



Federation of the European
Sporting Goods Industry

FESI Position Paper

ESPR Textile Delegated Act

October 2026

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Executive summary

FESI supports the objectives of the ESPR framework and the transition towards a more circular, durable and resource-efficient textile ecosystem. At the same time, ecodesign requirements for textiles must remain technically feasible, proportionate and compatible with the functional realities of textile products, particularly within the sporting goods sector because of the additional use context of those products – not only to cover the body but also protect, ensure and enhance performance.

Sportswear and technical apparel differ fundamentally from lifestyle apparel in terms of intended use, material composition and coating, construction, performance requirements and consumer expectations. Product design choices relating to compression, moisture management, elasticity, weather protection, thermal regulation and performance are directly linked to the intended use of the garment during sports and physical activity. These technical characteristics also influence user behaviour, including wear intensity, laundering frequency and purchasing decisions. For this reason, FESI considers that technical sportswear and technical textiles should not systematically be assessed through the same ecodesign criteria, scoring methodologies or environmental benchmarks as general lifestyle apparel. Design options and requirements must be tailored to the specific nature of each product, rather than determined solely by the construction of the final product. For instance, a pair of socks and a t-shirt cannot be assessed under identical durability frameworks, as their end-of-life drivers differ significantly.

More broadly, and based on current proposals, FESI supports a phased and balanced approach under the first Textile Delegated Act combining:

- **performance requirements on recycled content;**
- **information requirements on robustness and recycled content;**
- **voluntary information disclosure on environmental footprint and repair service availability.**

FESI further stresses that all future requirements should remain conditional upon robust feasibility assessment, methodological refinement, technically feasible implementation rules, flexibility across product categories, and sufficiently long transition periods. Requirements should not be introduced before their operational, financial and supply-chain implications have been fully assessed, particularly for technical sportswear, licensed merchandise, customised products and complex multi-material garments.

Robustness: FESI supports robustness as a pragmatic starting point for durability assessment, provided that the framework focuses on identifying common product failure modes rather than attempting to predict absolute product lifespan. As a first step, robustness should be introduced as an information requirement only, allowing market data collection to support any future performance thresholds. At the same time, the current methodology requires substantial refinement regarding

testing procedures, scoring methodologies and product differentiation, particularly for technical and performance apparel.

Repairability: mandatory repairability requirements remain of limited impact for textiles due to the absence of harmonised methodologies and the fundamental differences between textile products and sectors such as electronics. Apparel items are generally inherently repairable, and their repairability does not rely on specific spare parts or tools unique to an economic operators' product. Any potential design requirements to increase textile repairability must also account for the importance of seam integrity, material construction and technical performance in sportswear and outdoor apparel, leading to potential trade-offs with other requirements such as robustness.

Recyclability: FESI supports the objective of improving textile recyclability but considers the current recyclability scoring framework inadequate for consumer-facing implementation. Recyclability requirements should not undermine durability, product functionality or technical performance, particularly for products relying on multilayer constructions, coatings or specialised material combinations. In addition, any scoring framework should not disincentivise accelerating innovations in the textile sector or penalise economic operators based on the current availability or maturity of collection, sorting and recycling infrastructure, as these systemic conditions remain largely outside producers' direct control. At this stage, FESI does not support binding recyclability performance requirements or classes of performance, given methodological and infrastructure immaturity.

Recycled content: FESI considers recycled content requirements a relevant and impactful design option, bearing in mind certain limitations still persist – particularly regarding the cost and accuracy of current testing methods, as well as the maturity of recycling systems. Well-designed recycled content obligations can support demand for recycled fibres, stimulate investment in recycling infrastructure and accelerate the transition towards a circular textile economy. FESI supports setting recycled content information requirements at product level and assessing compliance with any performance requirement through an aggregated-average methodology at economic operator level, inspired by the approach under Implementing Decision 2023/2683 on the Single-Use Plastics Directive. Verification would rely on existing chain-of-custody systems and established reporting and assurance mechanisms, such as those under the Corporate Sustainability Reporting Directive. At the same time, targets must remain technically credible, material-specific and sufficiently flexible to reflect current recycling and testing limitations as well as the diversity of textile applications: applying a uniform threshold to fundamentally different product categories would undermine both environmental effectiveness and regulatory credibility. Operator-level aggregation should apply only for regulatory compliance and not for consumer-facing product claims, which should remain accurate for the specific product.

Additionally, while recycled content is a crucial component of circularity, the ESPR framework must also consider other approaches, such as Sustainably Sourced Raw Materials, that can yield substantially lower environmental footprints, especially for natural fibres.

Environmental footprint: FESI recognises the value of LCA and PEF methodologies as evidence-building and analytical tools. However, environmental footprint methodologies remain highly dependent on methodological assumptions, present challenges in consumer communication, and should therefore not form the basis for mandatory comparative labels, market-access criteria or

performance obligations under the first Textile Delegated Act. FESI additionally opposes the introduction of standalone carbon footprint requirements, which would provide an excessively narrow representation of textile sustainability performance.

Substances of concern (SoCs): FESI supports a pragmatic and legally coherent approach to substances of concern under ESPR. Existing chemicals legislation, notably REACH and POPs frameworks, should remain the primary framework governing chemical risk management in textile products. ESPR obligations should avoid duplicating existing legislation, creating disproportionate traceability obligations or discouraging the uptake of recycled materials due to legacy substances in global supply chains.

1. Robustness

FESI welcomes the approach taken by the Joint Research Centre (JRC) in the third milestone of the preparatory study¹ to introduce a simplified durability framework based on the concept of **robustness**. We support, in principle, the use of parameters already commonly tested within the textile and apparel sector, as this represents a pragmatic starting point for the first Textile Delegated Act; however, robustness must be clearly framed as a measure of performance under defined testing conditions, not as a prediction of absolute product lifetime. The actual lifespan of apparel depends on many external factors, including consumer behaviour, care practices, frequency and intensity of use, climate conditions, accidental damage and manufacturing variability. Standardised laboratory testing cannot fully capture these factors, and consumers must be able to understand precisely that such a score **should not be interpreted** as a general statement that one product will last longer than another in all circumstances, regardless of care.

For this reason, FESI considers that the robustness framework should focus on identifying common product failure modes and preventing the worst-performing products from entering the EU market, rather than attempting to simulate ageing or quantify service lifespan. The framework must also be sufficiently granular to reflect the diversity of apparel products, including technical sportswear and performance apparel, while remaining feasible and proportionate for companies to implement.

Recommendations:

1. Refine product categorisation

FESI considers that the proposed robustness framework must better reflect the diversity of apparel textiles. The current categorisation of products into merely knit, denim and other woven

¹ EC Joint Research Centre, Preparatory study on textiles for product policy instruments, 3rd milestone, to be found [here](#).

products is too broad to capture the distinct durability profiles of different product types and raises questions regarding how products such as apparel accessories will be addressed. Technical sportswear, outdoor apparel, basic T-shirts, evening wear and delicate fashion garments may differ significantly in function, construction, material composition and use intensity. Applying a simplified categorisation across these products risks producing results that are insufficiently meaningful and may lead to discriminatory or misleading outcomes. For example, within the broad “knit” category, products such as socks, basic T-shirts and technical fleeces differ significantly in weight, structure, intended use and performance requirements. A single benchmark across such products could mechanically favour lighter and less complex products, rather than rewarding best-in-class durability and eco-design within each functional product category. This is especially relevant for sporting goods and performance apparel, where intended use plays a central role in product design.

2. Clarify the applicable ISO standards

Further clarification is needed on the standards and testing procedures applied to existing parameters. FESI recommends that the methodology explicitly refer to:

- For dimensional change, the reference to ISO 3759 is incomplete if used in isolation: the methodology should clearly refer to ISO 3759 as the measurement protocol, ISO 6330 as the washing protocol, and ISO 5077 for determining dimensional change after washing and drying.
- The spirality test procedure should be explicitly defined: FESI recommends specifying ISO 16322-3, Procedure B.

