



Design, Data & Responsibility:

Navigating the New Era of Textile Regulation

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Packaging

(e.g., plastic bag, cardboard, etc.)

Batteries

(e.g., integrated rechargeable batteries)



WEEE / Electronics

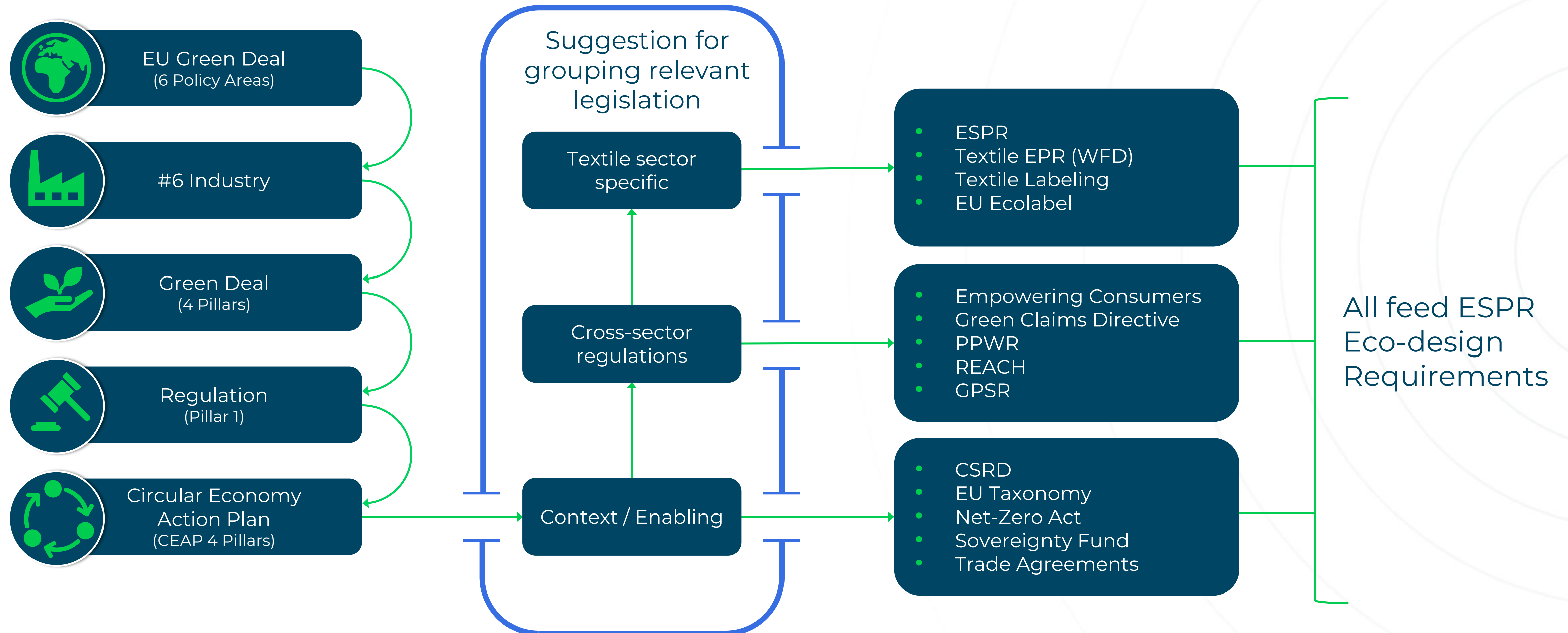
(e.g., heating elements, control unit)

