

## **Technical Seminar 18**

# **Ecodesign for Sustainable Products Regulation: A game-changer for the textile sector?**

**31 January 2024**

The objective of this seminar was to learn of the proposed regulation for Ecodesign for Sustainable Products Regulation (ESPR) and the requirements for brands, suppliers, and other stakeholders in the sector, as well as to dive into the Digital Product Passport and what it means to start to implement ecodesign requirements in our supply chain. This proposal is at the heart of the EU's Green Deal and has been termed a game changer for the textile sector and its green transition. By establishing a framework for setting ecodesign requirements for specific product groups, including textiles, it aims to improve their circularity, energy performance, and other aspects of environmental sustainability. The Digital Product Passport for textiles will play a key role in this regulation, increasing transparency and unlocking circularity potential.

### **Summary**

In late 2019, the European Commission published its European Green Deal, the EU's new growth strategy to become climate-neutral by 2050 and to transform into a modern, resource-efficient, economy.

Under these strategies, the EU Commission has put forward several far-reaching legislative initiatives, many of which are expected to enter into force from 2025 and 2026 onwards. Introducing far-reaching new design requirements, greenwashing regulations, and rules to prevent overproduction and overconsumption.

The "Ecodesign for Sustainable Products Regulation" (ESPR) is one of these pivotal strategies that was proposed in March 2022 and will replace the current EU Ecodesign Directive. The publication of the Strategy for Sustainable and Circular Textiles soon followed, setting out a vision to ensure that: "By 2030 textile products placed on the EU market are long-lived and recyclable, to a great extent made of recycled fibres, free of hazardous substances and produced in respect of social rights and the environment." For groups of products that share sufficient common characteristics, the framework will also allow to setting of horizontal rules.

So, what are the tracking indicators for the ESPR? What exactly is a Digital Product Passport? What does a manufacturer or brand need to prepare for effective data collection?



**Tim Becker,**  
Senior Legal Advisor, REACHLaw Ltd.

A leading expert in registration, authorisation, and notification of chemical substances REACH law's expertise. Tim specializes in Chemical Regulatory Compliance and Sustainability.

Introducing the proposal, the ESPR's current final text is a 218-page document that includes a framework for setting ecodesign requirements. Products will have to comply with these requirements to be placed on the market or put into service, with the aim to improve their environmental sustainability in order to make sustainable products the norm, and to reduce their overall carbon and environmental footprint over their lifecycle. The final goal is to ensure their free movement within the internal market. The framework will also allow for the setting of a wide range of requirements, including on:

- product durability, reusability, upgradability, and reparability
- presence of substances that inhibit circularity
- energy and resource efficiency
- recycled content
- remanufacturing and recycling
- carbon and environmental footprints
- information requirements, including a Digital Product Passport

The new regulation will put in place minimum requirements such as efficiency, durability, and recyclability for almost any product on the EU market. It includes provisions to ensure the traceability of harmful substances in products, and the possibility to restrict them when they are a barrier to recycling, have a negative impact on human health, or negative impact on consumers in terms of affordability. The regulation would also welcome a ban on the destruction of unsold textiles, which will be effective a year after the law comes into force.



**Roman Houlbreque,**  
Director Partnerships, Retraced

One aspect of the ESPR is the creation of an EU Digital Product Passport. This DPP would help to support the new business model and framework for the ESPR, with the goal of transitioning to a circular economy by providing relevant information to downstream industry stakeholders.

The DPP will clearly define the product's sustainability, circularity, value retention for reuse, remanufacturing, and recycling factors. All this information would be managed and collected through an upstream supply chain network which would include mills, manufacturers, and brands. This data would then be stored in a type of data carrier so that a consumer could easily have access to the information. Although much is not yet known about the technical factors, such as what type of data carrier will be used, what track and trace identifiers, and who will have access rights, it is clear that standardization will be key. There will be one standard/protocol on how to read out DPP data for different stakeholders from the downstream supply chain: e.g., End-consumers, businesses (Sorters, Recyclers). The goal of the DPP would be to help consumers and businesses make informed choices when purchasing products, facilitate repairs and recycling, and improve transparency about products' life cycle impacts on the environment.



**Gabby Shiner-Hill,**  
Co-Founder, bureau\_555

Pioneers in fabric digitisation, Bureau\_555 helps brands and manufacturers create true-to-life digital garments by utilising fast digital workflows, reducing lead times, costs, and waste throughout the supply chain. Making digital technologies accessible throughout the supply chain for brands, manufacturers, and mills working towards a more sustainable & resilient future. With digitisation experience, the concept of a virtual supply chain is made a reality, creating a positive impact on the environment. By avoiding the wasteful practice of physical sampling, Bureau\_555 has currently been able to save 105,000 yards of textiles and approx 1.5

million KG of CO2. Being the perfect example of the effectiveness of a digital textile sector, and making feasible the Digital Product Passport. However, it is to be noted that responsibility falls to the buyers and brands to help level the playing field for the supply chain and support the manufacturers on how best to data collect.

## Key Takeaway Question

### What can a supplier or brand do now to prepare for the ESPR regulation?

- Tim Becker says: “Clear emphasis on studying the legal text, what is the bottom line of ESPR? And analyze the potential impacts it will have on your product. The key also is in participating as a stakeholder in the development activities being set out to help concrete this legislation ”
- Roman Houlbrequé says: “Start data collection now, although we are not sure what data will be expected, we can start learning how to collect information, either through water consumption, energy practices, etc. We will need additional resources to be able to share this data in one location and being able to cope with extra work will help guarantee success.”
- Gabby Shiner-Hill says: “Make sure to engage all departments and units in your business. While most work might normally fall upon a sustainability head or merchandiser, in the case of collecting data, all departments need to move towards this, and IT can be a cornerstone to help organize and track your data.”

To learn more, watch the [recording of Technical Seminar 18](#). The slides presented in this seminar are attached below. For more online seminars on similar topics, check out the [Asian Dialogues Series](#).

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Published by:

Deutsche Gesellschaft für Internationale  
Zusammenarbeit (GIZ) GmbH  
Registered offices Bonn and Eschborn, Germany

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Layout: Alsharq

On behalf of the Federal Ministry for Economic  
Cooperation and Development (BMZ)

As of 08 February 2024



Webex, 31 January 2024

# The upcoming EU Ecodesign for Sustainable Products Regulation & its impact for Textiles

*Tim Becker, Senior Legal Advisor*

*Webinar in cooperation with GIZ FABRIC: ESPR - a Game-changer for the textiles sector?*

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\* Upon entry into force

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REACH = Registration, Evaluation, Authorisation and Restriction of Chemicals

CLP = Classification, Labelling and Packaging of substances and mixtures

KKDIK = Kimyasalların Kaydı, Değerlendirilmesi, İzni ve Kısıtlanması

# ESPR & Impact for Textiles

## Agenda

- Introduction to ESPR
- Ecodesign requirements
- Digital Product Passport
- Destruction of unsold consumer products
- Duty holders and enforcement
- European Commission preparatory work for textiles
- Outlook on next steps and how industry can prepare

## NOTE

*This presentation is based on the ESPR final text as provisionally agreed between the European Parliament and the Council on 4 December 2023. It may still be subject to some changes due to lawyer-linguists revision. Once the ESPR is formally adopted and published in the Official Journal of the European Union, please refer to that version.*



# Introduction to ESPR

## ESPR at a glance

**REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL  
establishing a framework for setting ecodesign requirements for sustainable products, amending  
Regulation (EU) 2023/1542 and repealing [Ecodesign] Directive 2009/125/EC**

Framework for setting ecodesign requirements that products have to comply with to be placed on the market or put into service, with the aim to improve their environmental sustainability in order to make sustainable products the norm and to reduce their overall carbon and environmental footprint over their lifecycle, and to ensure their free movement within the internal market

Digital Product Passport

Mandatory Green Public Procurement requirements

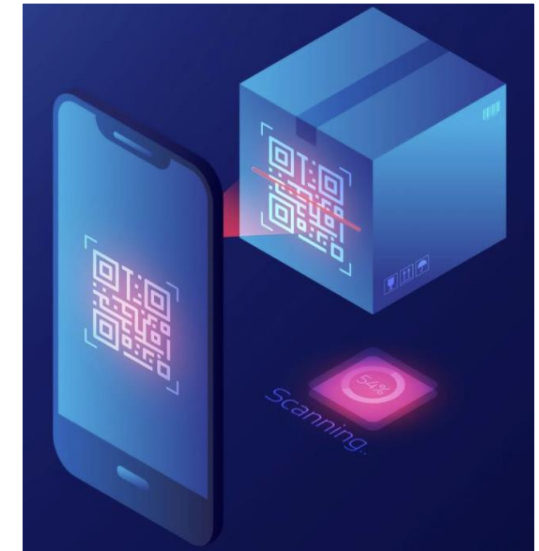
Framework to prevent unsold consumer products from being destroyed

- Details to be specified in European Commission (COM) delegated acts for specific product groups according to a working plan
- ESPR will affect products from both inside EU & imported
- Limited exclusions: Food, feed, medicinal products, products of human origin, motor vehicles; products whose sole purpose is to serve defence or national security shall be excluded from the product group
- Second-hand products (including those refurbished and repaired) originating from within the Union do not need to comply
- COM to evaluate inclusion of social aspects after 4 years

# Introduction to ESPR

## A lot to digest, and more to come...

- ESPR final text (*provisionally*):  
218 pages
  - Incl. 127 Recitals, 81 Articles, 8 Annexes
- Commission proposal + Impact Assessment of 30 March 2022
- To come
  - Adopted/published text
  - Further consultations and impact assessments
  - Delegated Acts
  - Implementing Acts
  - ...