The absence of a clearly defined procedure would risk inconsistent results across laboratories and reduce the ability to establish harmonised EU-wide benchmarks.

3. Remove visual inspection from scoring parameters

FESI also raises concerns regarding visual inspection as currently proposed and does not consider the proposed sub-parameter of smoothness to be an appropriate criterion. Including smoothness as a sub-parameter would risk penalising natural-fibre products based on inherent material characteristics: fabrics such as cotton, linen or viscose naturally crease after washing, and these changes do not indicate reduced functionality or end-of-life performance.

More broadly, not all visual changes should be treated equally, as certain aesthetic, colour or material choices may be directly linked to the intended function or safety performance of the product. For example, swimwear fabrics often contain nylon and/or elastane and may use fluorescent dyestuffs to create bright colours in water, including for visibility and safety purposes. The current approach therefore lacks proportionality and risks reducing the technical relevance of the robustness score by treating aesthetic changes as equivalent to functional deterioration. FESI therefore calls for the removal of smoothness as a sub-parameter, as well as the visual inspection category as a whole.

4. Include material strength as an additional parameter

The current parameter selection focuses mainly on cleaning-related failure modes, which does not sufficiently capture failures linked to tearing or material weakness during use. FESI recommends adding material strength to the robustness framework:

- for woven products, through ISO 13934-1 and ISO 13934-2;
- for knitted products, through ISO 13938-2.

The inclusion of strength would improve the relevance of the framework and help consumers better understand whether a product is made from a delicate material requiring particular care or from a stronger material suitable for more intensive use. Without a strength parameter, a lightweight satin dress intended to be dry clean only, or very lightweight cotton swim cover up intended for beach lounging only, could score a high robustness score of 10 if only assessed on the physical stresses encountered during the care cycle. This could be the same score as a pair of hiking trousers made from a very strong polyester woven intended to withstand the stresses of abrasion from rocks.

5. Recalibrate thresholds and allow reasonable tolerance

FESI recommends widening the thresholds for spirality and dimensional change, and allowing reasonable production tolerances, including:

- $\pm 0.5\%$ for dimensional stability and spirality;
- 0.5 grade for ISO 15487 assessments.

The proposed thresholds appear too narrow and may fall within normal measurement uncertainty, meaning products with no meaningful difference in performance could receive different scores. The scoring system should reflect real product performance, not statistical variability or normal production variation between batches.

Table 71. Sporting goods industry input on the robustness score, without woven/knit separation

Parameter	ISO Standard	Fabric Type	Test Result	Points
Dimensional Stability	3759	All	change > $\pm 7\%$	0
			$\pm 2\% < \text{change} \leq \pm 7\%$	1
			change $\leq \pm 2\%$	2
Spirality	16322-3	All	spirality > 8%	0
			3% < spirality $\leq$ 8%	1
			spirality $\leq$ 3%	2
Wash Durability	15487	All	$\leq 2,5$	2
			4 < change $\leq$ 3	3
			≥ 4	4
Strength	13934-1,-2	Woven	< 70N	0

	13938-2	knits	70N ≤ 200N	1
			> 200N	2
			< 120kPa	0
			120kPa ≤ 250kPa	1
			> 250kPa	2

6. Specificities of the approach proposed in the table and additional input

As shown in the above table², on dimensional stability, the industry proposal a threshold of 2% for the allocation of 2 points (BNAT) - a higher standard in comparison with the JRC Proposal (3/5%). Such a change would be unnoticeable for consumers, and would be achievable by best-in-class textiles across both woven and knit product categories. The threshold for the allocation of 0 points, on the other hand, matches the JRC 0-point proposal for knit materials; this threshold also aligns with the PEFCR basic level for 22 product types.

Similarly, on spirality, the industry proposal puts the threshold for the allocation of 2 points (BNAT) at a higher standard compared to the JRC Proposal (5%). Again, this reflects in an unnoticeable change for consumers, and it is possible for best-in-class apparel garments across woven and knit product categories to achieve. The 0-point level, in the same logic, matches the JRC already had as a 0-point threshold for knit materials; this threshold also aligns with the PEFCR basic level for 12 product types.

As shown in the table, the industry calls against the introduction of separation between knitted and woven fabric type for dimensional stability and spirality, as most consumers are not aware if the material they are wearing is knitted or woven. They will only see the dimensional change/spirality effect. These levels of points are designed to consider what is acceptable and not for consumers considering all material types they encounter.

7. Ensure realistic and proportionate cleaning-cycle conditions

FESI supports five cleaning cycles as a general approach, provided that tests follow the care label and reflect realistic care conditions. Exceptions could be considered for products cleaned less frequently, such as outdoor coats and jackets, gowns and eveningwear. FESI also recommends allowing both ISO 6330 type A and type B washing machines, flat drying for a maximum of one hour between the first four washing cycles, and final drying according to the care label, with ironing optional where indicated. Furthermore, the testing procedures and protocols should follow product care label requirements.

² The table represents proposed modifications to table 71 from the 3rd milestone preparatory study document; additional clarity on the datapoints included, as well as industry positions on testing, scoring and standards, can be found in the dedicated [FESI paper on Industry proposal on Robustness score](#), submitted alongside FESI's contribution to the 3rd milestone consultation.

8. Allow internal and/or equivalent testing

From an implementation perspective, FESI calls for companies to retain the ability to conduct testing internally, without mandatory reliance on external laboratories. When the granularity is set at model level, such self-certification should be conducted in ISO 17025-accredited labs. Should a more granular approach to product data be established, FESI recommends adopting additional flexibility to minimize administrative burden and compliance costs for manufacturers. Many companies already operate established in-house testing and quality assurance programmes, which are designed to ensure product performance, consistency and compliance across global markets. Requiring mandatory external laboratory checks in all cases would create unnecessary costs, delays and administrative burden, without necessarily improving the reliability of test results.

A single test per product should generally be sufficient, or two tests where the lightest and darkest colourways are assessed. The different parameters should furthermore be assessed through cost-effective procedures based on internationally recognised ISO standards, or equivalent methods aligned with comparable technical requirements.

Where companies use nationally or internationally recognised methods that produce comparable results to the specified ISO standards, these should therefore be recognised as equivalent for compliance purposes³.

We particularly draw attention to the fact that many companies have set up robust quality processes based on standards from the American Society for Testing and Materials (ASTM standards), American Association of Textile Chemists and Colorists (AATCC standards), Japanese Industrial Standards Committee (JIS standards) and the Standardization Administration of China (GB standards). Where feasible, accepting comparable results according to one of these standards will avoid repeated testing and reduce the burden of compliance without sacrificing quality.

9. Introduce robustness first as an information requirement

FESI supports the introduction of robustness as an information requirement as a first step. Any information disclosure would need to be clearly framed, as consumers should be able to understand precisely what such a score communicates – that is to say, not a general statement that one product will last longer than another in all circumstances. Starting with an information requirement would allow the collection of market data, support future regulatory development and help establish appropriate baselines.

10. Develop future performance requirements only on the basis of robust data

In the longer term, FESI supports the development of performance requirements on robustness through a phased approach. Any future threshold should be based on representative market data collected over a sufficient period, ideally five years. This is necessary to ensure that benchmarks are technically justified, proportionate and reflective of actual market performance. Robustness

³ In this regard, FESI stresses that the framework should recognise equivalent national or internationally recognised standards where they produce comparable results. For example, some companies operate strength testing programmes based on ASTM methods rather than ISO 13934 or ISO 13938. Where documented equivalence can be demonstrated, mandating parallel ISO testing solely for EU compliance purposes would impose duplicative testing burdens without improving the reliability or comparability of results. Mandatory reliance exclusively on EU-prescribed or ISO-only standards would therefore be disproportionate to the regulatory objective and could create unnecessary technical barriers, particularly for non-EU brands already operating established compliance programmes.

may also play a role in future EPR eco-modulation, but only if the methodology is reliable, fair and capable of meaningful differentiation between products.