Textiles

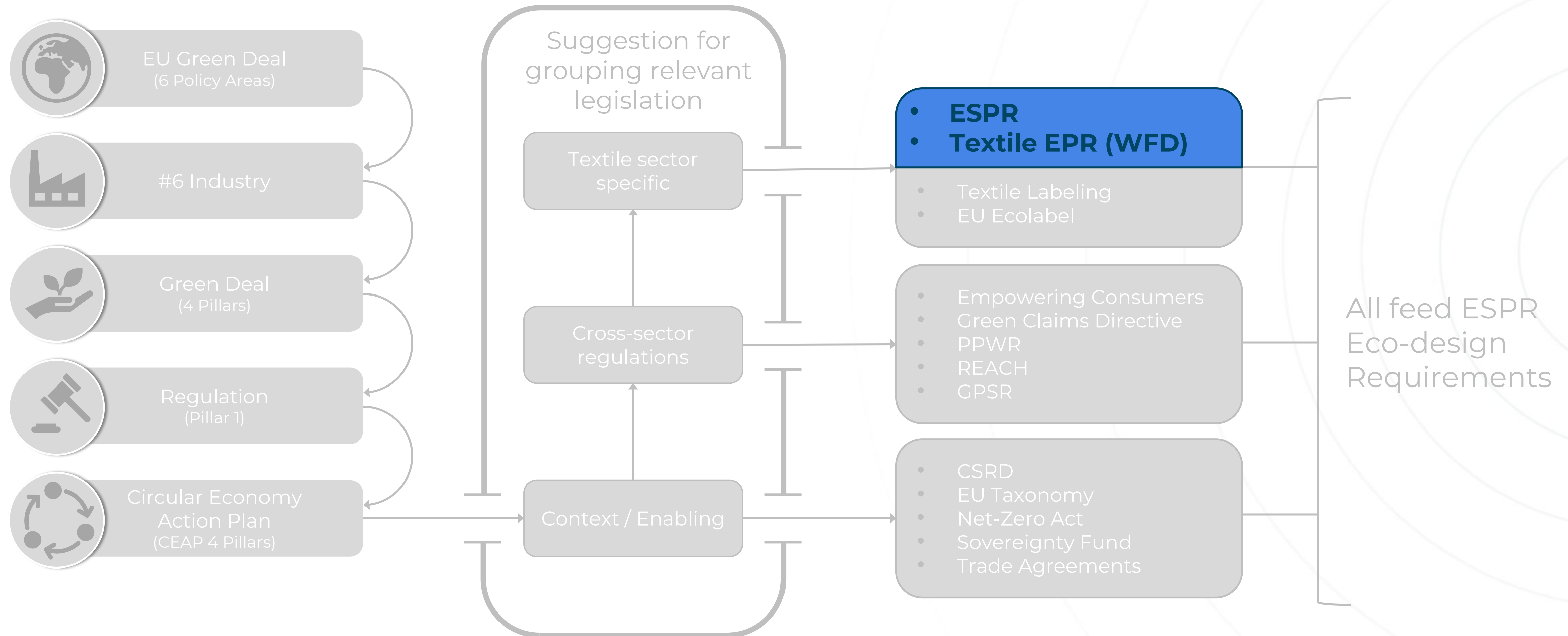
(e.g., fiber composition reporting of outer shell)

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EU Legislation Impacting the Textile Sector



EU Legislation Impacting the Textile Sector



Ecodesign for Sustainable Products Regulation

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Ecodesign for Sustainable Products Regulation (ESPR)

What is ESPR? The EU's framework regulation that sets sustainability requirements for products placed on the EU market



The framework

- Applies to **almost all physical products** placed on the EU market, wherever they are made
- Enables **durability, repairability**, and **recyclability**
- Supports **climate, competitiveness**, and **consumer goals**



One market, one rulebook

- **One set of rules** across a single market
- Directly applicable in **all Member States** — no national transposition
- Scales across **~450 million consumers**
- Delivers **predictability** for investment and innovation
- **Avoids fragmented** national patchworks