- Duty holders
  - Conformity assessments
  - Technical documentation
  - Digital Product Passport
  - Labels
  - ...



# Introduction to ESPR

## ESPR and other key EU laws and initiatives governing sustainability aspects

Law/proposal	Status	Scope
Regulation (EC) No 1907/2006 ( <b>REACH</b> )	<b>In force. Revision on-going</b> under EU Chemicals Strategy for Sustainability (CSS)	Chemical safety: Processes on registration, evaluation, authorisation and restriction of substances. SDS, REACH Art. 33 reporting for CL SVHCs in articles
Regulation (EC) No 1272/2008 ( <b>CLP</b> )	<b>In force. Revision</b> under the CSS close to adoption	Chemical safety: Classification, labelling and packaging of substances/mixtures
Directive 2010/75/EU on industrial emissions ( <b>IED</b> )	<b>In force. 2022 revision</b> close to adoption	Main EU instrument regulating pollution from industrial installations
Regulation (EU) No 1007/2011 on <b>textile labelling</b>	<b>In force. Review on-going:</b> Public consultation 19 December 2023 – 14 April 2024	Textile fibre names and related labelling and marking of the fibre composition of textile products
Directive (EU) 2022/2464 as regards corporate sustainability reporting ( <b>CSRD</b> )	<b>In force. European Sustainability Reporting Standards (ESRS)</b> adopted in 2023. Specific standards are <b>planned</b> by 2026 for the manufacturing sector group, incl. textiles, apparels, footwear & accessories.	Reporting by large companies and listed SMEs on what they see as the risks and opportunities arising from social and environmental issues, and on the impact of their activities on people and the environment (sustainability information).
COM(2022) 71: Proposal for a Directive on Corporate Sustainability Due Diligence ( <b>CSDDD</b> )	<b>Co-legislative process on-going:</b> Provisionally agreed on 14 December 2023. Likely adoption in 2024. May apply to some companies from 2026.	Mandatory social aspects (human rights) and environmental impacts (risks) consideration by large companies (>500 employees, >€150MM net turnover), incl. in their value chain
COM(2022) 142: <b>ESPR Proposal</b>	<b>Co-legislative process on-going:</b> Close to adoption	Framework to regulate the environmental sustainability of products
COM(2022) 143: Proposal for a Directive on <b>Empowering Consumers for the Green Transition</b>	<b>Co-legislative process on-going.</b> Close to adoption, EU Parliament final vote on 17 January 2024	Amends the Unfair Commercial Practices Directive (UCPD) and the Consumer Rights Directive (CRD)
COM(2022) 677: Proposal for a Regulation on Packaging and Packaging Waste ( <b>PPWR</b> )	<b>Co-legislative process on-going.</b> Parliament adopted the ENVI report on 22 November 2023	Revision of Directive 94/62/EC on Packaging and Packaging Waste (REFIT)
COM(2023) 166: Proposal for a Directive on substantiation and communication of explicit environmental claims ( <b>Green Claims Directive</b> )	<b>Co-legislative process on-going.</b> Joint committee procedure in EU Parliament (IMCO&ENVI)	Minimum requirements on the substantiation and communication of voluntary environmental claims and environmental labelling in business-to-consumer commercial practices
COM/2023/420: Proposal for a Directive amending Directive 2008/98/EC on waste ( <b>WFD</b> )	<b>Co-legislative process on-going.</b> Council favourable reception on 23 October 2023. Vote in EU Parliament planned in March 2024	Including mandatory and harmonised Extended Producer Responsibility (EPR) schemes for textiles, textile-related and footwear products across all EU countries, with eco-modulation of fees.

# Ecodesign Requirements - **Product aspects\***

Durability      Reliability

Reparability      Possibility of maintenance and refurbishment      Upgradability      Reusability      Possibility of remanufacturing

   Possibility of recycling      Presence of substances of concern

Energy use and energy efficiency      Water use and water efficiency      Resource use and resource efficiency

                 Recycled content      Possibility of recovery of materials

Environmental impacts, including carbon and environmental footprint



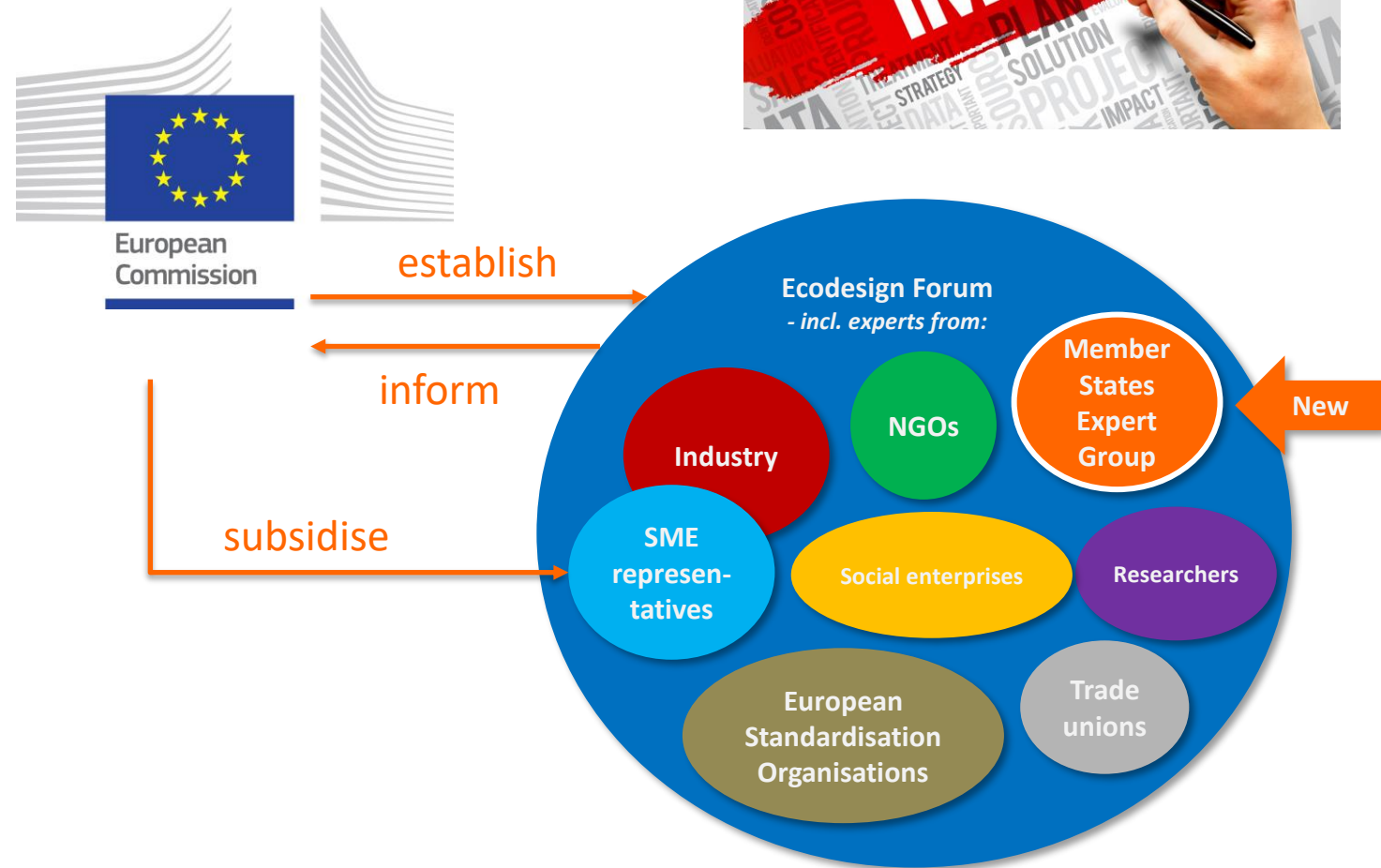
Expected generation of waste

\*As listed in Article 5(1) lit. (a)-(n). See also ESPR Annex I, specifying 'product parameters'