11. Avoid classes of performance

FESI does not support the introduction of classes of performance at this stage, as the technical and methodological basis is not yet sufficiently robust. The shortcomings of the current product categorisation would, at the root, not allow the creation adequate classes of performance; as a result, premature establishment of classes would only add complexity and compliance burdens without clear evidence of proportional benefits for consumers and with the risk of confusing them.

12. Provide a sufficient transition period

FESI calls for a minimum transition period of 48 months after the entry into force of the Delegated Act before robustness-related provisions become applicable. Textile supply chains are complex, and production cycles for high-quality sporting goods apparel often span at least 24 months. Additional time will be needed to implement testing procedures, update labelling systems, and develop Digital Product Passport infrastructure across global value chains.

2. Repairability

FESI recognises repairability as an important element of sustainable product design and its potential contribution to extending product lifespans and reducing textile waste.

At the same time, repairability for textiles differs fundamentally from other sectors, such as electronics, in various ways:

1. Unlike electronics and machinery, apparel products' repairability is not reliant on a specific design or provision of tools by an apparel company. Apparel products are generally technically repairable, with the main barrier constituting an individual person's taste and acceptability of the visual result of the repair rather than solely its basic functionality of covering the body.
2. Due to the diversity of textile materials, garment constructions, functional requirements and intended uses, particularly for technical sportswear and outdoor apparel, no harmonised methodologies or industry-wide standards currently exist to assess textile repairability in a reliable and comparable manner.

For these reasons, FESI considers the introduction of mandatory repairability performance requirements for textiles to be premature at this stage. Since apparel is already technically repairable in most cases, additional design prescriptions are unlikely to meaningfully increase repair rates or consumers' willingness to repair products; instead, they risk constraining product design or creating unintended trade-offs with durability, performance and functionality, particularly for technical sporting goods.

The sporting goods industry advocates for a framework that prioritizes the longevity of the physical material over the volatility of user preference. By separating the intrinsic physical capability of a garment to be repaired from the subjective behaviour of the consumer, a clearer framework for

repairability under the ESPR can be established. FESI therefore recommends removing "user acceptance" or "aesthetic satisfaction" from technical repairability in the formal definition of repairability.

Recommendations:

- FESI supports a voluntary and information-based approach focused on facilitating consumer awareness of repair services, rather than introducing mandatory repairability performance requirements.
- Any repair-related information should focus on the availability of repair services provided either directly by companies or through external partners. Such information should be provided digitally through the Digital Product Passport and remain generic rather than product-specific.
- FESI encourages the Commission to avoid placing responsibility on individual brands to maintain repair service directories for the entire lifetime of their products. As many repair providers are SMEs that may enter or exit the market over time, brand-specific lists would be resource-intensive to maintain and risk becoming rapidly outdated. Instead, FESI recommends the establishment of a centralised or sector-wide repair service directory, which would provide consumers with more accurate, up-to-date and easily accessible information while significantly reducing administrative burdens for economic operators.
- We oppose repairability requirements based on mandatory disassembly principles. Garment repair rarely requires full disassembly, while certain seam constructions, adhesives and assembly techniques remain necessary to preserve durability, elasticity, weather resistance and technical performance, ultimately extending the lifetime of a product and preventing the need for repair.
- The industry calls the policymakers to take into consideration not only technical feasibility of the repair but also costs of transport, components, and processes required, which may be economically and/or ecologically detrimental.
- FESI supports pragmatic measures that may facilitate repair without compromising product performance or innovation, such as providing standard fastener sizing information through the DPP. FESI additionally highlights the importance of strengthening repair infrastructure and supporting the development of repair-focused service providers across Europe.

Any future evolution towards more detailed repairability requirements should be developed gradually and in close cooperation with industry and standardisation bodies to ensure feasibility, proportionality, compatibility with the functional requirements of textile products, and potential impact on actual repair behaviour.

3. Recyclability

FESI supports the objective of improving textile recyclability and increasing the availability of secondary raw materials as part of the transition towards a more circular textile ecosystem. We recognise the role that design for recyclability can play in supporting future textile-to-textile recycling systems; however, the proposed recyclability framework requires substantial adjustments before it can be implemented effectively across the sector.

At the same time, we also welcome the JRC's recognition that textile recyclability depends not only on product design, but also on broader systemic factors such as collection systems, sorting infrastructure, recycling capacity and technological readiness; this recognition should be fully reflected in the scoring framework, as economic operators should not be penalised for infrastructure gaps or market conditions that remain largely outside their direct control (outside of EPR system participation). Meaningful progress in textile-to-textile recycling will require substantial long-term investments across the value chain, while current assumptions regarding rapid scaling of post-consumer textile recycling remain overly optimistic. Any recyclability scoring system introduced should be designed to evolve over time in light of technological advances and the maturation of recycling markets.

FESI stresses that recyclability should not be pursued in isolation from other ecodesign objectives. Measures aimed at improving recyclability must not compromise durability, functionality, safety, weather protection, comfort or product lifetime, particularly for technical sportswear and performance apparel where multilayer constructions, coatings and specialised material combinations are often necessary to achieve the intended product performance.

Recommendations:

- Recyclability requirements should focus primarily on product design characteristics directly under manufacturers' control, rather than external infrastructure limitations or the current maturity of recycling technologies. While FESI supports the objective of improving design for recyclability and increasing the availability and use of secondary raw materials, it does not support the introduction of a consumer-facing recyclability score in its current form. A simplified score cannot adequately reflect the significant influence of external factors (such as collection rates, sorting infrastructure and recycling capacities) which ultimately determine whether a product is recycled in practice. Instead, consumer communication should focus on clear disposal guidance and improving consumer literacy regarding textile sorting, while recyclability assessments should primarily support regulatory implementation and product design improvements rather than consumer-facing comparisons.
- FESI calls for greater flexibility regarding elastane thresholds and material composition requirements. The proposed elastane thresholds, particularly the 15% limit for polyamide products, may unintentionally penalise performance-oriented garments such as compression apparel, tights and technical sportswear as well as garments used in facilitating health and physical

recovery. More generally, thresholds should better reflect the realities of technical apparel construction and current recycling capabilities.

- Similarly, requirements favouring identical inner and outer compositions could disproportionately affect multilayer products such as jackets, coats and technical outerwear that rely on different materials for insulation, weather protection or comfort.
- Coatings are often essential to achieving the intended technical performance of sporting goods and outdoor apparel; FESI thus recommends avoiding restrictions on coatings that could undermine the functionality and safety of waterproof and weather-resistant products.
- FESI supports the use of digital technologies, including RFID tags and machine-readable information, to facilitate future sorting and recycling systems. At the same time, technological neutrality must be preserved in line with Article 12(6)(c) ESPR, allowing companies flexibility regarding the choice of digital identifiers most appropriate to their business models and supply chains.
- FESI considers that the level of ambition proposed for apparel recyclability should be carefully benchmarked against other product sectors with more mature recycling technologies and more established closed-loop systems. For example, the Packaging and Packaging Waste Regulation provides for recyclability assessment through design-for-recycling criteria and graded performance levels to be further developed through dedicated delegated acts, with phased timelines for application. Given that packaging recycling infrastructure and technologies are generally more mature than those for textiles, FESI questions the justification for applying a more ambitious or faster approach to apparel textiles than to sectors with higher technological readiness and more developed recycling markets.
- At this stage, FESI does not support the introduction of binding recyclability performance requirements or classes of performance. Current methodologies do not yet provide a sufficiently robust technical basis, while premature obligations would risk adding regulatory complexity, hampering innovation, without delivering proportionate environmental or consumer benefits. Priority should instead be given to collecting reliable market data and improving recyclability-related information requirements.
- FESI recognises that recyclability scores may eventually contribute to EPR eco-modulation systems; however, this would require substantial refinement of the current methodology to ensure that scores are fair, reliable and reflective of actual circularity outcomes.

