the availability of cheap synthetics, would it not be an obvious conclusion that these two developments hold the key to actually stemming the influx of apparel products? When the 3rd Milestone authors write “The evolution of fibre production is mainly driven by the increase in production of polyester” and “For the majority of the product categories, the increase in mass is very much larger than the increase in value. This could flag the purchase every year of more products at lower prices” – the drivers alongside the MFA’s disappearance – are made very clear. Shouldn’t JRC take this seriously and look for levers that could reverse this. The current levers in the 3rd Milestone do not directly address these rather glaring causes of the development, instead the proposals attempt to address the symptoms, though even this neither seems wholeheartedly nor efficiently done. Later in the document (lines 4182 – 4183), JRC writes: “The business model that characterizes the BAT promotes a production rate similar to that before 2004, when the apparent consumption of EU was about half of the current one.” One of the few places we find BAT helpful, and we encourage JRC to think how this can be done. There are obviously other policy tools, such as quotas, that would make this feasible. There is no correlation documented that more robust or recyclable products will ensure downsizing the market to the 2004 level. Both Design Options will open up the field for synthetics, and therefore more – not less.
JRC writes: “Currently, there is no established system that allows the direct measurement of the service lifespan of textile apparel. The information available in the literature focuses on the possession span, which refers to the time a single user keeps the item, and the duration in use, which refers to how much time the owner uses the item (Table 32). This information is collected via surveys where users are asked to provide their estimates.”
The most reliable data is based on specific questions about single examples such as in wardrobe methods and waste audit interviews. See https://clothingresearch.oslomet.no/wp-content/uploads/sites/1026/2024/04/NewMethod.pdf

14.4.4 Do you want to add another comment?

- (●) Yes
- ( ) No

14.5 Comment 4

14.5.1 Which section you would like to comment?

If you want to comment the annexes, please report the main section the annex refers to, e.g. report section 10.1 if you want to comment the supporting information of section 13.11.

- ○ 1. Introduction
- ○ 2. Definitions
- ○ 3. Scope
- ○ 4. Legislation
- ○ 5. Market analysis
- ◉ 6. User Behaviour
- ○ 7. Current EU Ecolabel criteria for textile products
- ○ 8. Public procurement and current EU voluntary Green Public Procurement criteria
- ○ 9.1 Relevant product aspects
- ○ 9.2.1 Analysis of technologies in the context of physical durability
- ○ 9.2.2 Analysis of technologies in the context of maintenance
- ○ 9.2.3 Analysis of technologies in the context of repairability
- ○ 9.2.4 Analysis of technologies in the context of waste management
- ○ 9.2.5 Analysis of technologies in the context of recyclability and recycled content
- ○ 9.2.6 Analysis of technologies in the context of environmental impacts
- ○ 9.2.7 Analysis of technologies in the context of presence of substances of concern
- ○ 9.3 Mutual influence of product aspects and product categorization
- ○ 10.1 Environmental and economic analysis – impacts via Life Cycle Thinking approach
- ○ 10.2 Fragmented fibres release into the environment
- ○ 11.1 Definition of design options
- ○ 11.2 Combination of design options: paths
- ○ 11.3 Main conclusions of the assessment of the design options
- ○ 12.1 ESPR and chemical substances
- ○ 12.2 Methodology: substances and substances of concern
- ○ 12.3 Substances on textile apparel

14.5.2 Which line does your comment refer to?

Text of 1 to 50 characters will be accepted

Lines 2321 - 2358

14.5.3 Please report your comment

Text of 1 to 5000 characters will be accepted

The discussion here is only around ‘emotional durability’ which later in the document is called extrinsic durability. However, the discussion is misguided, as ‘social durability’ would be a more interesting entry point for a discussion of ‘non-physical’ aspects of durability. That said, we have commented the durability issue in the main questionnaire, and as robustness seems to be the default proxy for physical (intrinsic) durability, perhaps

social robustness could be explored as a concept, based on the actual reasons for discarding apparel. How stains, bad fit, trend-pieces that have lost their appeal could be captured under the concept of 'social robustness' is perhaps something to discuss in the 4th Milestone. Social is after all better than emotional, but our main argument is that durability in and of itself is not the problem we currently need to address. The problem is the quantities. If the quantities are allowed to continue to increase, apparel simply doesn't need to be durable. The Duration of Service depends on the volumes entering the market, and as long as they are increasing, the less important durability will become. If we want durability to make sense, it's therefore important to do something with the quantities. More durable will not reduce volumes, but create even more (in increased weight as more durable clothes might be achieved through heavier yarns and therefore also heavier garments).
Also under 9.1 (Table 41) on Expected generation of waste based on 'required characteristics' for apparel products under ESPR it says: "(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." There is no data that supports the causality here. Which we have pointed to several times in the questionnaire.