# Ecodesign requirements

## Criteria and process

- ✓ **No significant** negative impact on the **functionality** of the product, from the perspective of the user
- ✓ **No** adverse effect on the **health and safety** of persons
- ✓ **No significant** negative impact on **consumers** in terms of **affordability**
- ✓ **No disproportionate** negative impact on the **competitiveness** of value chain actors, incl. SMEs
- ✓ **No proprietary technology** imposed on manufacturers or other actors in the value chain
- ✓ **No disproportionate administrative burden** on manufacturers or other actors in the value chain, incl. SMEs





# Ecodesign requirements

## Types



### Performance requirements

### Information requirements

<p><b>Product-specific</b> i.e. per product group but may be differentiated for any specific product in that group</p>	<ul style="list-style-type: none"> <li>✓ <b>Quantitative (thresholds)</b> e.g. limit on quantities of a material incorporated, minimum recycled content, limit on energy used</li> <li>✓ <b>Non-quantitative</b> e.g. restriction of substances inhibiting circularity</li> </ul>	<ul style="list-style-type: none"> <li>✓ <b>Digital Product Passport</b> - by default</li> <li>✓ <b>Substances of Concern</b> - by default</li> <li>✓ <b>Additional information</b> - as appropriate, e.g. on handling, recycling, to influence sustainable product choices</li> </ul>
<p><b>Horizontal requirements</b> covering several product groups with sufficient technical commonalities, to speed up the transition to a circular economy</p>	<p><i>In particular on durability and reparability (recital (13))</i></p>	<p><i>DPP and info on substances of concern not mandatory</i></p>

# Ecodesign requirements

## Substances of Concern



### Substances of concern definition (Art. 2(28)):

(a) Substances of Very High Concern (SVHCs) according to REACH Article 57 and included in the REACH Candidate List\*

(b) Substance with a harmonised classification in Annex VI (Part 3) of the CLP Regulation (EC) No 1272/2008 as follows:

<b>Human Health hazards</b>	<ul style="list-style-type: none"><li>Carcinogenicity categories 1 and 2 *</li><li>Germ cell mutagenicity categories 1 and 2 *</li><li>Reproductive toxicity categories 1 and 2 *</li><li>Endocrine disruption for human health categories 1 and 2</li><li>Respiratory sensitisation cat. 1 *</li><li>Skin sensitization cat. 1 *</li><li>Specific target organ toxicity – repeated exposure cat. 1 and 2 *</li><li>Specific target organ toxicity – single exposure cat. 1 and 2 *</li></ul>	<b>Environmental hazards</b>	<ul style="list-style-type: none"><li>Endocrine disruption for the environment categories 1 and 2</li><li>Persistent, Mobile and Toxic or Very Persistent, Very Mobile properties</li><li>Persistent, Bioaccumulative and Toxic or Very Persistent, Very Bioaccumulative properties</li><li>Chronic hazard to the aquatic environment cat. 1 to 4*</li><li>Hazardous to the ozone layer*</li><li>Substances regulated under Regulation (EU) No 2019/1021 on Persistent Organic Pollutants</li></ul>
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(c) Substance that negatively affect the re-use and recycling of materials in the product in which it is present\*\*

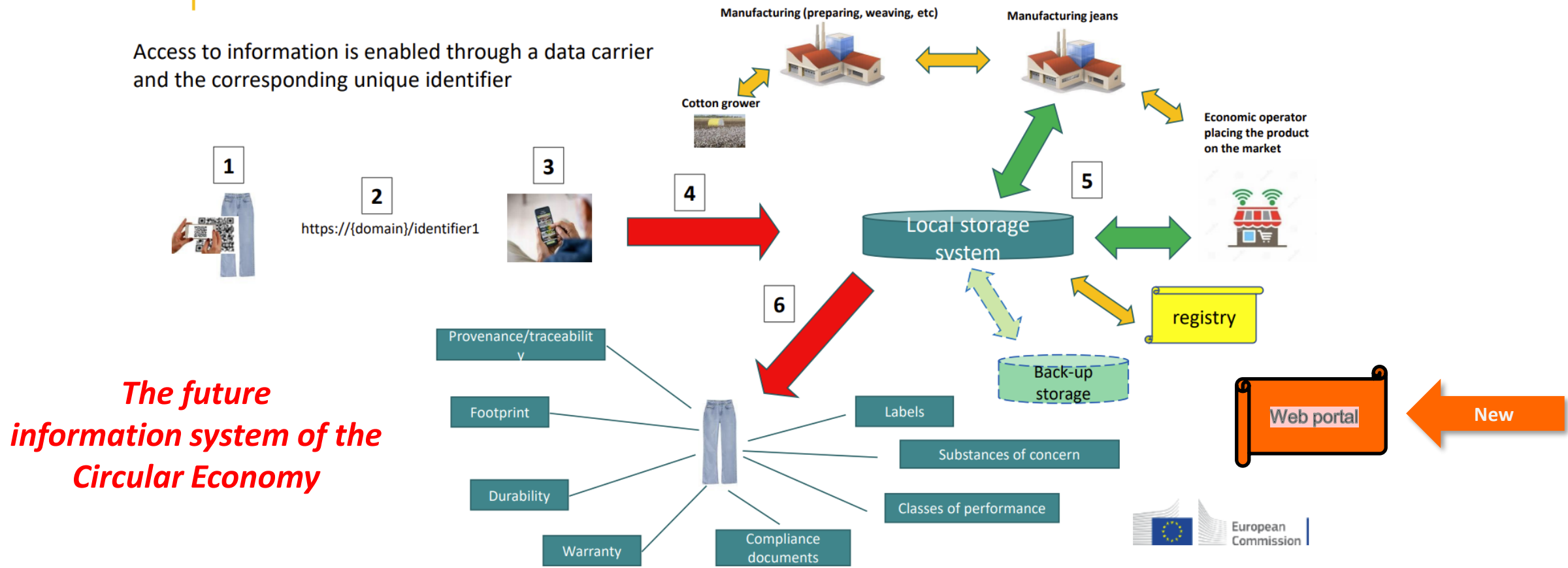
\* Considered to be **restricted in textiles to be regulated** according to JRC Preparatory Study, Initial Questionnaire (available [HERE](#))

\*\* For each product group concerned by ecodesign requirements, the Commission shall determine, where relevant, which substances fall under the definition in Article 2 (28), point (c) - see Article 5 (8a)

# Digital Product Passport (DPP)

## Electronic sharing of information on environmental sustainability

Access to information is enabled through a data carrier and the corresponding unique identifier



*The future information system of the Circular Economy*

Picture source: COM, <https://youtu.be/b3v0xYCjTII>

# Destruction of unsold consumer products

## Summary of requirements (Chapter VI)

1. **General principle to prevent destruction (Art. 19a)** to apply to **all** economic operators (regardless of their size)!
2. **Phase-in of the destruction ban (Art. 20a/b):**
  - Apparel and clothing accessories and footwear, see initial product list in [Annex VIIa](#)
  - COM delegated act after 1 year (~2025), incl. possible additions and exemptions
  - Large enterprises after 2 years (~2026), medium-sized enterprises after 6 years (~2030)
3. **Disclosure obligation on discarded unsold consumer products (Art. 20)**
  - COM implementing act after 1 year (~2025), incl. format, delimitation of product types / categories
  - Annually, first time after the 1<sup>st</sup> full financial year (~2026)
  - Initially for large enterprises, for medium-sized enterprises after 6 years (~2030)

Micro and Small enterprises exempted from 2.&3.