4. Recycled content

FESI supports recycled content requirements as an important lever for reducing the environmental impacts associated with virgin fibre extraction and production and for accelerating the transition towards a circular textile economy. We therefore support the Joint Research Centre proposal of the Design Option 3 (DO3) on recycled content requirements under the 3rd milestone preparatory study as an appropriate starting point for the first Textile Delegated Act, provided that requirements remain technically feasible, scalable, material-specific and compatible with product durability, functionality and performance.

At the same time, FESI stresses that recycled content obligations must reflect the current realities of textile recycling systems and rely on clear, harmonised definitions. Eligible recycled content should include post-industrial, pre-consumer and post-consumer textile waste streams. FESI also supports the recognition of open-loop recycled content, including PET bottles, as part of the transition towards circularity. While textile-to-textile recycling should remain the long-term objective for the sector, many such technologies remain at an early stage of commercial deployment. In the short and medium term, significant volumes of recycled feedstock will continue to originate from post-industrial waste and non-textile sources, particularly PET bottles. Excluding such feedstocks prematurely would risk reducing the availability of lower-impact alternatives, creating supply pressures and incentivising the use of virgin materials.

Recommendations:

- FESI supports setting recycled content information requirements at product level, maintaining coherence with other proposed design options and giving consumers a holistic view of the sustainability aspects of textile products. To assess compliance with the recycled content performance requirement, FESI urges the European Commission to adopt an aggregated average methodology at economic operator level. The proportion of recycled fibres would be calculated by dividing the total weight of recycled fibres in textile products placed on the market by the economic operator by the total weight of fibres in those products⁴. The treatment of non-textile components (ie. trims, hardware, accessories) and fibres outside the scope of the Delegated Act should be expressly clarified by the Commission to ensure consistent and verifiable calculation across operators.
- This approach reflects the commercial and operational realities of the textile sector. In particular: (1) the amount of recycled content that can be integrated into a given product depends first on its performance and quality requirements; (2) some materials and fibres are not currently feasible

⁴ For clarity, the denominator should comprise the total weight of textile fibres in in-scope products placed on the market by the economic operator, with the system boundary aligned to the scope of the Textile Delegated Act. This calculation model is inspired by the approach used in other EU legislation; examples include the Construction Products Regulation framework, whose delegated acts reflect product-group level approaches to performance assessment, and Directive (EU) 2019/904 on single-use plastics, which sets recycled content targets for PET beverage bottles calculated as an average for bottles placed on the market in a Member State.

to source from recycled inputs due to availability, cost or quality constraints, and may require consideration of other lower-impact alternatives; and (3) setting recycled content targets at product or batch level would risk interfering with these realities and priorities, particularly for technical and performance products, certain accessories, components or non-textile elements. Thresholds set at product or construction-type level risk overlooking significant technical differences between products. For example, basic polyester fleece may incorporate very high shares of recycled polyester (up to 100%) without compromising performance, while certain high-performance knitted sportswear (especially those made from fine cotton yarns, with count > Ne40) cannot currently integrate comparable recycled content without affecting quality, durability or functionality. Uniform thresholds would therefore risk being either insufficiently ambitious for products where higher recycled content is feasible, or unrealistic for technically demanding applications. This is particularly important for products with additional design features, customisation or performance requirements, where recycled content may be more difficult to integrate without affecting quality, durability or functionality.

- An aggregated average calculation would therefore allow operators to pursue ambitious recycled-content uptake while allocating recycled fibres where they can be most effectively integrated, without compromising product durability, performance, quality or affordability, and without penalising products where recycled inputs are not technically or commercially viable.
- Verification of compliance at economic operator level would rely on aggregating product-level data under existing chain-of-custody systems and established reporting and assurance mechanisms, such as those under the Corporate Sustainability Reporting Directive. This approach would ensure transparency and credibility while reducing unnecessary complexity. FESI considers this a logical starting point to chart a path towards greater recycled content ambition over time.
- FESI stresses that an aggregated-average methodology for compliance should not be understood as permitting consumer-facing product claims that do not accurately reflect the recycled content attributable to the specific product; product-level claims should remain substantiated at product level, while operator-level aggregation should apply only for regulatory performance compliance.
- FESI further calls for clear alignment between ESPR recycled-content information requirements, the Textile Labelling Regulation and consumer-protection rules on environmental claims. Any product-level disclosure or claim relating to recycled content should remain accurate for the relevant product and should not create ambiguity between fibre-composition labelling, ESPR information disclosures and operator-level compliance calculations.
- Regardless of the compliance model ultimately retained, any binding recycled content targets should be based on sufficient evidence that the relevant recycled feedstock, certification systems and verification methods are available for the specific fibre and product category concerned. Targets should be phased in over time and remain flexible enough to reflect differences between materials, product construction and performance.

- FESI calls for full alignment of recycled content definitions⁵ across EU legislation and recommends using ISO 14021 as the harmonised reference point for recycled content, pre-consumer waste, post-consumer waste and post-industrial waste definitions. This is essential to ensure legal clarity, coherent accounting of recycled content and consistent application of requirements across different EU frameworks. Divergent or unclear definitions would create compliance uncertainty, increase administrative burden and risk undermining investment in recycling technologies and infrastructure at a time when textile-to-textile recycling is still emerging and not yet deployed at scale.
- Feedstock availability is also a fundamental part of the framework. The availability of high-quality recycled materials suitable for textile applications remains uneven across fibre types and supply chains. Textile-to-textile recycling is developing, but is not yet sufficiently scalable to support broad mandatory requirements across all product groups. As the textile industry has limited influence over the development of collection, sorting and recycling infrastructure, recycled content requirements should be aligned with the actual maturity of these systems. To address said potential market constraints, the framework should include a targeted review or adjustment mechanism, similar in nature to the safeguard foreseen under Article 7(13) of the Packaging and Packaging Waste Regulation⁶, allowing the Commission to adapt targets in exceptional cases where insufficient availability or excessive prices of recycled materials would make compliance disproportionately difficult.
- FESI strongly supports the continued recognition of open-loop recycled content, including recycled PET from non-textile sources, during the transition towards textile-to-textile recycling systems. Premature exclusion of such feedstocks would risk slowing down the replacement of virgin polyester before sufficient textile-to-textile recycling capacity becomes available. PET bottles not destined for conversion into food-contact packaging, where they would otherwise be downcycled, incinerated or landfilled, should remain eligible as recycled feedstock for textile applications where this prevents the use of virgin polyester and does not compete with closed-loop bottle recycling.
- FESI recommends setting recycled content T2T targets for materials such as polyester as a long-term northern star via a sub target of the overall recycled content targets. This will give a directional and long-term security to the supply chain. Moreover, the T2T targets should acknowledge the possibility to use material input from the broader textile sector. Closed-loop recycling should be understood as recycling within the broader textile ecosystem, rather than as a narrow apparel-to-apparel or product-to-same-product requirement. Overly restrictive definitions would risk constraining feedstock availability and fragmenting secondary raw material

⁵ Additional clarification is needed regarding terms such as “precursors,” “production errors” and “inaccurate resource planning” to avoid inconsistent interpretation and accounting practices.

