

EURATEX Position Paper

# Textiles Labelling

EURATEX



THE EUROPEAN APPAREL  
AND TEXTILE CONFEDERATION



EURATEX welcomes and supports the EU Commission ambition to revise the Textiles Labelling Regulation No 1007/2011. EURATEX retains that the Regulation has overall served its purpose and delivered its overarching objectives, namely providing useful information to the consumer on the properties of the textile products. Nevertheless, in the light of technical progress, societal changes and the evolution of the regulatory framework for textiles following the adoption of the EU strategy for sustainable textiles, a revision of Regulation 1007/2011 is necessary to ensure regulatory coherence.

Taking into account that the adoption of the textiles strategy will generate 16 new pieces of regulation applicable to our sector, we believe that the scope of the Labelling Regulation should focus on two main pillars: fibre composition and care instruction.

In addition, the elements of digitalisation, leather and fur authenticity should be considered as complementary aspects that – if integrated in the legal text – should improve the overall performance of the regulation in providing information to the consumer.

Finally, the revision should take into account that textiles manufactured in the EU are sold both on the EU market as well as on foreign market. The revised regulation should therefore consider the main elements of the labelling requirements of the main destination markets of the EU exports, in particular the US and the UK.

EURATEX and its members recommend the EU Commission to focus its effort to revise the Regulation on these four main elements:

### **1. Fibre composition: man-made cellulosic fibres & recycled fibres**

Fibre composition provides crucial information to consumers, ensuring transparency and enabling them to make informed choices about the textiles they purchase. By clearly stating the type and percentage of fibres used in a textile product, consumers can assess its quality, durability, and suitability for their needs.

Labelling fibre composition also plays a significant role in promoting fair competition and protecting the interests of both consumers and manufacturers. Accurate labelling ensures that manufacturers adhere to industry standards and regulations, preventing deceptive practices such as misrepresentation or substitution of materials. This fosters fair competition among businesses, as consumers can rely on accurate information to compare products and make purchasing decisions based on their preferences and needs.

Since the entry into force of the current legislation (Reg. EU 1007/2011), the labelling requirement have served well the purpose to foster fair materials competition in a neutral, transparent way, while at the same time providing clear information to consumers.

However, since 2011, thanks to technological development many new fibres entered the market and labelling their presence in products has sometimes proved difficult for economic

operators. The procedure currently set out by the Regulation to apply for a new fibre name, as established in Annex II, is too burdensome and uncertain for the many innovative SMEs who have developed these new fibres. EURATEX encourages the Commission to revise the mechanism to update the fibres names list with the aim of making the process less burdensome, faster and more open to technological development – also reminding that new names should always reflect the material of which the fibre is made of, rather than the process used to manufacture the fibre.

When applicable, the presence of recycled content should be indicated on physical labels as a voluntary additional information, to inform the European consumer and enable them to opt for textiles with a lower carbon footprint and contribute to circularity.

To prevent false green claims or incorrect interpretation of the notion of recycled content on the textile label, the definition of recycled fibre needs to be further developed. On this, EURATEX is committed to make a positive contribution under the workstream of the Ecodesign Regulation. In order to ensure the alignment across all the different pieces of legislation that will be applicable to textiles products, the new Labelling regulation should adopt the definition of recycled fibres which is being developed under that workstream (Ecodesign). We encourage the Commission to consider these elements while drafting the legal proposal. Lastly, given that the Commission has presented a legal proposal for a Directive on Green Claims in March 2023, we deem superfluous to regulate the use of the “recycled” claim within the framework of the Textiles Labelling Regulation.

## 2. Care instructions

Care instructions, together with the element fibre composition, should be the essential pillar of the Regulation. These instructions provide valuable guidance on how to properly clean and maintain the product, ensuring its longevity and preserving its quality. Such instructions should be listed in a physical label that accompanies the textile item, constituting an essential element of the label.

Firstly, it serves as a convenient and immediate reference point for consumers, allowing them to access the necessary care information, avoiding the obstacles posed by the digital divide. This is particularly beneficial for individuals who may not have easy access to digital devices or who prefer a more tactile and straightforward approach. Additionally, physical labels are durable and resistant to wear and tear, ensuring that the care instructions remain intact and legible throughout the lifespan of the product. Unlike digital labels, physical labels eliminate the risk of technical malfunctions, internet connectivity issues, or device dependency, making them a reliable, accessible and non-discriminatory source of information. Ultimately, by mandating to provide care instructions on physical labels, the EU would prioritize the consumer’s right to information, promote product longevity, and simplify the process of maintaining textile items all along the value chain.