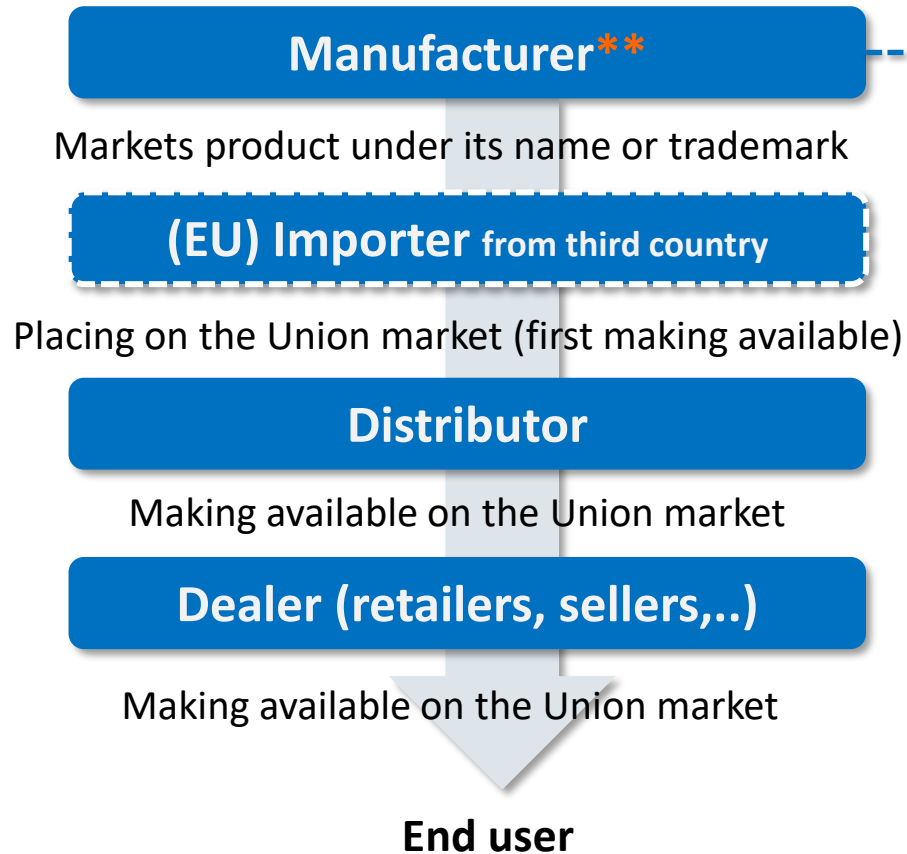
Thresholds (Article 2)			
Enterprise category	Headcount: annual work unit (AWU)	Annual turnover	Annual balance sheet total
Medium-sized	< 250	≤ EUR 50 million	≤ EUR 43 million
Small	< 50	≤ EUR 10 million	≤ EUR 10 million
Micro	< 10	≤ EUR 2 million	≤ EUR 2 million

Source: European Commission, User Guide to the SME Definition, 2020 ([link](#))

# Duty holders and enforcement

## Duty holders: Economic operators\*

\*\*'manufacturer' means any natural or legal person who **manufactures** a product or who has a product **designed or manufactured**, and markets that product under its name or trademark; - Art. 2(42)



### Compliance obligations are adapted to supply chain roles:

- **Manufacturers** are the principal duty holders, incl. conformity assessment and technical documentation, (single) EU declaration of conformity and CE marking (or alternative conformity marking, as specified)
- **EU authorised representative**: Limited mandate in relation to specific tasks, but at least reporting to competent national authorities
- **Importers**<sup>1</sup> to ensure product compliance before placing it on the market
- **Distributors**<sup>1</sup> shall act with due care in relation to ecodesign requirements
- **Dealers** to ensure (potential) customers' access to relevant information
- Specific aspects (e.g. labels, monitoring and reporting)

<sup>1</sup>Importers and Distributors may be treated like Manufacturers (Art. 28)!

\*See role definitions in ESPR Art. 2(39)-(46), (56) and Chapter VII – Obligations of economic operators (Art. 21–31) for the full details.

Additional roles/duties, e.g. *fulfilment service provider*, *independent operator* (Art. 2(46a)), *professional repairer* (Art. 2(46b)), *supply chain actors* (Art. 31a), *online marketplaces* and *online search engines* (Art. 29), *distance selling* (Art. 30). New: *DPP service provider* (Art. 2(32a))



# Duty holders and enforcement

## How will Enforcement look like and who will be in charge?

- Applicable provisions
  - Market Surveillance Regulation (EU) 2019/1020
  - Complemented by ESPR provisions
  - Penalties for non-compliance (Art. 68), incl. fines
- Key authorities / groups
  - **Market Surveillance Authorities**
  - **Customs Authorities**
  - **Administrative Cooperation Group ('ADCO')**
  - **European Commission**
- Additional enforcement tools
  - Commission Product Passport Registry (Art. 12)
  - Private enforcement (Recital 102(b), Art. 69a)

Consumer right to claim compensation for non-compliance damage from the product's manufacturer, EU importer or authorised representative, or fulfilment service provider



# European Commission preparatory work for textiles

## 1st ESPR working plan: Product groups to be prioritised\*

2b. *In the first working plan, [to be adopted no later than 9 months after the entry into force of this Regulation], the Commission shall prioritise the following product groups: - iron, steel - aluminium - textiles, notably garments and footwear - furniture, including mattresses - tyres - detergents - paints - lubricants - chemicals - energy related products, the implementing measures for which need to be revised or newly defined - ICT products and other electronics. If any of those product groups is not included in the working plan or if any other product group is included, the Commission shall provide a justification for its decision in the working plan.*

\*See [ESPR final text](#) Art. 16 2b.



 **Initial list of priority products for 2024-2027**

**“Textiles is one ESPR priority area, however, the exact scope of products is still to be determined after consultation with relevant stakeholders and conducting the necessary impact assessments.”\*\***

\*\*European Commission, Transition Pathway for the Textiles ecosystem, policy report published 6 June 2023, available [HERE](#)

# European Commission preparatory work for textiles

## Initiative "New product priorities for Ecodesign for Sustainable Products"

Table 8. Environmental assessment of the 12 end-use products shortlisted.

	WATER	AIR	SOIL	BIODIVERSITY	WASTE	CLIMATE CHANGE	ENERGY USE	HUMAN TOXICITY	MATERIAL EFFICIENCY	LIFETIME EXTENSION
<b>Score 43</b> TEXTILES and FOOTWEAR	5	2	4	4	5	5	5	3	5	5
<b>Score 30</b> FURNITURE	1	5	5	5	4	5	5	2	5	5
<b>Score 30</b> CERAMICS PRODUCTS	3	3	3	3	3	4	4	1	3	3
<b>Score 30</b> TYRES	3	4	3	3	3	3	3	2	3	3
<b>Score 28</b> DETERGENTS	4	2	1	4	3	3	3	2	3	3
<b>Score 26</b> BED MATTRESSES	1	3	1	2	5	3	3	2	3	3
<b>Score 24</b> LUBRICANTS	2	2	2	2	2	3	3	2	3	3
<b>Score 24</b> PAINTS	3	3	2	3	3	2	2	2	3	1
<b>Score 23</b> COSMETICS	4	2	1	4	3	2	1	2	3	1
<b>Score 22</b> TOYS	1	1	1	1	3	2	2	3	3	5
<b>Score 21</b> FISHING GEARS	4	1	1	4	3	2	1	1	3	1
<b>Score 18</b> ABSORBENT HYGIENE PRODUCTS	2	1	2	2	4	2	2	1	1	1

Box 10. Factsheet for Textiles and footwear

**TEXTILES AND FOOTWEAR**

**43** TEXTILE and FOOTWEAR

WATER 5 (EI, IP) AIR 2 (EI, IP) SOIL 4 (EI, IP) BIODIV 4 (EI, IP) WASTE 5 (EI, IP) CLIMATE CHANGE 5 (EI, IP) ENERGY CONSUM 5 (EI, IP) HUMAN TOXICITY 2 (EI, IP) MATERIAL EFFICIENCY 5 (IP) LIFETIME EXTENSION 5 (IP) STRATEGIC AUTONOMY 1

Scope: Apparel and home/interior textiles (e.g. bedlinen, towels, tablecloths, curtains etc.) consumed by households, and similar products consumed by government and business (e.g. uniforms and workwear used by all public and private sectors, bedlinen and towels etc. consumed by hotels, restaurants, healthcare services etc.) + footwear and technical textiles usually or also meant for consumers (such as truck covers, cleaning products) or specifically meant for industry (automotive, construction, medical, agriculture, etc) Excluded are: products for which textiles are not the dominant component (e.g. upholstery textiles, carpets mainly made of plastics, duvets, pillows) and leather.

### List of products included in the scope of the JRC Preparatory Study for Textile products (based on initial questionnaire available [HERE](#)):

**Nine apparel categories:** 01 T-shirts. 02 Shirts and blouses. 03 Sweaters and mid-layers. 04 Jackets and coats. 05 Pants and shorts. 06 Dresses, skirts and jumpsuits. 07 Leggings, stockings, tights and socks. 08 Underwear. 09 Swimwear. **Four categories of home/interior textiles:** 10 Bed linens. 11 Kitchen textiles. 12 Towels and bathrobes. 13 Textile cleaning products. 14 Reusable absorbent hygiene product

**Excluded from the scope are (for now):** *Technical textiles, sportswear*

Source: European Commission, JRC Science for Policy Report, Ecodesign for Sustainable Products Regulation – preliminary study on new product priorities, Technical Report (draft), 2023, available [HERE](#).

