



Federation of the European  
Sporting Goods Industry

FESI Position Paper

# REVISION OF THE TEXTILE LABELLING REGULATION

June 2025

FESI welcomes the opportunity to contribute to the revision of the Textile Labelling Regulation. To ensure the rules are fit for purpose in today's modern, digital, and circular economy, the revised framework should aim to:

1. Ensure legal coherence between the TLR and other EU frameworks
2. Enable flexible communication of recycled content
3. Limit the TLR's scope to essential and relevant labelling domains
4. Acknowledge digital labelling as a full alternative to physical labels
5. Avoid rigid standardisation of label format and layout
6. Streamline language rules and keep symbols voluntary
7. Streamline the registration, classification and testing of new fibres
8. Adjust tolerance levels to reflect recycle fibres realities
9. Modernise product exclusion rules

The Federation of the European Sporting Goods Industry (FESI) is strongly supportive of the ongoing work conducted by the European Commission regarding the much-anticipated overhaul of the **EU Textile Labelling Regulation (TLR)**.

A substantial number of sporting goods products falls within the scope of the TLR, rendering it **one of the most critical legislative components for our sector regarding required product information through labelling**. As this Regulation was enacted over a decade ago, the time has arrived for a comprehensive revision that acknowledges the dynamic shifts within the textile industry. Recognizing the persistent shortcomings that have been identified, it is imperative that these issues be thoroughly and appropriately addressed during the revision process.

This revision should also be guided by the Commission's broader mandate and priorities. In recent communications, the Commission has repeatedly emphasized the need to **simplify EU legislation and improve its implementation** as key enablers for making it easier and faster to do business in Europe. In this context, FESI strongly welcomes the Commission's commitment to harmonisation, simplification and digitisation of labelling in the new Internal Market Strategy, specifically noting that "Future legislative initiatives, both new and revisions of existing EU legislation, will strive to provide simpler rules".<sup>1</sup> FESI hopes this commitment to simplification, digitalisation and efficiency will be reflected in the forthcoming TLR revision.

In our view, the most appropriate way forward lies in a **targeted and proportionate revision**, focused on **addressing concrete problems while avoiding unnecessary complexity**. While we see particular value in the measures falling under the "limited revision" approach, we also believe that a **flexible**,

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<sup>1</sup> [https://single-market-economy.ec.europa.eu/publications/single-market-our-european-home-market-uncertain-world\\_en](https://single-market-economy.ec.europa.eu/publications/single-market-our-european-home-market-uncertain-world_en)

**measure-by-measure selection** will produce the most balanced and effective outcome. Individual measures should be assessed on their merits, practicality, and contribution to a **clearer and more future-proof regulatory framework**.

This paper updates FESI's 2024 position and provides feedback on the measures under consideration, highlighting those we support and those that raise concerns for our industry.

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## 1. Ensure legal coherence between the TLR and other EU frameworks

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FESI fully supports the EU's ambition to improve sustainability and circularity in textiles and has actively contributed to the development of the Ecodesign for Sustainable Products Regulation (ESPR) and its upcoming Delegated Acts (DAs). However, we are concerned by proposals to tightly link the TLR with the ESPR framework in ways that risk undermining legal clarity and creating regulatory duplication.

The ESPR DAs are specifically designed to define both **product and information requirements** for a wide range of sectors, and textiles have been listed in the ESPR legal text for review of prioritisation in the EU Commission's first working plan. Therefore, the TLR should remain focused on its core function: providing harmonised rules for how product labelling information is communicated to consumers - **not introducing additional content obligations**. The proposed alignment between the two legislatives instruments raises three key issues:

- **Measure 3.2** applies new digital labelling obligations (such as care instructions and allergenic substances) only to textile products falling under the scope of a future ESPR Delegated Act. However, many of these requirements **are not sustainability-related** and have no direct connection to ESPR objectives. This raises a fundamental question: **why should general labelling obligations be applied only to a subset of products based on their inclusion in an ESPR DA?** Products outside the ESPR scope should not be exempt from basic consumer information obligations solely due to regulatory coverage unrelated to those specific domains.
- **Measure 3.3**, by contrast, would extend labelling obligations (including **ESPR-related sustainability and circularity requirements**) to all products within the scope of the TLR, even if those products are **not covered by any ESPR Delegated Act**. This creates a reverse inconsistency: products not subject to any ESPR content requirements would still be obliged to carry ESPR-type information on their labels, whereas products that **are covered by an ESPR DA** would have this information regulated through that DA. This would not only blur legal responsibilities but also risk requiring companies to communicate information that lacks a clear regulatory basis.
- The ESPR framework is **not exclusive to textiles** and will generate multiple DAs covering various product groups, such as electronics, paints, detergents, tyres and furniture. In those sectors, the ESPR DAs will stand alone. **There is no equivalent proposal to amend other product-specific labelling frameworks** in parallel. It is therefore unclear why the textile sector should be subject to **duplicate or supplementary requirements via the TLR**.

FESI strongly urges the Commission to maintain a clear and consistent division between legislative instruments available to it. The ESPR should govern sustainability-related content, while the TLR should provide a harmonised and technology-neutral framework for presenting consumer **information - when relevant, and only when legally grounded in primary legislation.**

As a forward-looking and balanced solution, FESI proposes the following alternative approach:

- ESPR-related requirements should not be incorporated into the TLR.
- Only essential information (typically related to product safety) should be mandated for display on a physical label.
- Where relevant labelling domains are not regulated elsewhere at EU level, the TLR may set harmonised rules for communicating that information. However, manufacturers should retain the flexibility to choose whether to display this information physically or digitally.
- If a product is subject to a Digital Product Passport (DPP) under a future ESPR Delegated Act, any information currently covered by the TLR and provided in digital form should be integrated into that DPP.
- For products covered by the TLR but not (yet) subject to a DPP, manufacturers should be free to select their own digital solution for providing label information.

This approach ensures clarity, supports innovation, respects the scope of each legislative instrument, and aligns with the Commission's broader objectives under the Digital Single Market and the Internal Market Strategy.

## 2. Enable flexible communication of recycled content

The sporting goods industry is increasingly incorporating recycled and other environmentally preferred materials into their products as part of a broader commitment to sustainability and responsible consumption. Consumers, too, are showing a growing interest in understanding the environmental profile of the products they purchase (particularly the presence of recycled content).

However, under the current TLR, there is no straightforward mechanism for companies to indicate the use of recycled fibres within the fibre composition itself. Manufacturers must instead list the fibre (e.g., cotton, polyester) and separately indicate whether it is recycled - typically phrased as "cotton – recycled fibres."

FESI believes that the revised TLR should offer companies **greater and reasonable flexibility** in how they communicate recycled content (including its percentage by weight) - whether that is via fibre composition labelling, packaging claims, or digital formats.

- Companies that wish to do so should be allowed to **indicate recycled content within the fibre composition**, such as by preceding the fibre denomination with the term "recycled" (e.g., "recycled polyester"). This would require the TLR to explicitly accommodate such language in Annex I and ensure consistency with other labelling rules.
- At the same time, manufacturers should not be required to present recycled content in this manner. For many, it may be more appropriate to communicate recycled content through

**product claims on packaging**, marketing materials, or digital channels. This **voluntary approach** allows for clear and harmonised communication if presented via fibre denomination without creating disproportionate compliance burdens.

Importantly, recycled content labelling now sits at the **crossroads of multiple regulatory frameworks**, each with a distinct focus:

- The **TLR** governs the structure and terminology of fibre composition labelling. It lays down rules concerning the use of textile fibre names and related labelling and marking of fibre composition of textile products, rules concerning the labelling or marking of textile products containing non-textile parts of animal origin and rules concerning the determination of the fibre composition of textile products by quantitative analysis of binary and ternary textile fibre mixtures, with a view to improving the functioning of the internal market and to providing accurate information to consumers (Article 1 TLR).
- **ESPR** may, *via* DAs, establish **minimum recycled content requirements** for certain textile products.
- The **Green Claims Directive** will regulate how voluntary environmental claim can be substantiated and communicated, that are not regulated by any other Union act.