⁶ Article 7, para 13 of PPWR: “Where the lack of availability or excessive prices of specific recycled plastics makes compliance with the minimum percentages [...] excessively difficult, the Commission shall be empowered to adopt a delegated act [...] to amend those paragraphs by adjusting the minimum percentages accordingly. In evaluating whether such adjustment is appropriate, the Commission shall assess requests from natural or legal persons to be accompanied by relevant information and data on the market situation for the post-consumer plastic waste and best available evidence regarding the related risks to human or animal health, to the security of food supply or to the environment”.

markets. For example, a framework requiring furniture fibres to be recycled only into new furniture, or apparel fibres only into new apparel, would create artificial barriers and place unnecessary constraints on the use of recycled materials. Until these challenges are addressed, the framework should recognise transitional sources of recycled content, including post-industrial waste, pre-consumer waste, post-consumer textile waste and, most importantly, open-loop recycled content.

- FESI also calls for geographical neutrality in the recognition of recycled content: materials should qualify based on compliance with applicable definitions, traceability and verification requirements, rather than on the geographic origin of the waste stream or recycle. Localisation requirements could restrict access to suitable secondary raw materials, disrupt established global circular supply chains, reduce economies of scale and increase compliance costs, particularly while high-quality textile-to-textile feedstock remains limited and unevenly available and demand for recycled materials is growing across multiple sectors. While FESI supports the development of the European recycling industry, this should be pursued through investment, innovation and stronger collection, sorting and recycling infrastructure, rather than through restrictions on sourcing. ESPR requirements and reference standards should therefore remain geographically neutral and interoperable with credible international standards, provided that recycled materials meet the relevant legal definitions and can be appropriately verified.
- Definitions and verification mechanisms should remain interoperable with credible internationally recognised standards to avoid creating unnecessary barriers to the import of recycled feedstocks.
- FESI supports the future use of EPR eco-modulation linked to recycled content quantity and source, provided that such systems recognise mass balance approaches and differentiate between different recycled feedstock streams.
- **Knitted products:** FESI considers the proposed targets for knitted products to require further adjustment, particularly regarding recycled wool. Recycled wool availability remains limited and heavily dependent on post-industrial waste streams, while post-consumer recycled wool continues to raise concerns related to traceability, animal welfare and legacy chemicals. Until these issues are addressed through appropriate traceability and certification systems, FESI considers mandatory recycled wool thresholds to be premature. More broadly, knitted products cover a wide range of constructions and performance requirements, meaning recycled fibres may affect elasticity, abrasion resistance, dye consistency and durability differently depending on the application. Requirements should therefore remain differentiated and flexible.
- **Denim products:** FESI recognises that denim products are generally more capable of integrating recycled cotton than many other apparel categories. However, recycled cotton content above approximately 20% (as per the JRC proposal in the 3rd milestone) may negatively affect fibre quality, tensile strength and overall product durability. Taking these factors into account, we support a target of 5% recycled cotton with a preference for traceable fibres and regenerative or organic cotton on a portfolio level. Moreover, any recycled content target for cotton should not only recognise the use of mechanically recycled cotton, but also the output materials of chemically recycled cotton materials.

- **Other woven products:** FESI considers the “other woven” category too broad and heterogeneous for a single set of recycled content thresholds. We therefore recommend operationally feasible thresholds combined with a staged progression roadmap allowing ambition to increase gradually as recycling technologies and feedstock availability mature. For recycled nylon, a 10% target would be a realistic starting point, as feedstock (particularly nylon 66) remains limited.
- **Blended fibers:** The industry calls for clarification and consideration of how the recycled content will be assessed for blended fabrics. Reporting at a company level for recycled content, with fibre composition disclosed at product level, would reduce the administrative burden while maintaining transparency, as well as allowing for higher ambition and recognition of technical constraints.
- **Costs and implementation:** FESI considers that the current JRC cost assumptions significantly underestimate the operational and administrative implications of recycled content requirements and goes counter to the objective mentioned in the Recital 75 and Article 5 (11) (c) of the ESPR legal text. Certification costs, audit preparation, staffing, traceability systems and DPP-related reporting obligations may generate substantial recurring costs across the supply chain. Integrating recycled fibres often requires significant research and development efforts, redesign of material blends and adaptation of manufacturing processes in order to preserve durability, technical performance and product quality.
- Finally, FESI calls for a minimum transition period of 48 months following the entry into force of the Delegated Act. This will be necessary to allow companies to adapt supply chains, establish traceability and certification systems, and ensure operationally feasible implementation across global textile value chains. However, this transition period should not be understood as implying that full textile-to-textile, closed-loop recycling will be technically or commercially available at scale by its end: open-loop recycled content will remain necessary beyond the initial 48-month period, while the development of closed-loop textile-to-textile recycling will require a significantly longer implementation horizon, indicatively around 10 years.

5. Sustainably Sourced Raw Materials (SSRMs)

FESI supports work to review an inclusion of Sustainably Sourced Renewable Materials within the scope of ESPR, e.g. as voluntary information at model level within the DPP. Uptake of SSRM and the associated benefits could then be encouraged by linking verified use of SSRM materials in products to eco-modulated EPR fees. Recycled content is a crucial component of circularity, but ESPR must also consider other approaches (such as SSRM) that can yield substantially lower environmental footprints, especially for natural fibres.

The industry recognises that harmonised definitions/criteria, reliable certification frameworks and clear verification methodologies will be needed for SSRMs to enable integration within the ESPR framework. SSRM are renewable materials that are continually replenished at a rate equal to or

greater than the rate of depletion and that can reduce impacts and support benefits for climate, nature, people, and animals (as described by the United Nations Development Programme, the Ellen MacArthur Foundation, and Textile Exchange).

These technologies are fully complementary to recycling and may provide an alternative to recycled content targets; they include:

- Next-generation raw materials, such as materials produced directly from industrial carbon capture emissions.
- Resource-efficient manufacturing, such as dope-dyed fabrics, which bypass traditional dyeing processes to achieve massive water and energy savings.
- Alternative feedstocks, including artificial fibres manufactured from biobased waste.
- Responsibly sourced natural and forest fibres, including cotton, linen, flax, hemp, wool, down and man-made cellulosic fibres from sustainably managed forests or agricultural systems, where certified to credible standards under the ISEAL framework or the EU Ecolabel criteria.

All of these approaches are complementary and should be holistically considered, recognized, and incentivized within the ESPR framework to truly minimize the industry's overall environmental impact. At the same time, the industry recognises that robust information requirements on sustainably sourced materials require harmonised definitions, reliable certification frameworks and clear verification methodologies before they can be effectively integrated into the ESPR framework.

On organic content specifically, FESI supports the use of Regulation (EU) 2018/848 as the legal reference point for any future information requirements concerning organic content, in order to ensure coherence and legal certainty across EU legislation.

6. Environmental Footprint requirements

FESI recognises the value of Life Cycle Assessments (LCAs) and Product Environmental Footprint Category Rules (PEFCRs) as analytical tools capable of identifying environmental hotspots and supporting evidence-based policymaking. Environmental footprint methodologies can provide useful insights for manufacturers and policymakers regarding supply-chain impacts, process optimisation and environmental improvement opportunities.

At the same time, FESI strongly cautions against transforming LCA-based methodologies into mandatory consumer-facing communication tools, market-access requirements or performance obligations under the first Textile Delegated Act. LCA outcomes remain highly dependent on methodological assumptions, system boundaries, allocation rules and data quality; as a result, they cannot be interpreted as absolute or universally comparable sustainability indicators. This is particularly apparent in areas such as microplastics, where robust and commonly accepted methodologies for calculating environmental impacts are still lacking. FESI further stresses that environmental performance in the textile sector cannot be reduced to simplified numerical scores or standalone carbon indicators. Such approaches risk oversimplifying complex environmental impacts, creating misleading comparisons between fundamentally different products and generating unintended trade-offs between climate, water, chemicals, biodiversity and resource-efficiency objectives.