# European Commission preparatory work for textiles

## JRC Preparatory Study for Textile products

Information available at <https://susproc.jrc.ec.europa.eu/product-bureau/product-groups/467/project-plan>



European Product Bureau

<https://susproc.jrc.ec.europa.eu/product-bureau>

Milestone	Topic addressed	Date
Initial questionnaire	Definitions, Scope, Market analysis, User Behaviour, Ecodesign aspects, EU Ecolabel, EU Green Public Procurement	30 March 2023 – 8 May 2023
1 <sup>st</sup> milestone	Scope, Market, Current EU Ecolabel criteria, Current EU Green Public Procurement criteria, User behaviour	To be communicated
2 <sup>nd</sup> milestone	Topics to be communicated after finalization of the 1 <sup>st</sup> milestone	To be communicated
3 <sup>rd</sup> milestone	Topics to be communicated after finalization of the 2 <sup>nd</sup> milestone	To be communicated

The following link allows the registration as stakeholder and participation in the project milestones set out above:

<https://susproc.jrc.ec.europa.eu/product-bureau//contact/register>



# ESPR & Impact for Textiles

## Outlook on next steps



Step	Schedule parameters	Time estimate
JRC Preparatory Study for Textiles	<i>1st milestone</i> to be reached	February 2024?
Revision of JRC Study on New Product Priorities (2023) to be updated (finalized)	JRC and COM workload	Publication in early 2024?
Formal adoption of ESPR	Procedure to finalise legislation	Expected by end of Q1/2024 (?)
ESPR Entry into Force (EiF)	20th day following publication	By April 2024?
ESPR Implementation Strategy by COM	2024 European elections, new Commission by autumn	To be confirmed
Adoption of 1st ESPR working plan for 2024-27	No later than 9 months after EiF	~January 2025
1st ESPR Delegated Act (DA)	At the earliest 1 year after EiF	~Q2/2025-
Application of (1st) DA	18-month minimum period	~Q4/2026-

# ESPR & Impact for Textiles

## How companies can prepare?

- ✓ Familiarise yourself with the requirements (as per final text)
- ✓ Assess impact, incl. your role(s) under ESPR
- ✓ Monitor ESPR adoption and preparatory work for textiles
- ✓ Join/participate as a stakeholder for the preparation of ecodesign requirements and DPP
- ✓ Get prepared for the provisions to prevent the need to destroy unsold consumer products
- ✓ Raise awareness on ESPR and the broader sustainability agenda: within your company; in your supply / value chain
- ✓ If available, turn to your sector association for help



### **References for further information:**

- ESPR final text (according to provisional agreement): [HERE](#)
- JRC Preparatory Study on textiles for product policy instruments – the initial questionnaire: [HERE](#)
- ESPR – Game-changer or Slow Burner?, article in Zeitschrift für StoffR: [HERE](#)

### ESPR support services

- Stakeholder consultation support
- ESPR impact analysis and monitoring
- Training & awareness raising for industry associations and upstream suppliers
- Other consulting support

***Note: Our services bring together our regulatory expertise and your product know-how, guiding you through the ESPR requirements and processes and helping you take the appropriate actions.***





**Thank you for your attention!**

**REACHLaw Ltd, Aleksanterinkatu 19, FI-00100 Helsinki, FINLAND. [www.reachlaw.fi](http://www.reachlaw.fi)  
Tim Becker, Senior Legal Advisor, [tim.becker@reachlaw.fi](mailto:tim.becker@reachlaw.fi), +358 40 773 8143**



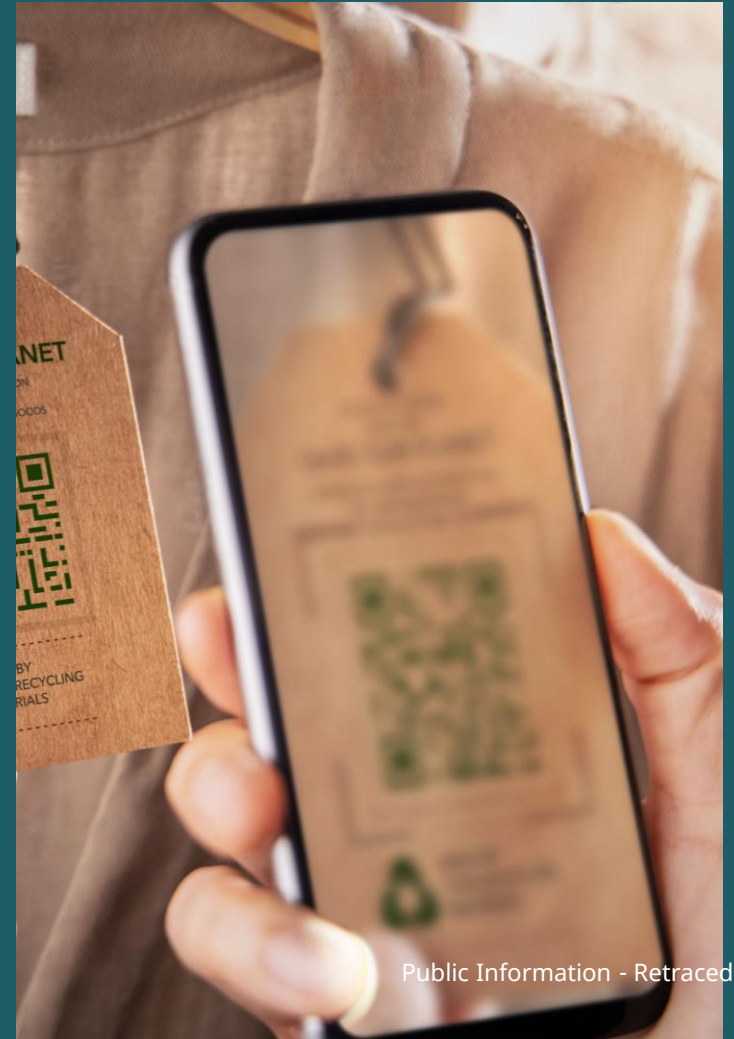
***END OF PRESENTATION***

# Ecodesign for sustainable products regulation



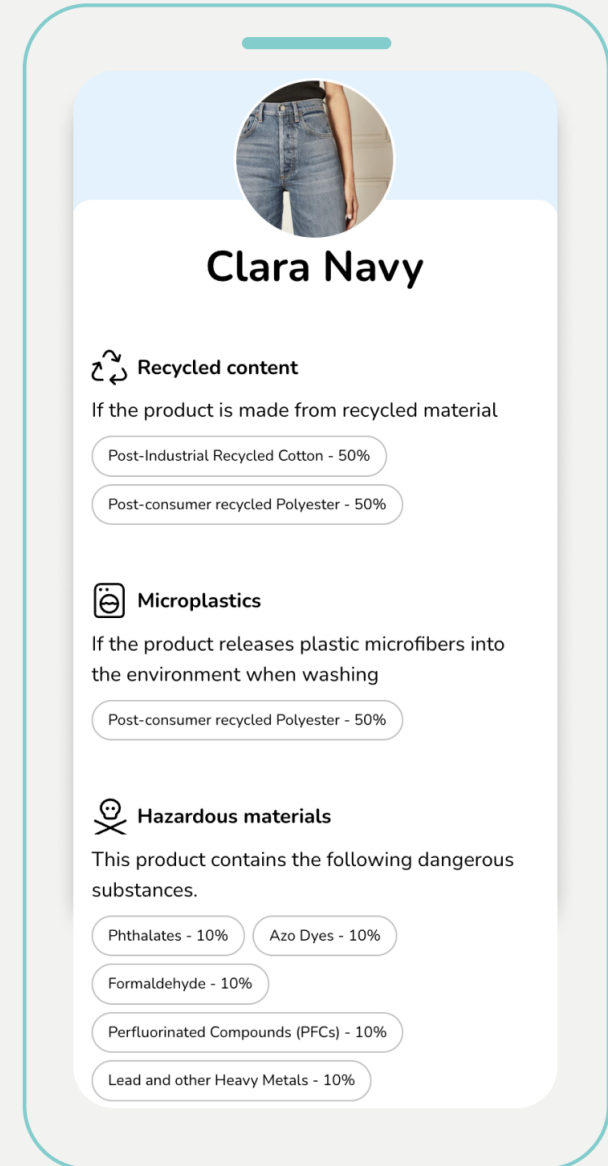
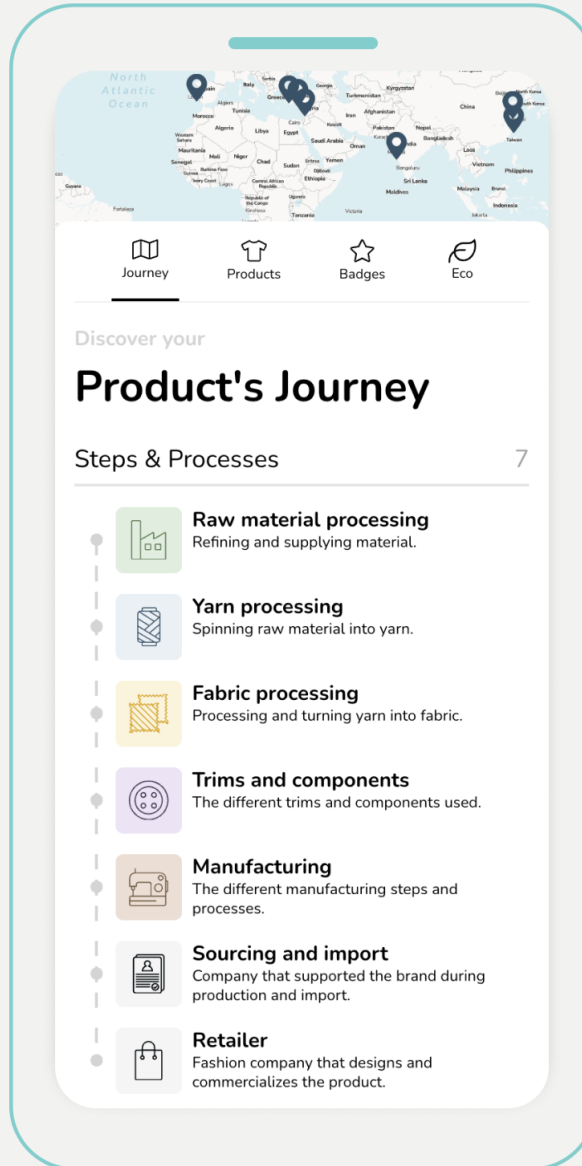
# 01