14.5.4 Do you want to add another comment?

- (●) Yes
- ( ) No

14.6 Comment 5

14.6.1 Which section you would like to comment?

If you want to comment the annexes, please report the main section the annex refers to, e.g. report section 10.1 if you want to comment the supporting information of section 13.11.

- ( ) 1. Introduction
- ( ) 2. Definitions
- ( ) 3. Scope
- ( ) 4. Legislation
- ( ) 5. Market analysis
- ( ) 6. User Behaviour
- (●) 7. Current EU Ecolabel criteria for textile products
- ( ) 8. Public procurement and current EU voluntary Green Public Procurement criteria
- ( ) 9.1 Relevant product aspects
- ( ) 9.2.1 Analysis of technologies in the context of physical durability
- ( ) 9.2.2 Analysis of technologies in the context of maintenance
- ( ) 9.2.3 Analysis of technologies in the context of repairability
- ( ) 9.2.4 Analysis of technologies in the context of waste management
- ( ) 9.2.5 Analysis of technologies in the context of recyclability and recycled content
- ( ) 9.2.6 Analysis of technologies in the context of environmental impacts
- ( ) 9.2.7 Analysis of technologies in the context of presence of substances of concern
- ( ) 9.3 Mutual influence of product aspects and product categorization
- ( ) 10.1 Environmental and economic analysis – impacts via Life Cycle Thinking approach
- ( ) 10.2 Fragmented fibres release into the environment
- ( )

11.1 Definition of design options

- 11.2 Combination of design options: paths
- 11.3 Main conclusions of the assessment of the design options
- 12.1 ESPR and chemical substances
- 12.2 Methodology: substances and substances of concern
- 12.3 Substances on textile apparel

14.6.2 Which line does your comment refer to?

Text of 1 to 50 characters will be accepted

Lines 2454 – 2474

14.6.3 Please report your comment

Text of 1 to 5000 characters will be accepted

Section 7.3 states that “The ESPR and EU Ecolabel requirements must therefore be coherent and synergic to guarantee that products awarded the EU Ecolabel comply with the ESPR requirements set in the relevant delegated act. Therefore, the revision of the EU Ecolabel criteria for textile products remains regulated by the EU Ecolabel Regulation, but it should also follow the framework of the ESPR.” How this last comment is supposed to be implemented is highly unclear, and even more so in light of this: “the same approach (relating to function-blindness) cannot be used in the PS because ecodesign requirements must include aspects like durability and recycled content, which are closely related to the function and use of the textile product”. Are ecodesign requirements still about durability? We thought they had changed to robustness? And why would the EU Ecolabel demand recycled content in products, when their strict quality-testing would disfavor natural fibers if they were mandated to contain recycled content? We therefore do not agree that the EU Ecolabel should do the work of aligning with ESPR, however, ESPR can very well align more with the EU Ecolabel. Also, if ESPR is in any way or form building on PEFCR A&F, there is no reason for the EU Ecolabel to look in that direction.

14.6.4 Do you want to add another comment?

- (●) Yes
- ( ) No

14.7 Comment 6

14.7.1 Which section you would like to comment?

If you want to comment the annexes, please report the main section the annex refers to, e.g. report section 10.1 if you want to comment the supporting information of section 13.11.

- 1. Introduction
- 2. Definitions
- 3. Scope
- 4. Legislation
- 5. Market analysis
- 6. User Behaviour
- 7. Current EU Ecolabel criteria for textile products

- 8. Public procurement and current EU voluntary Green Public Procurement criteria
- 9.1 Relevant product aspects
- (●) 9.2.1 Analysis of technologies in the context of physical durability
- 9.2.2 Analysis of technologies in the context of maintenance
- 9.2.3 Analysis of technologies in the context of repairability
- 9.2.4 Analysis of technologies in the context of waste management
- 9.2.5 Analysis of technologies in the context of recyclability and recycled content
- 9.2.6 Analysis of technologies in the context of environmental impacts
- 9.2.7 Analysis of technologies in the context of presence of substances of concern
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- 11.1 Definition of design options
- 11.2 Combination of design options: paths
- 11.3 Main conclusions of the assessment of the design options
- 12.1 ESPR and chemical substances
- 12.2 Methodology: substances and substances of concern
- 12.3 Substances on textile apparel