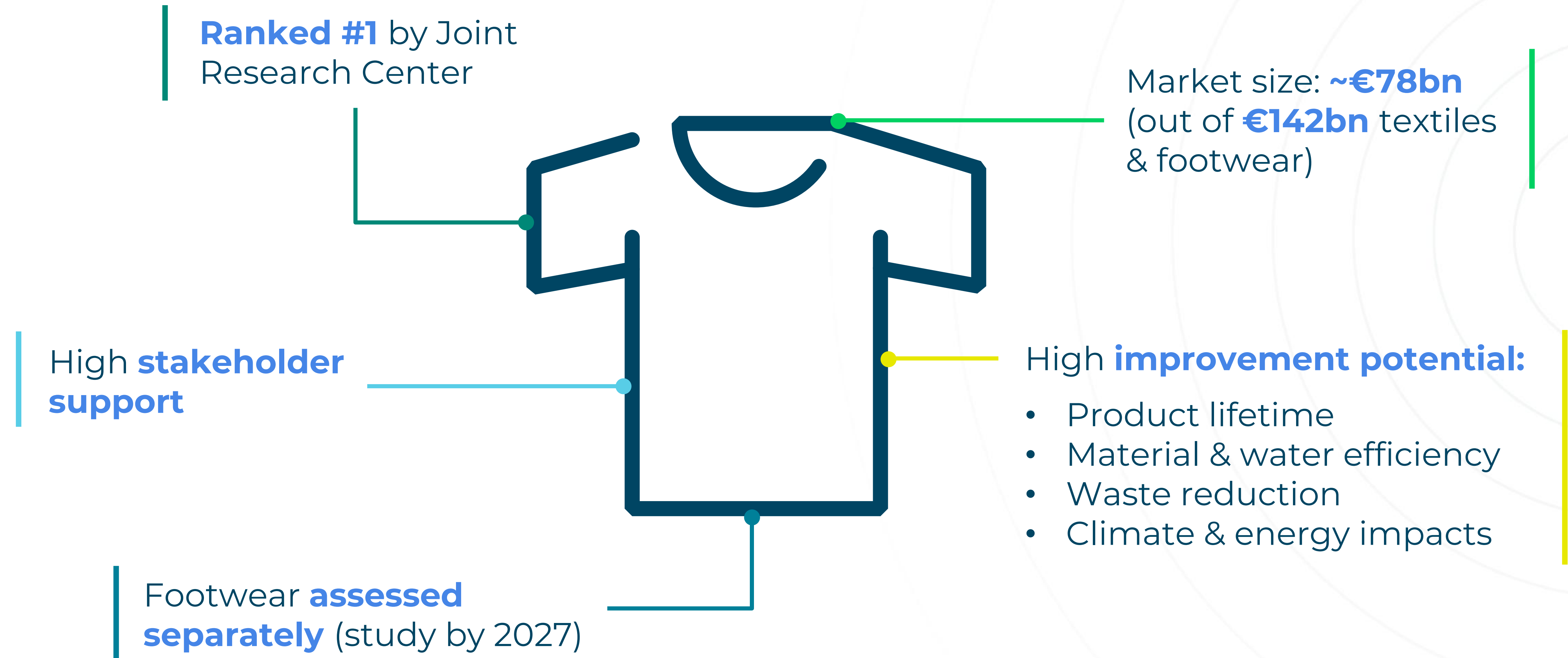
Policy goals

A **cornerstone of EU industrial & sustainability policy** (Circular economy, Decarbonization, Competitiveness & resilience, Consumer protection, Clean industrial growth)

ESPR Overview - How **Products Are Prioritised**



Textiles Are a **Priority Product** and **Fully in Scope**



ESPR as a **Framework Legislation**

How ESPR works



ESPR sets **objectives** & **principles**



No product-specific rules
in the Regulation itself



Technical **details set later**
via delegated acts

Making the Rules work



Stronger planning & coordination



Digital enforcement tools (ICSMS, DPP)