## Digital Product Passport



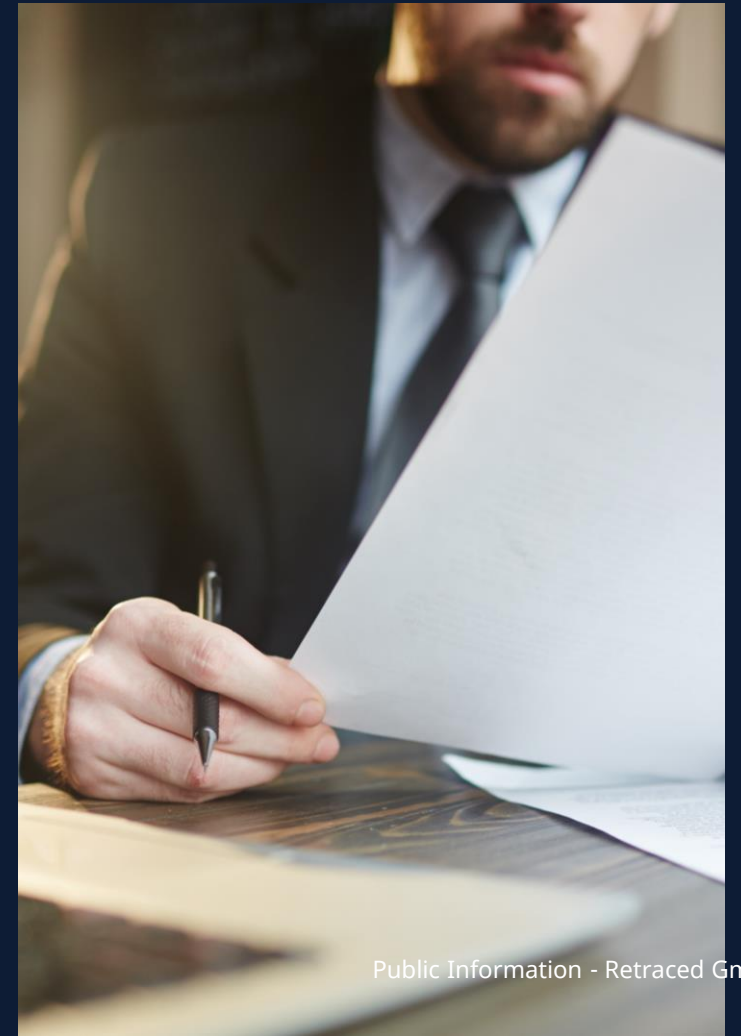
WHAT IS A DPP

# Digital Product Passport



# 02

## European Legislations



# Where do we stand

The road towards a European Digital Product Passport.



## European Green Deal

On 19 December 2019, the EC adopted the proposal of the European Green Deal.

Goal to reach climate neutrality by 2050. EU transformation into a fair and prosperous society with a modern and competitive economy with policy initiatives.



## EcoDesign for sustainable Products Regulation

On 30 March 2022, EC adopted a proposal for a regulation framework for setting Ecodesign requirements for sustainable products.

Goal to improve their circularity, energy performance, and other environmental sustainability aspects of all product groups.



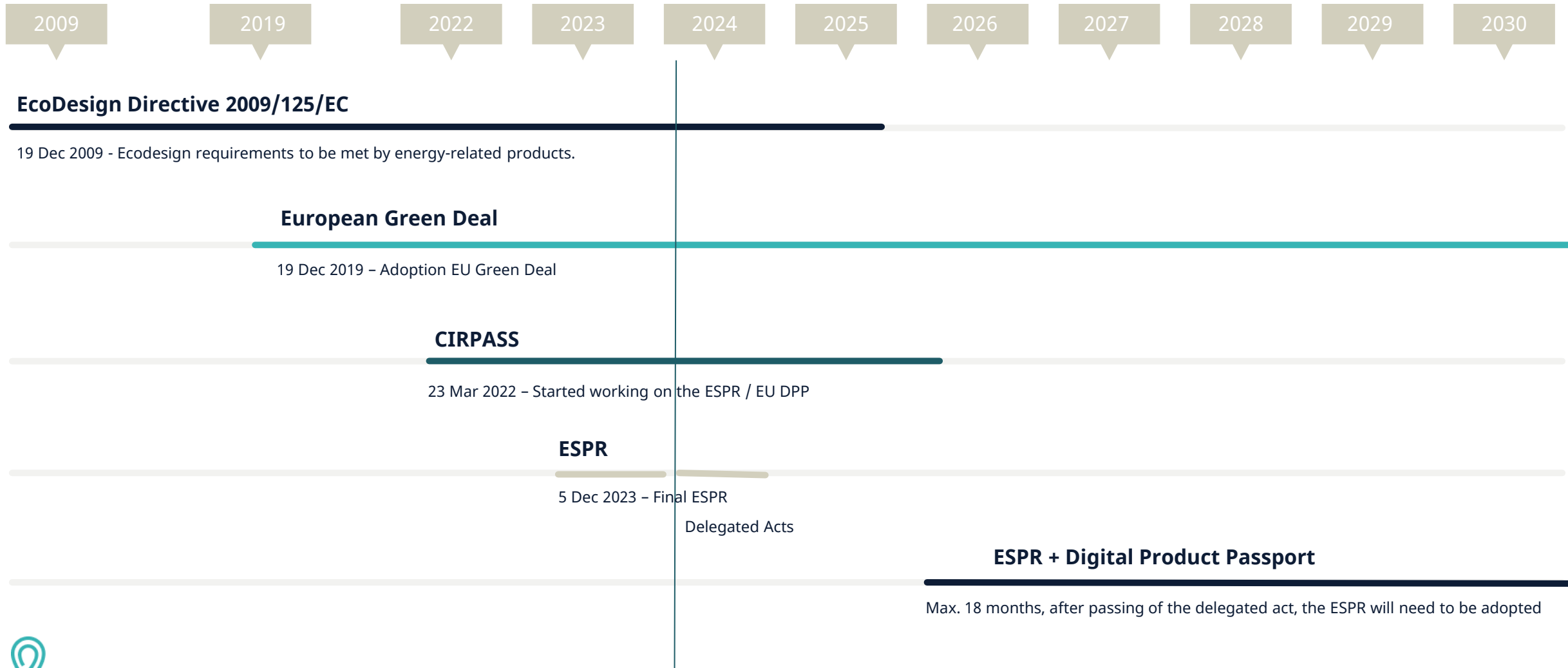
## EU Digital Product Passport

One aspect of the ESPR is the creation of an EU DPP that supports new business models.

Goal to transition to a circular economy by providing relevant information to downstream industry stakeholders.



# EU Development Timeline



WHAT DO WE KNOW

# ESPR - DPP

It is the regulation responsible for the implementation of the **Digital Product Passport** setting the framework for the content.

It will be firstly applicable to **Energy, Batteries and Fashion and Textile Sector** (1).

Clearly defines today which type of information will need to be attached to a product: **Sustainability, circularity, value retention** for re-use, **remanufacturing** and **recycling**.

ESPR will require to collect a various amount of **data from the upstream supply chain network**.