14.7.2 Which line does your comment refer to?

Text of 1 to 50 characters will be accepted

Lines 2916 – 2918 Lines 2935 – 36 Lines 3130 – 40

14.7.3 Please report your comment

Text of 1 to 5000 characters will be accepted

Here we find claims that have no data that underpins what is written: “Users influence the physical durability of textile apparel mainly at the moment of the purchase when choosing a product with specific characteristics. Purchasing decisions are an important factor in shaping market trends, as consumer preferences can drive brands to offer more physically durable products.” It is through use, more than the act of purchasing, that Duration of Service or durability is established or ‘influenced’. And there is certainly no correlation between consumer preferences and the durability of products that are offered on the market. For the most part consumers strive to find apparel they like – and it is what they like and use that makes them ultimately ‘durable’. We do find one sentence here that stands out as an observation that should have been taken more into account: “All in all, although physical durability refers to intrinsic properties of textile apparel, currently users have no way to access this information.” This is important and to make available such information is a good thing. The more precise and concrete the better (f ex level of pilling)
JRC writes, when arguing for simplified parameters for failure modes: “A more exhaustive analysis of the main failure modes would lead to include in the proposed framework tests related to abrasion, tear, and seam slip. However, products included in the scope of the PS exhibit very different performances in terms of these parameters according to their specific application and the function that they are meant to fulfil. This would lead to the need to define a disproportionate number of categories to describe the numerous types of functionally distinct products. For example, following this reasoning, t-shirts should be classified according to their leisure and sport application. Among the leisure t-shirts a distinction should further be made between those with thin and very transpirable fabric used in hot summer days and thick ones used in winter, worn under a jacket or a

midlayer. Among sport t-shirts, a distinction should also be made for the numerous sports requiring specific characteristics according to the stresses caused by the specific sport. This line of thinking would lead to many more categories than the 34 segments identified in the PEFCR A&F (see section 9.2.1.5), resulting in an obviously unmanageable level of complexity from the regulatory standpoint." The argument here is about the complexity between products and use, and it is exactly therefore we argue that Duration of Service is much better than a durability or robustness score at a product level. This is also the reason why it is better to concentrate on specific problems related to specific product groups, and avoid this one-size-fits-all approach. And our approach would most surely ease the burden for SMEs and micro-sized businesses where demanding all products are tested in the same way, no matter their function, will be an unnecessary burden for them. VANACKER, H., LEMIEUX, A.-A., LAITALA, K., DINDI, M., BONNIER, S. & LAMOURI, S. 2025. Understanding garment durability through local lenses: a participatory study with communities across the globe. Scientific Reports, 15, 34962.

14.7.4 Do you want to add another comment?

- (●) Yes
- ( ) No

14.8 Comment 7

14.8.1 Which section you would like to comment?

If you want to comment the annexes, please report the main section the annex refers to, e.g. report section 10.1 if you want to comment the supporting information of section 13.11.

- ( ) 1. Introduction
- ( ) 2. Definitions
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- ( ) 5. Market analysis
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- (●) 9.2.3 Analysis of technologies in the context of repairability
- ( ) 9.2.4 Analysis of technologies in the context of waste management
- ( ) 9.2.5 Analysis of technologies in the context of recyclability and recycled content
- ( ) 9.2.6 Analysis of technologies in the context of environmental impacts
- ( ) 9.2.7 Analysis of technologies in the context of presence of substances of concern
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- ( ) 10.2 Fragmented fibres release into the environment
- ( ) 11.1 Definition of design options
- ( ) 11.2 Combination of design options: paths

- 11.3 Main conclusions of the assessment of the design options
- 12.1 ESPR and chemical substances
- 12.2 Methodology: substances and substances of concern
- 12.3 Substances on textile apparel

