

Brussels, June 2026

Mr. Stéphane Séjourné, Executive Vice President for Prosperity and Industrial Strategy

Ms. Jessika Roswall, Commissioner for Environment, Water Resilience and a  
Competitive Circular Economy

## **Textile Industry Call for an Ambitious and Implementable Approach to Recycled Content**

Dear Executive Vice President Séjourné,

Dear Commissioner Roswall,

The European Branded Clothing Association (EBCA), the Federation of the European Sporting Goods Industry (FESI), EuroCommerce, and the European Apparel and Textile Confederation (EURATEX) are committed to reducing the reliance of the global textile industry on virgin fibres, and therefore welcome the intention of the Ecodesign for Sustainable Products Regulation (ESPR) proposal, specifically to increase the uptake of recycled content in the sector.

We, the undersigned associations, would like to highlight the need to take an implementable, yet proportionate and ambitious approach to setting recycled content performance requirements under the ESPR's forthcoming Delegated Act for Textile Apparel.

We understand and support the goal for consumers to have access to product-level sustainability information through the Delegated Act, and we therefore support setting recycled content information requirements at product level. Setting the information requirement at product level maintains coherence with the other proposed design options, giving consumers a holistic view of the sustainability aspects of textile products.

To assess compliance with the recycled content performance requirement, we urge the European Commission to adopt an aggregated average methodology for recycled content at the operator level. This approach would be compatible with the commercial realities of the textile sector, allowing operators to be ambitious in allocating recycled content to products without compromising performance and quality, as well as minimising trade-offs between recycled content, product durability, and secondary material availability. We believe that this approach would be a logical starting point to chart a path towards greater recycled content ambition over time.

Such an approach would be calculated as an aggregated average across in-scope products placed on the market by the economic operator. The proportion of recycled fibres shall be calculated by dividing the total weight of recycled fibres in products placed on the market by the economic operator by the total weight of fibres in those products.

This calculation model is inspired by the Implementing Decision 2023/2683 regarding the SUP Directive, reinforced with the Commission's reasoning in section 93 of the FAQ on ESPR of September 2024.

We believe that the aggregated approach would also result in improved environmental outcomes compared to the JRC's proposed approach, achieving the intended effects of the legislation, as well as creating necessary incentives to expand recycling infrastructure. An aggregated average calculation approach would give operators the flexibility to meet more ambitious recycled content targets, allocating higher levels of recycled content based on evolving market conditions.

Additionally, the proposed approach would give producers the necessary degree of flexibility to select where to incorporate recycled content without compromising product quality and durability. Comfort, robustness, affordability, intended use, and design choices all can make certain garments or fibres more or less appropriate for the integration of recycled content. An aggregated average would therefore allow producers to allocate recycled fibres to products that are best able to accommodate them.

While this approach provides flexibility in meeting proposed performance requirements, it would also facilitate robust verification through existing chain-of-custody systems. At company level, it would rely on aggregating product-level verifications under established reporting and assurance mechanisms, such as those under the Corporate Sustainability Reporting Directive (CSRD). This approach would ensure transparency and credibility while reducing unnecessary complexity.

The signatories of this statement call on the European Commission to consider our recommendations for an outcome which we believe both improves the ambition of the ESPR while allowing for a simplified and proportional approach to compliance and enforcement. We welcome the opportunity to engage in a direct dialogue based on these principles.

We look forward to your response.

Sincerely,

Isabelle Maurizi, Director General, European Branded Clothing Association

Jérôme Pero, Secretary General, Federation of the European Sporting Goods Industry

Dirk Vantighem, Director General, European Apparel and Textile Confederation

Christel Delberghe, Director General, EuroCommerce



Federation of the European Sporting Goods Industry