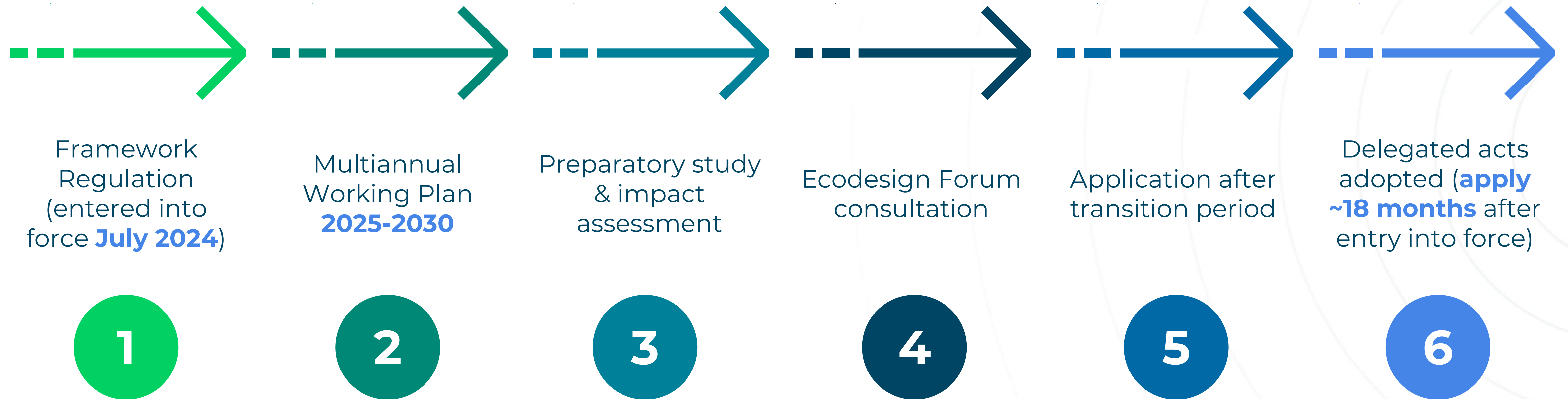
Focus on online & non-EU sellers



Joint EU actions & funding

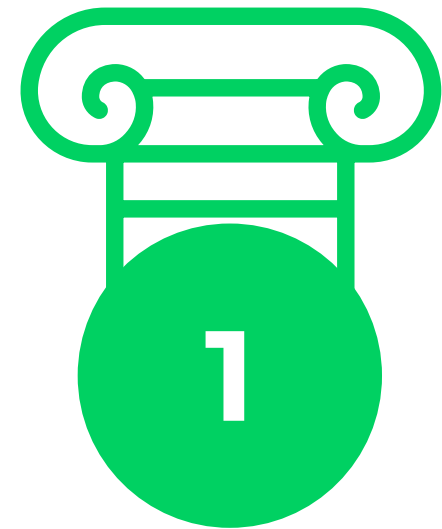
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ESPR **Process**



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ESPR Key Pillars



Eco-design requirements

Design for longevity & circularity: durability, reparability, maintenance, and recyclability of textiles

Boost sustainability: increase recycled content, reduce waste, energy, and resource use

Transparency & compliance: clear info on materials, environmental footprint, and substances affecting circularity



Ban on destruction of unsold products

First EU measure targeting waste in the fashion sector

Mandatory reporting for brands and retailers: disclose volumes, weight, and reasons for unsold products

Goal for the textile industry: reduce waste, boost circularity, and incentivize sustainable design and production



Digital Product Passports (DPP)

Digital identity for textiles tracking materials, repair, and recyclability

Boosts **circularity & sustainability**

Makes **lifecycle impacts** and **reuse potential** visible

Supports compliance & verification: accessible to brands, authorities, and customs



Green Public Procurement

EU public authorities spend **€1.8T/year on goods and services**, including textiles

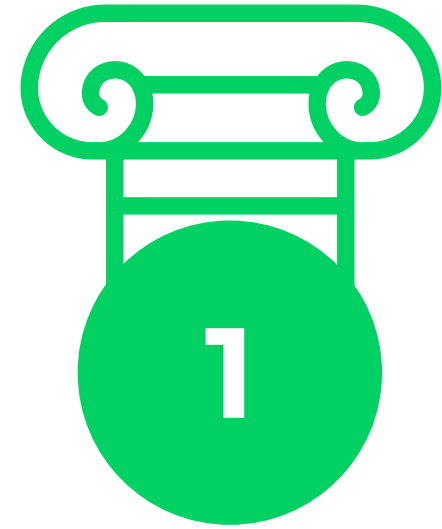
ESPR enables Green Public Procurement for textile products meeting top sustainability and circularity standards