14.8.2 Which line does your comment refer to?

Text of 1 to 50 characters will be accepted

Lines 3375 – 3379

14.8.3 Please report your comment

Text of 1 to 5000 characters will be accepted

JRC writes: “Table 43 and Figure 25 in section 9.2.1.3 report that the main discard causes are generally combined and are colour and fabric-related (e.g. pilling, breakdown, stains etc). Some of these failure modes could be tackled by a specific design, e.g. making a more robust fabric, but others are largely dependent on the way the product is maintained and used, e.g. the presence of stains.” Yes, this is the case. Therefore, it is less than the 1/3 discarded for intrinsic quality reasons that can be solved by design. This needs to be further researched to establish exactly how much can be solved by design-interventions and how much is related f ex to accidents such as staining or careless care, such as throwing that red sock in with your white t-shirts. It’s possible to use waste audits, wardrobe studies and waste audit interviews to find out how much of this 1/3 has failures that are design-related. In the questionnaire we pointed to a recently published PhD, which found the main ‘failure’ to be pilling, but also issues related to physical damage to the clothing which cannot necessarily be ‘designed out’, such as stains or odors. This article summarizes the findings:
Sigaard, Anna Schytte ; Laitala, Kirsi (2025). Repairability of clothing and textiles: Consumer practices and policy implications. International Journal of Sustainable Fashion & Textiles. Vol. 4. https://doi.org/10.1386/sft_00064_1
This describes the method that could inform more research on this, in order to understand what can and what cannot be ‘designed out’:
https://clothingresearch.oslomet.no/wp-content/uploads/sites/1026/2024/04/NewMethod.pdf

14.8.4 Do you want to add another comment?

- (●) Yes
- ( ) No

14.9 Comment 8

14.9.1 Which section you would like to comment?

If you want to comment the annexes, please report the main section the annex refers to, e.g. report section 10.1 if you want to comment the supporting information of section 13.11.

- 1. Introduction
- 2. Definitions
- 3. Scope
- 4. Legislation
- 5. Market analysis

- ○ 6. User Behaviour
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- ○ 8. Public procurement and current EU voluntary Green Public Procurement criteria
- ○ 9.1 Relevant product aspects
- ○ 9.2.1 Analysis of technologies in the context of physical durability
- ○ 9.2.2 Analysis of technologies in the context of maintenance
- ○ 9.2.3 Analysis of technologies in the context of repairability
- ◉ 9.2.4 Analysis of technologies in the context of waste management
- ○ 9.2.5 Analysis of technologies in the context of recyclability and recycled content
- ○ 9.2.6 Analysis of technologies in the context of environmental impacts
- ○ 9.2.7 Analysis of technologies in the context of presence of substances of concern
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- ○ 12.2 Methodology: substances and substances of concern
- ○ 12.3 Substances on textile apparel

14.9.2 Which line does your comment refer to?

Text of 1 to 50 characters will be accepted

Lines 3656 – 3662

14.9.3 Please report your comment

Text of 1 to 5000 characters will be accepted

JRC points to this, which is important and asks for better definitions of the business models that incentivize over-production: “Nevertheless, the study of the literature and the consultation with stakeholders reveals that business models exist that incentivise overconsumption and overproduction as described in section 9.2.4.2. However, other stakeholders also related intentional overproduction with inefficient production and claimed it should not be considered as the most common model in the industry. Due to lack of evidence that allow the numerical estimation of the effects generated by different business models, the authors can only report a qualitative analysis. Thus, the BC, BAT and BNAT related to the waste generation cannot be defined at product-level.” We would claim that this could be defined at a brand level, however, which would enable a good definition of exactly the business models. This could be done through waste audits and other similar methods, ensuring valuable knowledge and data. This again is dependent on ensuring the brand is clearly marked, along with dating of the products.

14.9.4 Do you want to add another comment?

- ◉ Yes
- ○ No

14.10 Comment 9

14.10.1 Which section you would like to comment?

If you want to comment the annexes, please report the main section the annex refers to, e.g. report section 10.1 if you want to comment the supporting information of section 13.11.

- ○ 1. Introduction
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- ○ 3. Scope
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- ○ 5. Market analysis
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- ○ 12.3 Substances on textile apparel