Data will need to be attached **in form of a data carrier** (e.g. QR code, RFID).

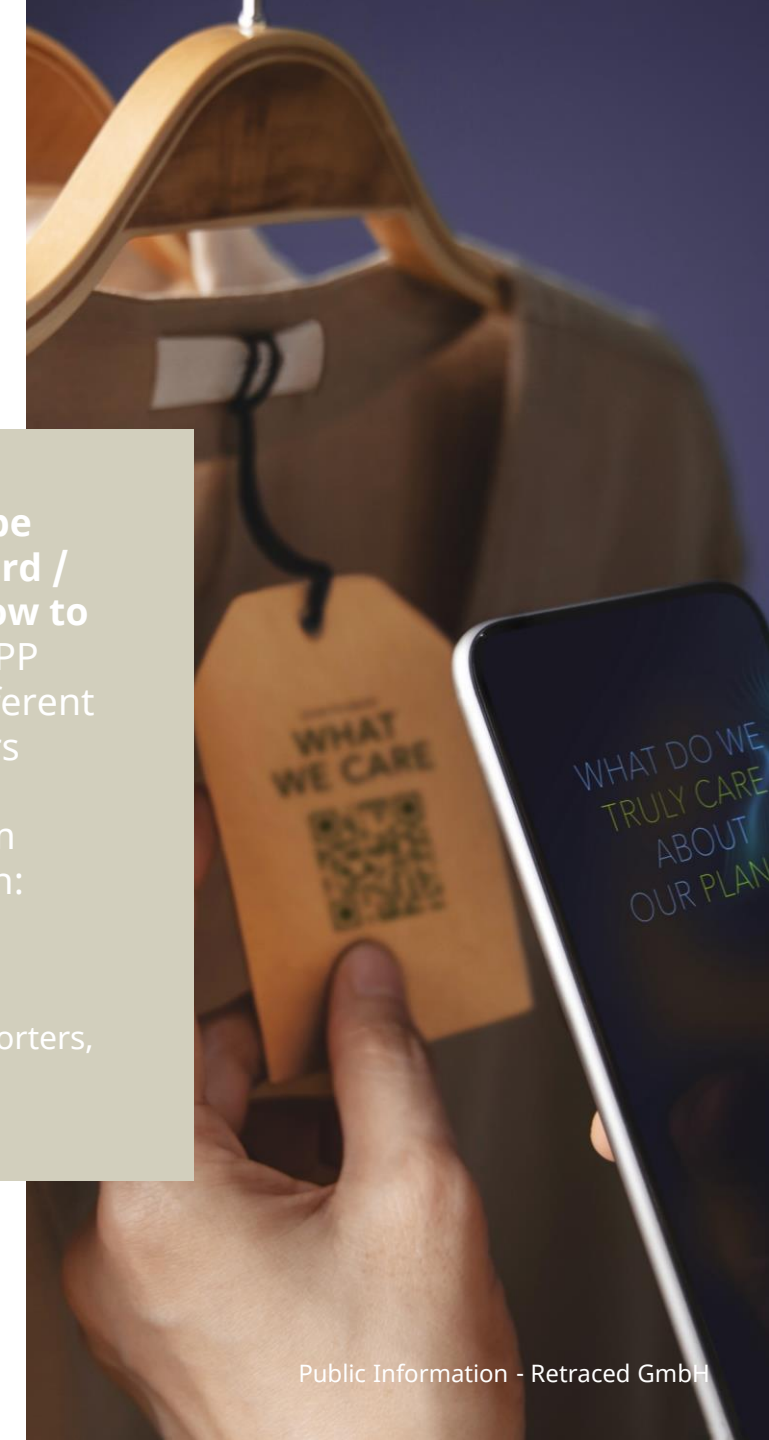
ESPR and DPP lies in the responsibility of **manufactures, brands and retailers** to enable circular downstream business models.

There will be **one standard / protocol** how to **read-out** DPP data for different stakeholders from the downstream supply chain:

e.g. End-consumers, businesses (Sorters, Recyclers)



Source (1): [JRC Science for Policy report: Ecodesign for Sustainable Products - preliminary study on product priorities](#)  
Source: [Products fit for the green transition: Council and Parliament conclude a provisional agreement on the Ecodesign regulation](#)





# ESPR - DPP

**What data in what format** exactly will need to be collected to meet the ESPR within the DPP for individual stakeholders. *End-consumers vs. downstream business (Recyclers, Sorters...)*

**Potential Track and Trace Identifiers**,  
*e.g. Registered Trade names, GTIN, GLN.*

**Interoperability** (Technical, Semantic, Organizations).

**Potential Attributes** of the information:

- Description of materials, components, products
- Recycled Content
- Substances of concerns
- Environmental Footprint Profile
- Classes of performance
- Technical parameters

**Data storage**, processing, authentication, security and privacy.

**Access rights** to which data on the DPP.

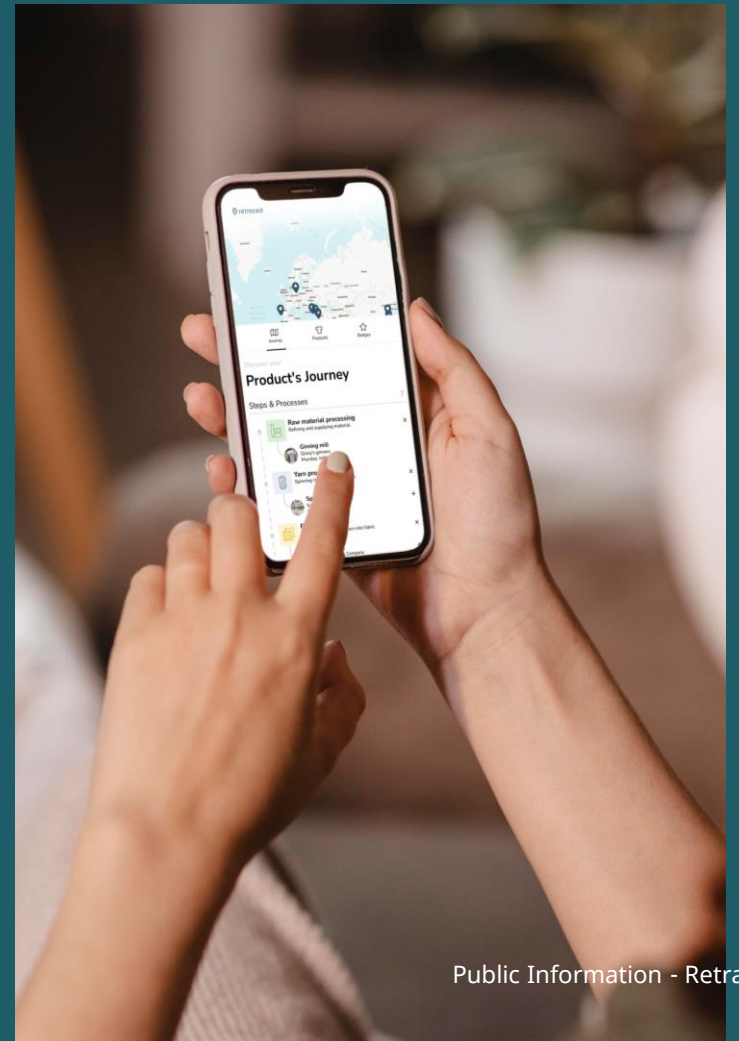
**When** exactly will companies be obliged to implement a DPP in their operations?

*“Getting ready for the unknown and making change takes time and will require resources from a multitude of stakeholders along all value chain levels.”*



# 03

## Data



WHY DO WE NEED DATA

# 16 EU Legislations forcing us to collect data



## European Green Deal

EcoDesign and Digital  
Product Passport

National Tax on Waste

Waste Shipment

Green Claims and Textile  
Labelling

Green Public  
Procurement (GPP)

Waste Legislation

Corporate Sustainability  
Due Dilligence

Corporate Sustainability  
Reporting Directive

Industrial Emissions

Sustainable Finance  
(Taxonomy)

Microplastic

PFAS Restriction

Skin Sensitizers

Bisphenol

Reach Revisions

PFHxA Revision

# ESPR - DPP

What information will we need to collect data about?