Recommendations:

- FESI considers environmental footprint methodologies acceptable only as voluntary tools aimed at supporting evidence generation and internal environmental improvement strategies. FESI therefore opposes the introduction of mandatory environmental footprint information or performance requirements, as well as standalone carbon footprint methodologies under the first Textile Delegated Act.
- Any future move from voluntary to mandatory environmental footprint disclosure or performance requirements under subsequent revisions of the Textile Delegated Act should be conditional on the maturity of three preconditions: i) a fully harmonised EU methodology; ii) availability of credible, comprehensive and accessible EU-wide secondary databases at sufficient granularity; and iii) robust verification mechanisms ensuring data quality and comparability across operators. Without these preconditions, mandatory requirements risk imposing disproportionate costs and producing inconsistent or misleading outcomes.
- Consequently, we oppose the introduction of standalone carbon footprint indicators as simplified sustainability signals. A carbon-only metric covering just 6% of total lifecycle impacts is too narrow to drive meaningful differentiation and risks impact transfers: designs optimised for lower manufacturing carbon may increase water use, land use, or ecotoxicity, disregard biodiversity, chemicals management, and resource efficiency – with no regulatory signal to the contrary.
- We strongly oppose the exclusion of raw material impacts (LCS1) from the environmental footprint framework⁷. Raw material extraction and fibre production represent a major share of textile lifecycle impacts; excluding these stages would therefore provide only a partial and potentially misleading representation of environmental performance⁸.
- FESI raises strong concerns regarding the communication of standalone numerical environmental scores or classes of performance to consumers. Such methodologies are not robust enough to ensure meaningful comparisons between products with fundamentally different functions, constructions and material intensities, and would remain difficult for non-expert consumers to interpret correctly.
- FESI additionally calls on the JRC to revise its assessment of manufacturing impacts, as the current approach relies on an incomplete legal proxy rather than actual environmental performance. Comparing selected emission rules in only a few countries and across a limited number of

⁷ The exclusion of Life Cycle Stage 1 (LCS1) is methodologically flawed, as standard LCA practices and 2006 IPCC Guidelines for National Greenhouse Gas already ensure parity by using a 20-year cut-off for land use change, mirroring the exclusion of geological oil formation. This also means that, although the impact of synthetic fibres doesn't include any impact which could have led to oil formation, historical deforestation is equally not factored into the impact of natural fibres. Environmental footprinting focuses on the impacts of human activities rather than natural processes that occur independently of the industrial system. To claim a bias because the geological formation of oil is excluded is logically inconsistent - it is equivalent to arguing that an irrigation footprint is flawed for ignoring the formation of the oceans, or that agriculture is biased for not accounting for the millennia of biogeochemical processes required for soil formation.

⁸ Excluding LCS1 also removes the market incentive for sustainable sourcing: brands investing in recycled, bio-based, or lower-impact fibres receive no recognition, as their products are assessed identically to conventional alternatives. While energy efficiency and the energy mix are important, they represent only a small part of ecodesign, and manufacturers are already encouraged to act in these areas. Focusing exclusively on LCS2 would obscure the environmental benefits achievable through LCS1 design options, leaving energy-related improvements as the only visible measure.

indicators does not provide a scientifically sound basis for rating non-EU production as lower-performing. The assessment should account for the full set of applicable national and regional rules⁹, including stricter provincial standards where relevant, as well as industry standards, renewable energy uptake and process-level investments by suppliers. Without this correction, the framework risks misrepresenting global production impacts and discouraging investments in cleaner manufacturing technologies.

- FESI calls for a fully harmonised EU approach to environmental footprint methodologies and environmental labelling. **Irrespective of whether an EU framework is ultimately established or environmental footprint disclosure remains voluntary, Member States should be prevented from introducing divergent national schemes**, which would fragment the Single Market, increase compliance burdens, undermine consumer trust and threaten the objectives of the EU's regulatory work on ensuring green claims are not misleading consumers.
- Regarding data sources, FESI supports the use of both primary and secondary options, provided that transparency is ensured regarding the type of data used.
- The implementation costs associated with environmental footprint methodologies are currently substantially underestimated. Beyond labelling obligations, companies would face significant expenditures linked to LCA development, data collection, IT infrastructure, DPP integration, traceability systems and compliance management, particularly during the initial implementation phase. These costs would be especially burdensome for SMEs and smaller operators, and could ultimately increase product prices for consumers, contrary to the ESPR objective of ensuring that sustainable products remain accessible and affordable.
- Moreover, the framework should recognise the trade-offs between cost, data availability and comparability. While the use of secondary data may reduce costs compared to primary data collection, it also limits the ability to make meaningful comparisons between products, particularly where some products rely on primary data and others on secondary datasets. This runs the risk of creating inconsistent or misleading outcomes, while still imposing significant compliance costs on companies.
- Finally, FESI calls for a minimum transition period of 48 months following the entry into force of any environmental footprint-related provisions, given the methodological complexity of these systems and the substantial investments required across global supply chains.

⁹ Examples shared by FESI with the JRC include, from legislation effective in China: Discharge Standard of Water Pollutants for Textile Dyeing and Finishing Industry ([GB 4287-2012](#)), Integrated Wastewater Discharge Standard ([GB 8978-1996](#)), Discharge Standard of Main Water Pollutants for Textile Industry in Jiangsu Province ([DB 32/3432-2018](#)), Water Pollutant Emission Limits of Guangdong Province ([DB 44/26-2001](#)).

7. Substances of Concern (SoCs)

FESI supports a pragmatic, proportionate and legally coherent approach to substances of concern (SoCs) under the ESPR framework. Existing chemicals legislation, notably the REACH Regulation (EC) No 1907/2006 and Regulation (EU) 2019/1021 on Persistent Organic Pollutants (POPs), should remain the primary framework governing chemical risk management and substance restrictions in textile products. ESPR obligations should avoid duplicating existing legislation, creating technically unfeasible traceability obligations or undermining circularity objectives. Obligations presuming perfect traceability of legacy substances in recycled materials risk discouraging recycled content uptake and slowing the development of textile-to-textile recycling systems.

Recommendations:

1. SoCs (a) and (c)

FESI supports maintaining the existing 0.1% w/w threshold¹⁰ for SoCs (a) and SoCs (c), in line with REACH Article 33 and the Waste Framework Directive, to ensure legal certainty, consistency across EU legislation and compatibility with existing Safety Data Sheets (SDS) and Restricted Substances List (RSL) systems. We additionally call for clear and accessible lists of in-scope substances, including Chemical Abstracts Service (CAS) numbers and harmonised transition periods whenever new hazard classifications are introduced.

2. SoCs (b)

FESI considers the use of Globally Harmonised System (GHS) thresholds under Table 1.5.1 broadly appropriate as a basis for SoCs (b), as this allows reliance on existing SDS-based traceability systems and avoids disproportionate testing obligations.

At the same time, we wish to highlight that Classification, Labelling and Packaging Regulation (CLP) hazard classifications are hazard-based classifications for substances and mixtures and do not necessarily reflect actual risk in finished textile articles, as substances can often become chemically bound to fibres during manufacturing and no longer present the same exposure profile. Automatically transposing CLP concentration limits into article-level disclosure obligations would therefore risk generating disproportionate administrative burdens without meaningful additional safety benefits. FESI also notes that certain hazard classes, particularly persistent, bioaccumulative, and toxic (PBT) and very persistent and very bioaccumulative (vPvB) substances, remain insufficiently harmonised under GHS, creating additional legal uncertainty.

3. SoCs (d)

FESI strongly opposes the proposed approach for SoCs (d), particularly where substances are identified solely because they are already restricted under REACH or POPs legislation.