Given these dynamics, the revised TLR must ensure **regulatory coherence** and clearly define:

- When and how recycled content can be referenced within the fibre composition in the framework of required product information regarding textile products;
- That such references are **voluntary**, not mandatory;
- How this aligns with information already disclosed under **ESPR** or the **DPP**;
- That any claim on recycled content falls within the **ESPR** and **TLR** rules as *lex specialis* and not under the **Green Claims Directive** which is a *lex generalis*. .

In summary, FESI calls for a **flexible and harmonised approach** that allows companies to communicate the use of recycled fibres in a way that is **clear, consumer-friendly, and compatible with overlapping EU legislation**. The revised TLR should enable this flexibility, where the **ESPR** DA has not yet outlined more specific rules, while avoiding regulatory duplication or contradiction. Doing so will support innovation, consumer transparency, and the EU's broader circular economy objectives.

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### 3. Limit the TLR's scope to essential and relevant labelling domains

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FESI acknowledges the European Commission's consideration of expanding the TLR beyond its current focus on fibre composition to include additional labelling domains. While improving consumer transparency is a shared objective, any extension of the TLR's scope must remain **proportionate, coherent, and aligned** with existing EU and international legislation. FESI offers the following views on each proposed domain:

### a. Product size labelling (EN ISO 8559)

While the Commission is considering keeping size labelling voluntary, if size is indicated, manufacturers would be required to follow the EN ISO 8559 standard and include it in the physical label. FESI believes this approach is unnecessarily restrictive, will increase label sizing, and is not a proportionate measure related to the intended objective.

Brands should retain the freedom to use their **established sizing systems**, which are tailored to different consumer preferences and markets. The EN ISO 8559 standard may be useful as a **voluntary reference**, particularly for digital size charts in an e-commerce environment, but it should not be mandatory to be included on the physical label as consumers can see the dimensions of the garment in a physical store environment and would not need this information in addition on a physical label.

FESI would also like to note that the related pictogram for the size will take significant space. Where companies opt to include body measurements, they should be free to do so via digital labels, maintaining full **technology neutrality and compatibility** with the DPP.

### b. Origin labelling (“Made in”)

FESI is not opposed to the inclusion of origin information in principle. However, any mandatory requirement must be based on a **clear, consistent, and internationally aligned methodology and be able to be presented digitally only**. It must account for complex global value chains and multi-sourcing practices. Additionally, the term **“made in” should be sufficient as a label**, without requiring translation.

### c. Care instructions

FESI believes that care labelling requirements should be addressed under the **ESPR** and implemented through the **DPP**, which are better suited to handle environmental and durability information and to achieve the goal of extending the lifecycle of a product. Digitising this information will also allow extending the care labelling provided to consumers without the risk of incentivising further consumer label removals. Introducing separate care requirements in the TLR risks **duplicating obligations** and creating inconsistencies across legal instruments.

### d. Allergenic substances

Labelling of allergenic substances (e.g., skin sensitisers) should remain within the scope of the **REACH Regulation**, which is specifically designed to handle chemical risk and safety information. Including such information under the TLR, which is not tailored for scientific or toxicological disclosures, could undermine both clarity and compliance.

### e. Product safety

Safety-related information is already addressed under the **General Product Safety Regulation (GPSR)**. Duplicating these obligations within the TLR would be redundant and may create inconsistencies across sectors. Product safety should continue to be regulated via horizontal, cross-sectoral frameworks.

#### f. Social and ethical labelling

FESI fully supports responsible supply chains and labour rights. However, social impact and ethical sourcing are **corporate responsibilities**, not product characteristics. These matters are appropriately regulated through instruments such as the **Corporate Sustainability Due Diligence Directive (CSDDD)** and the **EU Regulation on Forced Labour**. Including social information on product labels risks oversimplifying complex issues and is not suited to the scope of the TLR.

##### a. Leather labelling

FESI does not support extending the TLR to cover leather and other non-textile materials. Leather is not a textile fibre and falls outside the intended scope of the Regulation. Including it would blur legal clarity, create enforcement complexity, and increase compliance burdens without clear benefits. Any labelling rules for leather should be addressed separately through a dedicated and appropriate regulatory framework.