Boosts market demand for sustainable textiles and incentivizes brands to invest in circular design and recycling

Today's Focus

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ESPR Key Pillars

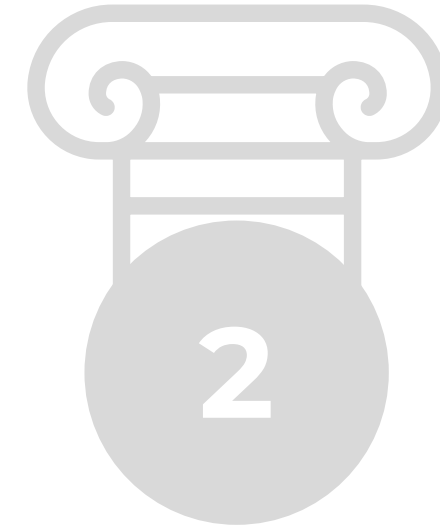


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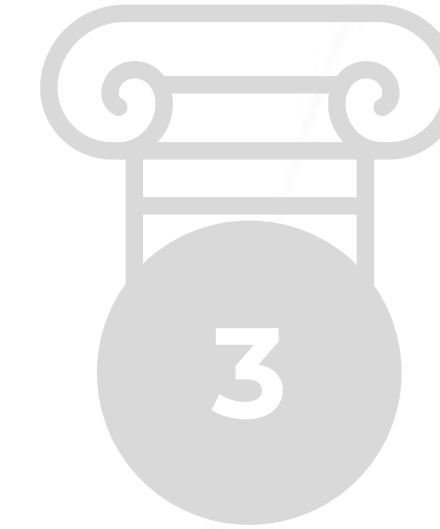


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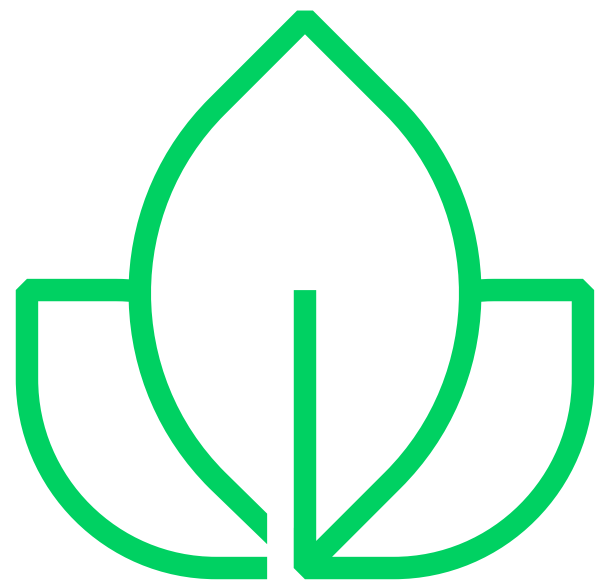
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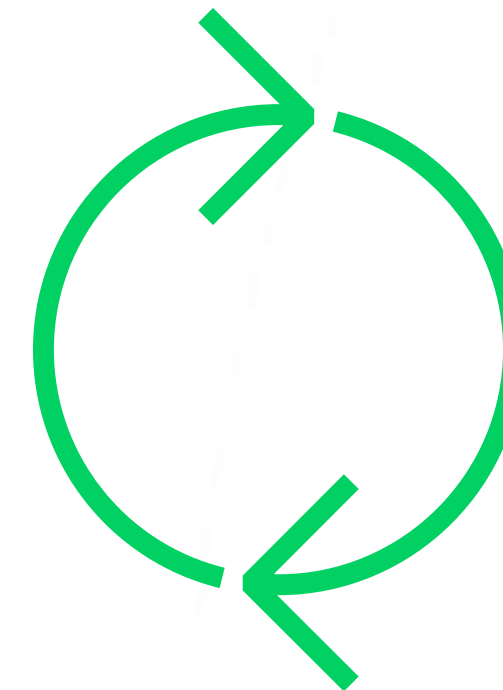
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Eco-design Potential Criteria