Criterion (d) under ESPR Article 5(14) concerns substances that technically hinder reuse or recycling processes, which is fundamentally different from intrinsic hazard-based restrictions. Whether a substance genuinely hinders recycling depends on the specific recycling technology

¹⁰ Lower thresholds would likely be driven primarily by analytical detectability rather than actual risk relevance and would create disproportionate administrative and economic burdens, particularly in highly complex textile supply chains involving numerous suppliers, materials and components.

and process conditions involved¹¹; there is therefore currently no scientifically robust basis for establishing horizontal SoCs (d) lists or generic concentration thresholds across the textile sector. Requiring disclosure of substances already prohibited above legal thresholds would, additionally, effectively amount to declaring legal non-compliance, creating duplication and administrative burden without additional safety benefits.

FESI finally strongly opposes the use of private voluntary schemes such as AFIRM, ZDHC or Bluesign as regulatory reference points under ESPR. While valuable as voluntary supply-chain tools, these initiatives operate outside the EU legislative framework and differ significantly in scope, methodologies and thresholds.

4. Calculation methodology and scope

FESI strongly recommends full alignment with ECHA's "Once an Article, Always an Article" methodology established under REACH following Case C-106/14. Diverging calculation methodologies under ESPR would create inconsistent disclosure obligations across EU legislation. We consider SDS-based traceability preferable to systematic analytical testing, which would be economically and technically unfeasible across global textile supply chains. At the same time, clearer guidance is needed regarding intentionally added substances, process chemicals and SDS reporting requirements to avoid inconsistent implementation. FESI additionally supports limiting disclosure obligations to intentionally added substances remaining present in finished articles above relevant concentration thresholds. Process chemicals that react, transform or are removed during production should remain outside the scope of disclosure requirements.

5. Transition periods and implementation

Meaningful chemical traceability will require substantial upstream changes across the global chemical and textile supply chain, including greater international harmonisation of GHS and SDS systems. FESI strongly opposes the proposed 18-month transition period for SoC information requirements and calls for a minimum implementation period of 36 months, while recognising that SMEs may require up to 48 months to establish adequate traceability and compliance systems. For substances not currently recognised under GHS frameworks, FESI supports the proposed 8-year transition period given the absence of harmonised analytical methods and globally harmonised chemical traceability systems.

6. Performance requirements

FESI agrees with the JRC conclusion that no sufficient scientific basis currently exists for introducing ESPR performance requirements related to specific chemical substances in textile products. Chemical restrictions and risk management should remain governed by existing REACH and POPs legislation unless specific substances are conclusively demonstrated to create technical barriers to recycling processes.

¹¹ Quoting AFIRM: "To the best of our knowledge, there are no substances that functionally prevent or hinder textile-to-textile recycling. However, we are concerned about substances restricted – or proposed for restriction – under REACH and other global chemical legislation without pragmatic consideration of established textile recycling processes (see Appendix A for specific examples). Post-consumer mechanically recycled textiles cannot consistently meet the ever-growing list of substance restrictions that second-hand garments are typically exempt from. It is critical that the European Commission take steps to safeguard Europe's existing textile recycling industry and circularity goals from substantial threats posed by chemical restrictions."

8. Textile Labelling Regulation (TLR)

FESI supports the ongoing work on the revision of the Textile Labelling Regulation (TLR), which remains one of the most important horizontal legislative frameworks governing product information requirements for the sporting goods sector. Given the substantial evolution of textile supply chains, fibre technologies, circularity objectives and digitalisation since the Regulation's adoption more than a decade ago, the industry considers that a targeted and proportionate revision is both justified and necessary.

At the same time, the revision should remain focused on addressing clearly identified technical shortcomings while avoiding unnecessary expansion of the Regulation's scope or duplication with other legislative frameworks, notably the ESPR, REACH and the GPSR. In particular, FESI calls for close alignment between the TLR and ESPR regarding scope, product coverage and information requirements, to ensure that companies are not required to communicate the same or similar information through overlapping labels, formats or channels. The revision should be guided by the broader objectives repeatedly highlighted by the European Commission itself: simplification, harmonisation, legal coherence and reduction of unnecessary administrative burdens across the Single Market.

FESI is therefore in favour of a **targeted** and technical revision of the TLR focused on enabling digitalisation, improving legal clarity, modernising outdated technical provisions and facilitating circularity objectives, while avoiding the introduction of disproportionate new labelling obligations.

Recommendations:

1. Digital labelling and circularity

FESI strongly supports a full transition to digitalisation within the TLR revision, as it would improve consumer access to information, reduce operational and compliance burdens for economic operators, and enhance textile circularity outcomes, while reflecting industry data about realistic consumer behaviour¹².

To enable this shift, fibre composition, care instructions, and other non-critical consumer information should be provided digitally via a QR code or similar data carrier, simplifying access to product information and streamlining compliance, with physical labels being limited to essential information such as safety instructions. In addition, digital labelling would ensure that key information such as fibre composition remains accessible throughout the full product lifecycle, including at end-of-life, which would support more efficient sorting, improve recyclability, and strengthen alignment with the future Digital Product Passport under the ESPR. In this context, FESI

¹² Around 70% of consumers remove labels after purchase, limiting their usefulness and undermining EU objectives on product care, reuse, and circularity. This points to a clear preference for minimal physical labelling, with more complete information provided digitally

also supports greater flexibility regarding the communication of recycled content and fibre characteristics¹³.

Beyond environmental benefits, an e-labelling system would also deliver cost efficiencies for brands and manufacturers by reducing label redesigns, simplifying packaging requirements, lowering material waste, and decreasing administrative complexity linked to multiple market-specific versions.

2. Simplification and technical improvements

Beyond digitalisation, FESI supports several targeted technical improvements within the TLR framework, including:

- modernisation of fibre names according to international standards;
- streamlined registration and classification procedures for new fibres;
- updated testing methodologies to avoid fragmentation at national or regional level;
- clearer exclusion rules;
- voluntary use of standardised symbols
- simplified language requirements;
- updated tolerance margins for fibre composition – from 3% to 5%, allowing greater flexibility for brands to include recycled fibres, whose composition can vary from batch to batch.

These targeted measures would improve regulatory clarity and implementation feasibility while supporting innovation within the textile sector.

FESI particularly stresses the importance of ensuring alignment and coherence between the TLR revision and other horizontal EU legislation, notably the ESPR framework. Improved interoperability between fibre composition information, DPP systems and future circularity requirements would significantly reduce compliance complexity and support more effective implementation across global supply chains.

3. Risks and red lines

While supportive of a targeted revision, FESI opposes extending the TLR into broader sustainability or environmental disclosure domains already covered under other EU legislation.

In particular, FESI warns against:

- duplication with existing EU legislation (e.g. ESPR, REACH or GPSR);
- contradictory labelling obligations;
- rigid harmonisation of label formats or layouts;
- mandatory standardised symbols;
- internationally misaligned sizing or origin requirements creating technical trade barriers;
- extension of the initial TLR scope to cover new labelling domains;
- disproportionate compliance burdens.

TLR should remain a technical product information framework rather than evolve into an overarching sustainability communication instrument.

¹³ The current TLR framework does not provide straightforward mechanisms to communicate recycled fibre content directly within fibre composition declarations. More modern and flexible terminology reflecting recycled, bio-based or innovative fibre types would improve clarity and better reflect market realities.

9. Horizontal methodological concerns and environmental assessments

FESI is concerned that parts of the JRC environmental assessment rely on incomplete, overly simplified and geographically unbalanced assumptions. As currently drafted, the methodology risks misrepresenting the environmental performance of global textile supply chains and drawing conclusions insufficiently robust to support future ecodesign requirements.

In particular, the current assessment relies excessively on legislative proxies and comparisons of selected regulatory frameworks rather than on:

- actual production technologies;
- industrial and manufacturing practices;
- renewable energy investments;
- operational environmental performance across textile supply chains.