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#### 4. Acknowledge digital labelling as a full alternative to physical labels

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FESI strongly supports the inclusion of **digital labelling as a fully viable alternative to physical labels** within the revised TLR. The transition to e-labelling is not only essential for reducing environmental impact but also for addressing the operational and compliance burdens posed by fragmented and outdated labelling requirements across EU legislation. In this context, we strongly welcome the Commission's recognition of these positive contributions that digital labelling will bring in its new Internal Market Strategy. It is important to note that the positive effects digital labelling can have on competitiveness, will only materialize if this is replacing and not duplicating or adding to physical labels. The building of digital infrastructure related costs will come on top of current costs for physical labels if both domains continue to exist next to each other. FESI would like to highlight that especially for SMEs the costs for establishing DPP digital labelling systems should not be underestimated.

We welcome the Commission's recognition of digital labelling in the current policy discussion, particularly within **Measures 3.2**, and in the recent **Communication on the Long-term Competitiveness of the EU**. The Communication clearly acknowledges that in the longer term, "**digital labelling relying on a data carrier such as a QR code is the solution for simplifying access to labels for consumers and for easing compliance for economic operators**," while physical labels should be reserved for "essential information such as safety instructions". FESI agrees with this delineation of what is essential, namely consumer health and safety information.

**Fibre composition, care instructions, and other non-critical safety consumer information should be eligible for digital presentation**, provided accessibility is ensured. Approximately **70% of consumers remove labels post-purchase**, diminishing their usefulness and undermining EU goals related to product care, reuse, and circularity. This highlights that when it comes to labelling size and the provision of information, consumers prefer no information and no label, over a label with lengthy information. Based on consumer behaviour, the TLR should therefore aim at shortening the label as

much as possible via digital labelling to secure that more than 30% of consumers are benefitting from TLR information.

Digital labelling offers clear advantages:

- It reduces waste, label size, and carbon emissions.
- It enables **multi-language access** through a single, scalable data carrier, improving accessibility.
- It supports **real-time updates and essential corrections**, better traceability, and enhanced consumer engagement.
- It facilitates **intellectual property protection** through secure, verifiable formats.
- It can reduce the complexity of information provided to consumers (a challenge recognized in the Commission's Internal Market Startegy) and the likelihood of consumer removing all labelling information

However, to fully realise these benefits, digital labelling provisions must be **technology-neutral**, allowing manufacturers to adopt the most appropriate digital tools. At the same time, e-labelling must be **fully interoperable with the DPP**. A fragmented approach, with multiple digital entry points for different pieces of legislation, would be counterproductive. The DPP should serve as a **centralised and harmonised platform** for all product-related information (technical files, sustainability attributes, and mandatory consumer-info).

Should the Commission decide to mandate any physical labelling requirements via the TLR, FESI would like to strongly call for **automatically sunsetting** this requirement. The finalisation of the review of the TLR and its update to changes in consumer behaviour will be concluded only over 15 years after the last review. With respect to digitalisation and the Commission's commitments made in the Internal Market Strategy, **any mandatory physical labelling requirement should be automatically phased out after 4 years**, unless the Commission proactively extends this requirement for another 4 years based on consumer behaviour data. This ensures the TLR will stay relevant and in support of innovation and changing consumer behaviours outside of lengthy regulatory reviews.

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## 5. Avoid rigid standardisation of label format and layout

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FESI recognises the Commission's intention to enhance label readability and accessibility through possible standardisation measures such as harmonised font sizes, wash cycle durability requirements, and uniform label layouts. While clarity is a legitimate objective, these measures must be carefully calibrated.

Excessive standardisation could risk **undermining brand identity and communication strategies** that are essential for consumer engagement, product differentiation, and brand loyalty. Many sporting goods companies have developed distinctive visual and textual approaches to presenting product information under formats that are recognised and trusted by their consumers.

FESI therefore cautions against a rigid, one-size-fits-all approach to label design. While improved legibility is a shared goal, it must be achieved in a way that **respects brand individuality**, allows for **creative flexibility**, and acknowledges the diverse needs of both companies and consumers. The TLR should strike a balance between **readability and regulatory proportionality**, ensuring that any standardisation remains targeted, non-intrusive, and fully compatible with modern branding practices.