Environmental Criteria

- Recycled content
- Water and resource efficiency
- Waste generation
- Energy use
- Environmental footprint
- Managing substances of concern



Circularity Criteria

- Durability and reliability
- Reusability and upgradability
- Repairability and maintenance
- Refurbishment and remanufacturing
- Recyclability and material recovery

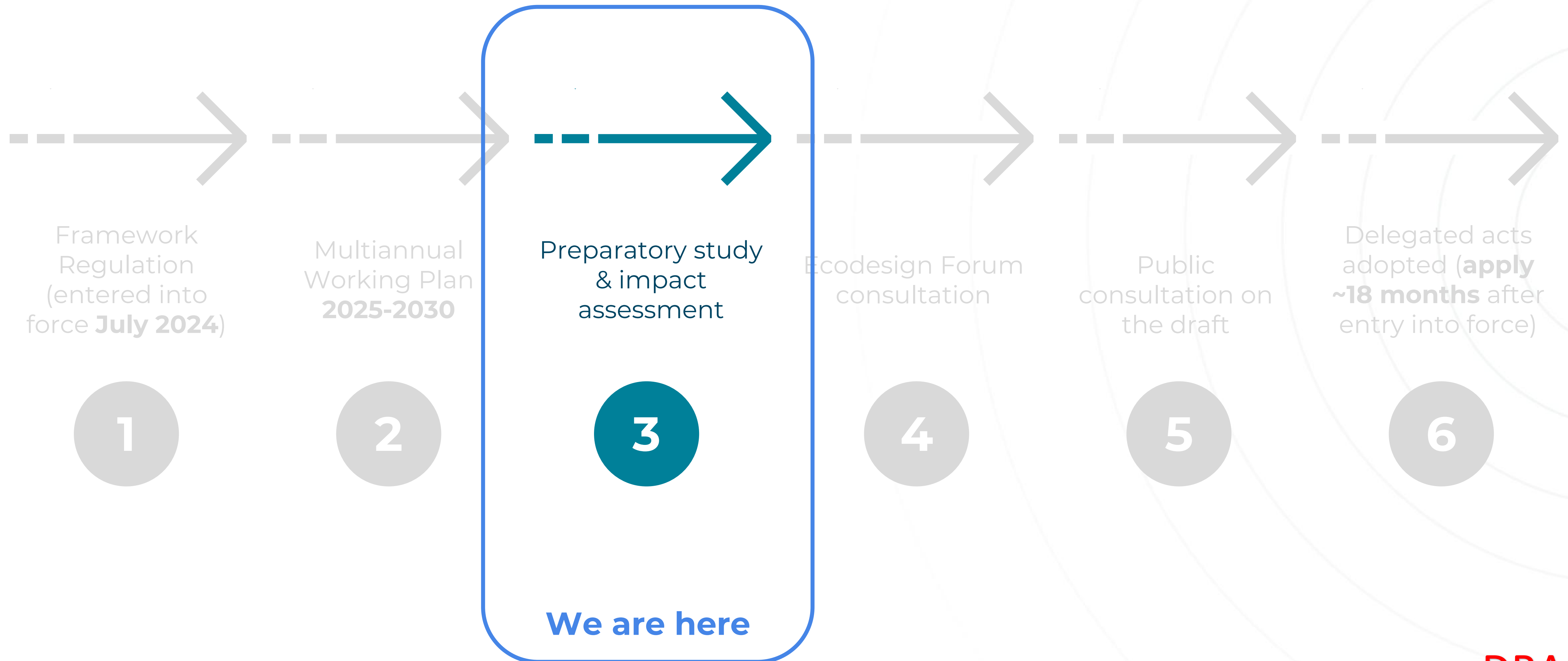
Criteria for each product to be defined through **Delegated Acts**