14.10.2 Which line does your comment refer to?

Text of 1 to 50 characters will be accepted

Lines 5000 – 5001 Lines 5083 - 5101

14.10.3 Please report your comment

Text of 1 to 5000 characters will be accepted

JRC are right when they define microplastics as a health issues: “Humans are largely exposed to the MP because can potentially breathe air with MP, drink water with MP and eat food with MP.” Microplastics as plastic waste, is however an environmental issue. The problem arises when it is the assumed measuring of microplastic shedding in the many stages of textiles or over all the fragmented fibers that they find impossible to

quantify. They do not take into consideration that the main source of plastic pollution and eventually down the line microplastics is the End of Life stage, both landfills and textile waste ending up in nature in general – willfully or by mistake. Therefore, it is much easier than assumed to actually measure microplastics, if we are able to estimate how much of synthetic apparel is not properly handled when disposed of. Recent peer-reviewed evidence indicates that, by mass, the largest source of apparel-related plastic leakage is mismanaged synthetic clothing waste (including exports to secondary markets with inadequate waste management). For 2019, total plastic leakage from the global apparel value chain is estimated at about 8.3 Mt/year; by mass, microfiber releases during synthetic fiber production and washing are less than 1.5% (about 0.11 Mt/year). Effective policy approach should focus first on reducing the amount of persistent plastic textiles placed on the market, and on ensuring safe end-of-life routes. In parallel, the EU should accelerate development of a harmonized framework for assessing biodegradability/persistence and chemical safety across different parts of the environment (such as seawater, freshwater, soil and sediment), so future PEF/labeling tools can treat plastics and natural fibers fairly and transparently. Therefore, explicitly distinguish between plastic microfibers (synthetic polymer) and non-plastic fibers (e.g., wool, cotton, bast fibers), which have fundamentally different persistence profiles. Also include key additives/finishes relevant to persistence, toxicity, recycling and biodegradation (e.g., durable water repellents, antimicrobial treatments, flame retardants), using harmonized substance categories where feasible. Lastly, consumer-facing information should be short and factual. Example wording:
“Contains synthetic (plastic) fibers. If released to the environment, plastic fibers persist and can become microplastics. Follow care and end-of-life instructions.”

(Kounina, A. et al. (2024). The global apparel industry: a significant, yet overlooked source of plastic leakage. Nature Communications. https://doi.org/10.1038/s41467-024-49441-4)
https://iwto.org/wp-content/uploads/2026/03
/IWTO_Position_Paper_Microplastics_JRC_3rd_Milestone_03112026.pdf

14.10.4 Do you want to add another comment?

- (●) Yes
- ( ) No

14.11 Comment 10

14.11.1 Which section you would like to comment?

If you want to comment the annexes, please report the main section the annex refers to, e.g. report section 10.1 if you want to comment the supporting information of section 13.11.

- ( ) 1. Introduction
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14.11.2 Which line does your comment refer to?

Text of 1 to 50 characters will be accepted

Lines 5395 – 5401

14.11.3 Please report your comment

Text of 1 to 5000 characters will be accepted

We find it interesting that JRC have adopted some of our suggestions related to recyclability, which we wished to propose to products that actually need to be addressed as ‘’worst case’ and therefore limited access to market. JRC write: “The only component found to significantly impede recycling is elastane, when present above a specific threshold. Despite this limitation, a prohibition on elastane use is not considered proportionate nor feasible, as the material imparts essential functional properties to textiles that cannot be eliminated without compromising the performance of certain products (further analysis of elastane can be found in section 12.3.8). Instead, its use should be minimised and limited to applications where it is most necessary. The established information requirement will indirectly discourage excessive use, as products containing elastane above the defined limit will be labelled as “Non-recyclable”, as described in the following section.” We would encourage JRC to discuss the possibility to restrict the use of elastane all together, not just saying the limit must be below 15 %, in certain products and the possible effects of that. As elastane is one of the few things that makes f ex jeans ‘unrepairable’, and therefore not fit for long use ore reuse, this would take a problematic product off the market. It would also increase reuse of elastane-free jeans, as people prefer ‘worn-in’ jeans and the second-hand market for these products would probably increase. This would fit into our proposal that ecodesign should target the most problematic products, not attempt to ‘shoot sparrows with a canon’. In the questionnaire we have suggested other products that should have performance requirements in the form of limiting access to the European market:

- Big, non-removable prints f ex on merch
- Easy to lose plastic items f ex sequins
- Pre-stressed apparel, f ex jeans
- Apparel with batteries, electronics, etc.
- PFAS-treated apparel

NB This aligns very much with ‘recyclability’ scoring.

14.11.4 Do you want to add another comment?

- ○ Yes
- ◉ No

Finalization of **Part 2 of 2** the questionnaire

Your opinion matters to us.

Thank you very much for taking the time to contribute to

Part 2 of 2 of this consultation.

Contact

Contact Form