FESI welcomes the JRC's revised wording acknowledging that non-EU production "could" increase environmental impacts rather than automatically doing so; however, the practical outcome of the assessment still appears to systematically disadvantage non-EU manufacturing despite the diversity of production realities and environmental investments across global supply chains. Moreover, the current assessment covers only a limited number of countries, does not adequately reflect regional and provincial differences, and overlooks stricter local environmental standards and ongoing investments in cleaner technologies within manufacturing countries.

FESI therefore strongly calls for:

- more granular, scientifically robust and geographically representative methodologies – as well as recognition of said methodologies in setting the ecodesign requirements;
- broader consultation with manufacturing countries regarding applicable standards and production realities;
- greater recognition of real-life production practices, technological investments and renewable energy uptake across global textile value chains.

10. Digital Product Passport (DPP)

FESI supports the objectives of the Digital Product Passport (DPP) and recognises its potential to improve transparency, traceability and access to product-related information across the textile value chain. If implemented proportionately and through a realistic timeline, the DPP could facilitate repair, resale, authentication and consumer access to sustainability information, while also contributing to label harmonisation and operational efficiencies over time.

At the same time, FESI stresses that the effectiveness and feasibility of the DPP will depend fundamentally on the proportionality of information requirements, the interoperability of systems and the avoidance of regulatory duplication across EU legislation. Significant uncertainty remains regarding the future scope, granularity and governance of DPP data requirements, while implementation across complex global supply chains will require substantial investments in digital infrastructure, traceability systems and data management processes. The DPP framework must remain technology-neutral, operationally feasible and coherent with other legislative instruments, including the future revision of the Textile Labelling Regulation, the Empowering Consumers Directive and potential ESPR labelling requirements.

Recommendations:

- FESI supports a phased and proportionate implementation of the DPP, with mandatory information requirements initially limited to core product data and progressively expanded over time as technologies, traceability systems and data availability mature across the value chain. Any additional information requirements should be useful, proportionate and clearly linked to the objectives of the DPP, while avoiding duplication with other EU or national information requirements.
- FESI calls for operators to be allowed to include additional information in the DPP on a voluntary basis, provided that it is relevant, reliable and clearly distinguished from mandatory data points. This flexibility is important because brands are increasingly requested by retailers and other value-chain actors to provide product-level sustainability information that may fall outside the mandatory DPP dataset. Where such information supports value-chain communication, consumer engagement, responsible product use, repair, care or end-of-life behaviour, operators should be able to make it available through the DPP rather than relying on separate and potentially duplicative data systems. Voluntary content should nevertheless remain optional, product-relevant and subject to appropriate safeguards against misleading claims, without creating new compliance obligations or being treated as part of the mandatory DPP requirements.
- FESI strongly supports maintaining technological neutrality regarding data carriers and digital identifiers, in line with the ESPR legal text. Companies should retain flexibility regarding the technologies most appropriate for their products and business models.
- FESI additionally stresses the importance of interoperability across systems and supply-chain actors. The DPP should rely on internationally recognised standards and remain compatible with existing databases and digital infrastructures in order to avoid duplication of submissions and unnecessary administrative burdens.
- FESI is concerned about the risk of fragmentation and data-carrier proliferation across EU legislation and supports the DPP functioning as a centralised and harmonised platform for product-related information in order to avoid multiple digital identifiers, inconsistent requirements and increased compliance costs. In this context, FESI also calls for clear coordination between the DPP, the future revision of the Textile Labelling Regulation and any future ESPR label.
- FESI stresses that the implementation costs associated with the DPP are currently underestimated. Beyond labelling obligations, companies will face substantial expenditures linked to IT infrastructure, QR/Rfid integration, traceability systems, data sourcing, audit preparation and DPP governance across multi-tier global supply chains.

- Regarding governance and hosting, FESI supports clear rules on data ownership, access rights, system monitoring and business continuity. Mandatory back-up hosting obligations, if maintained, should remain limited to storage-only functions.
- FESI additionally stresses the importance of harmonised but flexible approaches regarding placement of data carriers on textile products. Consumer-facing solutions such as QR codes should remain easily accessible while allowing sufficient flexibility to account for different product designs and labelling practices.
- Finally, FESI calls for comprehensive impact assessments covering both the environmental benefits and competitiveness implications of the DPP framework, as well as sufficiently long transition periods to allow companies to adapt global supply chains and digital infrastructures in an operationally feasible manner.

11. ESPR label and classes of performance

FESI supports the objective of improving consumer access to sustainability information under the ESPR framework. At the same time, we consider it premature to establish an ESPR label at this stage, while the Digital Product Passport (DPP), ecodesign requirements under the Textile Delegated Act and the revision of the Textile Labelling Regulation (TLR) remain under development. Introducing a new horizontal ESPR label before the underlying methodologies, indicators and product-specific requirements are fully defined risks creating duplication, regulatory complexity and consumer confusion. The DPP is already expected to provide much of the information currently envisaged for the ESPR label, making the additional value of a separate physical label unclear.

FESI further stresses that textiles present significant comparability challenges. Products with fundamentally different functions, constructions, material compositions and performance requirements cannot be meaningfully compared through simplified aggregated scores or horizontal performance classes. The logic underpinning the EU Energy Label cannot automatically be transposed to textiles and other consumer products, where no single universally relevant indicator exists across all categories. For this same reason, FESI does not support the introduction of classes of performance for textile products at this stage, as there is currently no sufficiently robust technical or methodological basis to justify such categorisation, nor clear evidence that performance classes would deliver meaningful cost savings or proportionate value for consumers. More broadly, FESI considers that any future consumer-information framework should prioritise **digitalisation**, simplification and coherence across EU legislation, while avoiding overlapping physical and digital communication tools.

Recommendations:

- FESI calls on the Commission to postpone the development of an ESPR label until after the DPP and ecodesign requirements under the Textile Delegated Act are fully developed and assessed. Only at that stage will it be possible to evaluate whether an additional consumer-facing tool is necessary and what its appropriate scope and content should be.
- FESI strongly opposes the adoption of horizontal labelling requirements under Article 16(5) ESPR before product-specific methodologies and indicators are defined. In line with the joint industry statement of March 2026¹⁴, FESI supports either:
 - the deletion of Article 16(5); or
 - at minimum, the suspension of implementing acts related to common ESPR label layouts until sufficient product-specific delegated acts have been adopted.
- FESI considers that any future label should be:
 - digital-first and fully integrated into the DPP;
 - aligned with other EU instruments, notably the TLR;
 - symbol-based and language-neutral;
 - developed through product-specific delegated acts rather than horizontal rules.
- FESI additionally stresses that mandatory physical multilingual labels would create significant operational burdens and undermine Single Market simplification objectives. Symbols and icons should therefore remain the primary communication tool, with additional information accessible digitally through the DPP.
- FESI further calls for any required icons or symbols to be provided by the Commission as harmonised open-source vector files in order to ensure consistency and reduce administrative burdens for companies.
- FESI opposes the use of aggregated environmental scores and simplified performance classes for textiles. Such approaches risk oversimplifying highly complex methodologies and generating misleading comparisons between fundamentally different products, fibres and use cases.
- FESI additionally highlights the risk of “structural waste” linked to detailed physical labels. Changes in methodologies, certifications or sustainability data could rapidly render pre-printed labels obsolete, whereas digital-first solutions would allow information to be updated dynamically without generating additional waste or supply-chain disruptions. This concern is reinforced by the practical reality that physical labels and hangtags are often removed or discarded shortly after purchase, limiting their effectiveness as long-term information tools while still creating additional material use and waste.
- Finally, FESI stresses that any future label should remain sufficiently flexible to accommodate the diversity of consumer products covered under ESPR. Overly prescriptive horizontal formats risk becoming unsuitable for product-specific requirements identified in future delegated acts, potentially requiring costly future redesigns and regulatory revisions.

¹⁴ [Joint Statement on Article 16\(5\) of the ESPR](#)

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.

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