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## 6. Streamline language rules and keep symbols voluntary

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Under Article 16.3 of the current TLR, labels must be provided in the official language(s) of the Member State where the product is placed on the market. In practice, this provision is becoming increasingly complex.

Recently, regional consumer authorities in some Member States have begun requesting the use of regional languages on physical labels. This trend could significantly increase the number of required translations beyond the EU's 24 official languages. This would not only increase the size of physical labels (impacting both readability and sustainability) but could also lead to inconsistencies across the Single Market. Larger labels may further motivate consumers to remove them shortly after purchase, reducing long-term access to the information they were designed to provide, including second-hand products or products that are repaired, reconditioned or recycled, that re-enter the supply chain in the course of a commercial activity.

FESI therefore supports the introduction of **maximum harmonisation** in this area, ensuring a consistent application of language requirements across all Member States and avoiding the risk of fragmentation at national or even regional level.

In this context, we strongly support **Measure 3.5**, which proposes to **harmonise the voluntary use of language-independent symbols or codes** on physical labels across all TLR labelling domains, complemented by digital explanations in all EU languages. This measure could:

- Improve label readability.
- Reduce the need for and/or reliance on translations.
- Provide a consistent, EU-wide reference system for consumers.

However, FESI underlines that the use of such symbols must remain **voluntary**. Their effectiveness will depend on **clarity, ease of interpretation**, and the **option for companies to adopt them where appropriate**. Importantly, the introduction of a symbol system should not hinder the development and labelling of new or innovative fibres.

In contrast, FESI does **not support Measure 3.6**, which would make the use of language-independent symbols **mandatory** on all physical labels. While we recognise the potential benefits of visual standardisation, a mandatory system would reduce flexibility and limit how companies engage with consumers. A more prescriptive approach could also complicate labelling for products where standardised symbols are not yet appropriate or recognised.

In conclusion, FESI supports efforts to improve clarity and accessibility in labelling but urges the Commission to maintain flexibility and proportionality. A combination of **maximum harmonisation for languages** and **voluntary use of standardised symbols** represents the most balanced and effective way forward.

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## 7. Streamline the registration, classification and testing of new fibers

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The current process for introducing new fibre names into Annex I of the TLR is widely regarded as **slow, and complex**. Companies often struggle with unclear procedural steps, high testing costs, and limited access to qualified laboratories. As a result, innovative and sustainable fibres are either delayed in reaching the market or labelled under vague terms like “other fibres,” limiting transparency for consumers and stifling industry progress.

There is a need to improve alignment between the TLR and international standards for both fibre names and fibre testing methods. Several fibre names listed in Annex I do not correspond to those defined under ISO 6938:2012 or ISO 2076:2021, which creates inconsistencies in labelling across international markets. FESI supports **Measure 1.1**, which would allow new fibre names to be added via a delegated act in line with **EN ISO standards**. This would improve legal clarity, reduce administrative burden, and align EU rules with global classification systems. However, we **oppose Measure 1.3**, which would group fibres into broad generic categories. While simplification is a valid goal, this approach risks limiting transparency, consumer understanding, and market differentiation—especially for sustainable fibres.

FESI also supports **Measures 2.9 and 2.10**, which aim to clarify and simplify the **application and testing process** for new fibres. The analytical methods listed in Annex VIII of the TLR often differ from those permitted under ISO and EN standards, especially for binary and ternary fibre mixtures. In practice, this leads to confusion during laboratory testing, delays in product verification, and uncertainty about which methods are deemed acceptable. ISO standards allow for widely used techniques (such as microscopic analysis) that are currently not reflected in the TLR. Publishing clearer procedural guidance and aligning technical requirements with ISO and CEN standards would reduce barriers to innovation and help ensure timely recognition of new materials.

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## 8. Adjust tolerance levels to reflect recycle fibers realities

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As the EU champions a more circular and sustainable textile economy, it must ensure that its regulations reflect the technical realities of recycled fibre use. The current **3% manufacturing tolerance** in Article 20(3) of the TLR is no longer fit for purpose - particularly as more manufacturers incorporate recycled fibres, which naturally vary in composition due to input inconsistencies.