01  
Durability

02  
Reliability

03  
Reusability

04  
Upgradability

05  
Reparability

06  
Possibility of maintenance and refurbishment

07  
Presence of substances of concern

08  
Energy use and energy efficiency

09  
Water use and water efficiency

10  
Resource use and resource efficiency

11  
Recycled content

12  
Possibility of remanufacturing

13  
Possibility of recycling

14  
Possibility of recovery of materials

15  
Environmental impacts, including carbon and environmental footprint

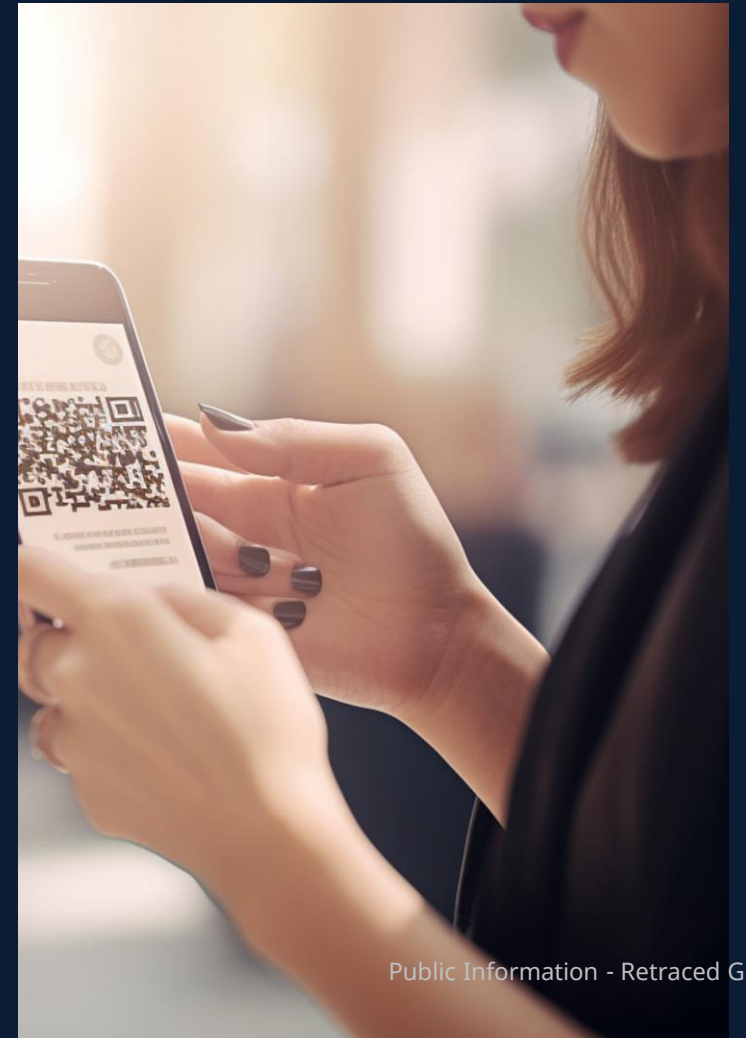
16  
Expected generation of waste





# 04

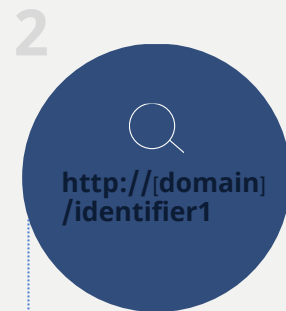
## Standardization and Systems



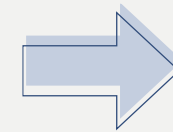
# Technical infrastructure Landscape

## DPP Landscape

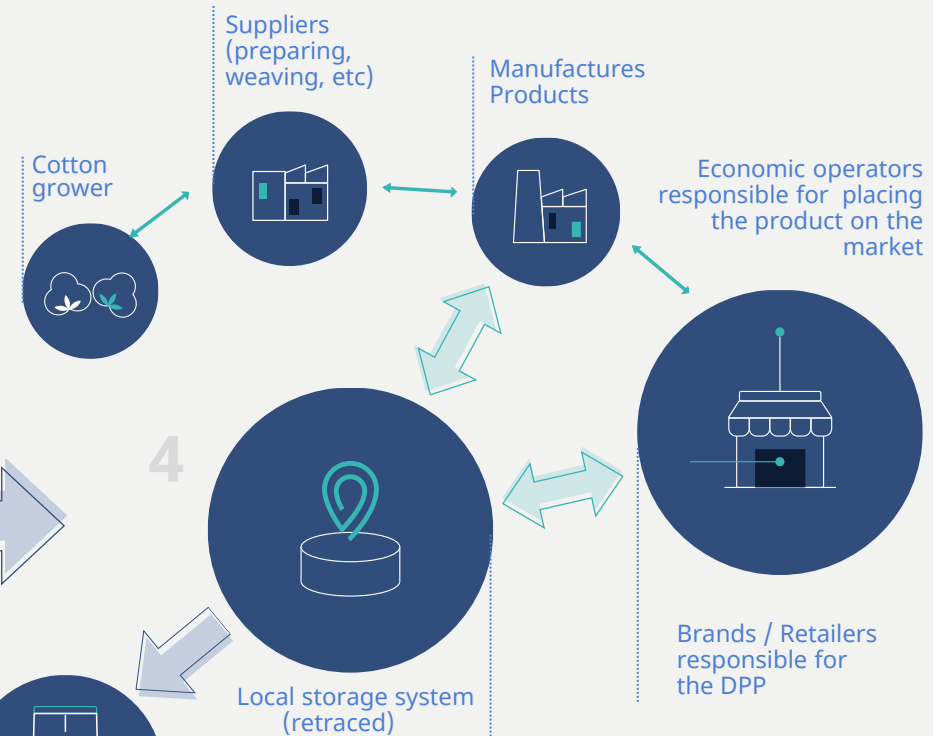
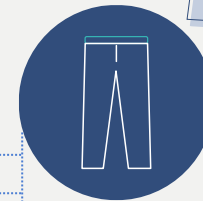
Access to information is enabled through a data carrier and the corresponding unique identifier.



**Digital twin**  
Data requests will be on item level



- Provenance / traceability
- Footprint
- Durability
- Warranty
- Compliance documents
- Substances of concern
- Labels
- Classes of performance



## // Article (30)


Technical specifications and requirements related to traceability across the value chain should, in order to allow for their effective implementation, to the extent possible be developed based on a consensual approach and on the involvement, buy-in, and effective collaboration of a diverse set of actors, including standardization bodies, industry associations, start-ups, consumer organizations, experts, NGOs and international partners, including developing economies.



**Thank you.**

**Contact:**  
[info@retraced.com](mailto:info@retraced.com)





# BUREAU 555

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Gabrielle Shiner-Hill  
Co-founder

\*digitally rendered fabric

Virtual fabric sampling,  
a tool with the potential  
to significantly reduce  
the fashion industry's  
carbon footprint

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# SPECIALISTS IN 3D FABRIC DIGITISATION

Making digital technologies **accessible** throughout the supply chain for brands, manufacturers and mills working towards a more **sustainable & resilient** future

Founded in 2022 by Nusrat Mahmud Director of Hamid Fabrics Ltd & Gabrielle Shiner-Hill

**Material first** company focussing on the people behind the technology

Focussing on **high-quality** digital materials

Moving the industry towards **net zero**

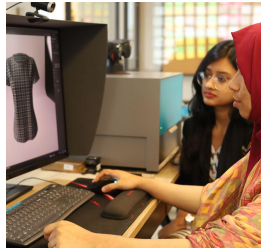
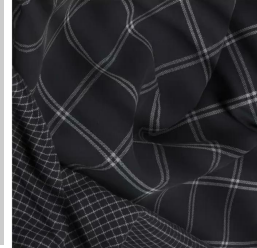
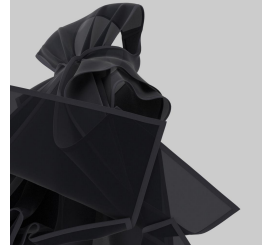
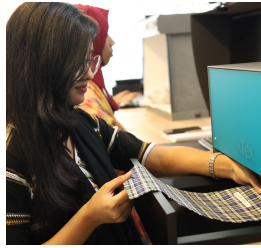


Image credit: Bureau 555

# IMPACT

**3500+**  
Virtual  
Fabrics  
Created

**1.5 million KG of CO2 | approx |**

**Saved:**  
**105,000**  
yards of  
textiles

**Equivalent to the CO2**  
emissions of driving 10.5  
million kilometers or 407 times  
around the world.



\*digitally rendered fabric



# EDUCATION & ACCESSIBILITY



**ual:** fashion, textiles and technology institute

**V&A**

 **Ravensbourne**  
University London

 **ARTS UNIVERSITY**  
BOURNEMOUTH

**alvanon** 

 **বৃহত্ত**  
BRIHATTA art foundation



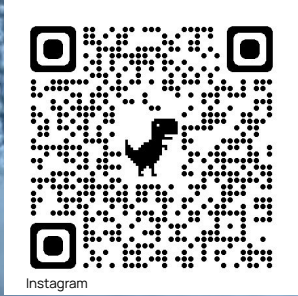




 **ULAB**  
UNIVERSITY OF LIBERAL ARTS  
BANGLADESH







Thank You