Secondly, making the display of care instructions on the label mandatory at EU level will contribute to a more harmonised regulatory framework across the EU, thus reducing compliance costs. Currently, only ten EU Member States require care labelling by federal or consumer protection acts, while the remaining Member States offer recommended option for care labelling. Therefore, while retaining the choice to provide care information using either words or pictograms under the ISO 3758 and ISO 30023 standard (voluntary choice), which are already implemented by many important EU trade partners, EURATEX stands for physical display of care instructions on the sewn label, mandatory all across the EU.

### 3. Fur and leather authenticity

EURATEX supports the introduction of a labelling requirement to communicate the presence of authentic leather and fur in the product. The EU textiles industry is facing increasing competition from low-cost producers and counterfeit products that use synthetic materials instead of natural leather and fur.

On the other hand, the opposite may also happen, as producers in third countries may use natural leather and fur to manufacture cheap products and mislabel them as artificial, inducing confusion in consumers. Therefore, increasing transparency and reliability of the information which is passed on to the consumer is key to creating a level playing field and to ensuring fair competition.

Labelling leather and fur authenticity is important for the EU textiles and clothing industry to protect its reputation, quality and value in the global market. The incorporation of this element into the revised Regulation will help the industry to ensure compliance with highest environmental and animal welfare standards and have a recognition for it. In addition, ensuring clear and correct information on the authenticity of leather and fur will help the consumer in making informed purchase choices that will take into account the issue of durability of these materials.

Last, but not least, we believe that the incorporation of this provision can be done without changing the definition of "textile product", currently set out in art. 3.a of Regulation 1007/2011. Separated definitions for natural fur and leather could be added to the Regulation without amending the remaining text of the article. Moreover, given these distinct definitions and the nature of these materials, specific rules should be developed or updated for textile fibres on the one hand, and leather and fur on the other. The creation of two or three parallel set of definitions within the regulation would ensure the inclusion of leather and fur without creating any confusion or contradiction. Dedicated attention should be paid to possible areas of overlap, such as rules on "multi-component textile products."

#### 4. Digitalisation: interface with Digital Product Passport and ESPR

Digitalisation plays an important role in ensuring access to information to the consumer. In the recent years, we have seen the proliferation of digital platforms that concur in providing all sorts of information about textiles. While it is indeed important to consider the digitalisation element and to include it in the textile labelling system of the future - taking into account various technological tools that could be implemented - EURATEX believes that digitalisation should complement, rather than replace, physical labels. The main purpose of digital labels should be to reduce the abundant amount of information which is currently on the physical labels. By requiring only the very essential information on the physical labels (fibre composition and care instructions), the new Regulation would ensure that European consumers can actually understand and be informed about the features that really matter about a garment.

As a matter of fact, physical labels must remain the main tool to pass on essential information to the consumer, namely fibre composition and care instructions of the garments they buy. Physical labels also ensure legal compliance with the regulations of different countries and regions, such as the Textile Products Regulations in the UK or the correspondent regulations in Brazil, South Korea and Japan. While digital labels may offer some advantages, such as reducing waste and enhancing traceability, they cannot replace physical labels entirely. Given the digital divide observed in Europe, digital labels may not be accessible to all consumers, especially those who do not have smartphones or internet access. Therefore, physical labels should remain the primary source of essential information for textile products, such as fibre composition and care instructions, while digital labels can be used to complement them with additional information, such as environmental or social impacts or other certifications.

In this regard, the Digital Product Passport is being developed in parallel to achieve more transparency and traceability in the field of the sustainability of a product in compliance with the ESPR requirements. In order to avoid any overlap, inconsistency and the creation of conflicting labelling systems and requirements, it is key to separate these two workstreams. The revised textile labelling regulation should create "placeholders" to incorporate the requirements established under ESPR and DPP, rather than duplicate those requirements, which may result in a redundant and unaligned set of incoherent legal requirements.

Furthermore, we call on the Commission to develop guidelines to facilitate the interpretation and harmonised implementation of the regulation across the EU.



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#### **About EURATEX**

As the voice of the European textile and clothing industry, EURATEX works to achieve a favourable environment within the European Union for design, development, manufacture and marketing of textile and clothing products.

The EU-27 textile and clothing industry, with around 190.000 companies employing 1.3 million workers, is an essential pillar of the local economy across many EU regions. With over €67 billion of exports, the industry is a global player successfully commercializing high added value products on growing markets around the world.

Working together with EU institutions and other European and international stakeholders, EURATEX focuses on clear priorities: an ambitious industrial policy, effective research, innovation and skills development, free and fair trade, and sustainable supply chains.