FESI advocates for increasing this tolerance from 3% to 5%, in line with practices in other global markets such as Japan, Australia, and South Korea. This adjustment would:

- **Support broader use of recycled materials** by acknowledging the unavoidable variability in recycled fibre composition.
- **Reduce regulatory risk and non-compliance penalties**, particularly for SMEs and innovators in sustainable textiles.
- **Lower testing costs and simplify compliance**, making it easier for companies to meet labelling requirements accurately and efficiently.

While we appreciate the Commission's recognition of this challenge in **Measure 1.5**, the proposed extension of the 5% tolerance in **Article 20(2)(b)** misses the mark. That provision addresses *extraneous fibres* from processes like carding - not the core issue of **manufacturing variability**, which is governed by **Article 20(3)**. Amending Article 20(3) directly would provide the clarity and flexibility manufacturers actually need.

We also acknowledge the potential usefulness of **Measure 1.4**, which suggests issuing guidance on how current tolerance rules apply to recycled and innovative fibres. However, guidance can only be effective if the **underlying rules are realistic and technically appropriate**. Without adjusting the base tolerance in Article 20(3), such guidance may have limited impact. While guidance may have an interpretative character, it does not have the same legal force as regulations, directives, or decisions, and the authoritative interpretation of EU law remains the responsibility of the Court of Justice of the European Union (CJEU).

Modernizing tolerance rules is not just a technical detail. It is a critical enabler of the EU's green transition in textiles. The revised TLR must reflect this by focusing its efforts on the right regulatory levers.

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## 9. Modernise product exclusion rules

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The current Annex V, which lists the products excluded from labelling obligations, lacks the clarity needed by manufacturers to ensure compliance. Items such as travel goods made of textile materials, for example, remain ambiguously treated in both the regulation and its supporting FAQs. This regulatory grey area creates unnecessary confusion, inconsistent enforcement across Member States, and operational uncertainty for companies (particularly when interacting with local market authorities).

FESI strongly supports **Measure 2.6**, which proposes a **conceptual regulatory approach** that combines a general definition of excluded product categories with a **non-exhaustive list of examples**.

We believe this approach strikes the right balance between **regulatory certainty and future-proofing**, in line with the Commission's broader goals of better regulation and simplification.

By contrast, FESI views **Measure 2.5** - which suggests updating Annex V via a delegated act while maintaining a **closed, exhaustive list** of exempted items - as significantly more limiting. While revising the current list could bring short-term clarity on specific cases (e.g., socks, gloves, or backpacks), it risks creating rigidity that will require constant updating as new products enter the market. This could result in administrative burdens and unnecessary delays, especially for innovative or borderline items.

In short, **Annex V should not be treated as a static catalogue**, but as a dynamic tool that evolves alongside the industry. Adopting a definition-based, non-exhaustive approach would help ensure that the TLR remains clear, relevant, and innovation-friendly over the long term.

#### Annex: FESI position on labelling domains

| Labelling Domain                                       | Included in TLR scope | preferred format                                  |
|--------------------------------------------------------|-----------------------|---------------------------------------------------|
| Fiber composition                                      | YES                   | Physical or Digital as chosen by the manufacturer |
| Care ISO 3758 standard                                 | NO (ESPR)             | Digital                                           |
| Size (EN ISO 8559)                                     | NO                    | Digital                                           |
| Size (industry practices)                              | YES                   | Physical                                          |
| Made-in (origin labelling)                             | YES                   | Physical or digital as chosen by the manufacturer |
| Sustainability parameters                              | NO (ESPR)             | Digital                                           |
| Allergenic substances                                  | NO (REACH)            | Digital                                           |
| Recycled fiber content (not min required % under ESPR) | YES                   | Physical or Digital as chosen by the manufacturer |
| Critical Product Safety information                    | NO (GPSR)             | Physical                                          |
| Social parameters                                      | NO (CSDDD, FLR)       | N/A                                               |

Founded in 1960 FESI - the Federation of the European Sporting Goods Industry represents the interests of approximately 1.800 sporting goods manufacturers (85% of the European market) through its National member Sporting Goods Industry Federations and its directly affiliated companies. 70-75% of FESI's membership is made up of Small and Medium Sized Enterprises. In total, the European Sporting Goods Industry employs over 700.000 EU citizens and has an annual turnover of some 81 billion euro.