- **Product-specific:** Not all criteria apply to every product; relevance is assessed case by case
- **Evidence-based:** Preliminary studies and impact assessments determine which criteria are set, with stakeholder involvement built into the process
- **Made binding:** Selected criteria feed into delegated acts that set requirements per product group

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ESPR Process: **Preparatory Study**



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Joint Research Centre Preparatory Study – 3rd Milestone

It supports:



Future eco-design requirements via an ESPR delegated act



Possible mandatory EU Green Public Procurement (GPP) criteria



Future EU Ecolabel revisions, aligned with ESPR

Market reality

- Consumption mainly in EU & North America
- Production largely in Asia
- Fibers dominated by cotton & polyester
- Global, fragmented value chains (≈15 actors per product)

Scope

- Wide range of apparel categories
- At least 80% textiles by weight

Methodology

- Market & user behavior analysis
- Available and emerging technologies
- Environmental & economic lifecycle analysis (PEF, LCC, sLCC)
- Assessment of design options (information + performance-based)
- Excluded at this stage: full policy scenarios and macro-economic impacts

Joint Research Centre Preparatory Study – 3rd Milestone

Key Findings – Impact Hotspots & Design Constraints



60–63% of textile environmental impacts come from raw materials and fiber production



Main footprint drivers: water use, climate change, fossil resource use



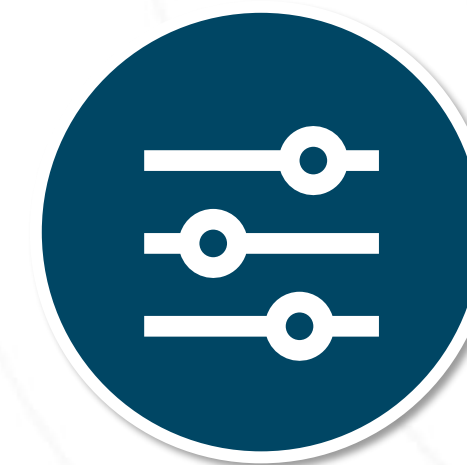
Design options are grounded in measurable product technologies



20–30% from manufacturing and finishing



Fiber cannot be ranked as “good” or “bad” — impacts vary by production method, location, and use



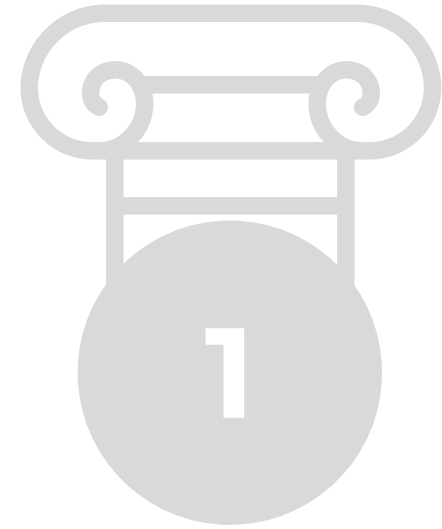
Most options are information-based, because few textile parameters can be turned into enforceable limits

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What the Textile Delegated Act is Expected to Cover?

REQUIREMENT AREA	EXPECTED OBLIGATION	BASIS
Durability	Minimum pilling resistance, tensile strength, and colorfastness standards by product type	ESPR preparatory study 2023
Recycled content	Minimum recycled fiber content percentage (likely 20–30% for synthetic fibers)	EU Circular Economy Action Plan
Chemical use	Prohibition or restriction of REACH substances of concern in production and finishing	ESPR Annex III; REACH Regulation
Microfiber release	Maximum microfiber release limits during washing (synthetic textiles)	ESPR preparatory study 2023
Repairability	Availability of repair instructions and, for certain categories, spare parts (buttons, zippers)	ESPR Article 5
End-of-life	Recyclability design criteria; disassembly instructions for composite products	ESPR Annex III
Digital Product Passport	Mandatory DPP for every textile product placed on the EU market	ESPR Article 9
Labelling	Updated fiber composition labelling aligned with DPP data	EU Textile Regulation 1007/2011 (to be amended)

ESPR **Key Pillars**



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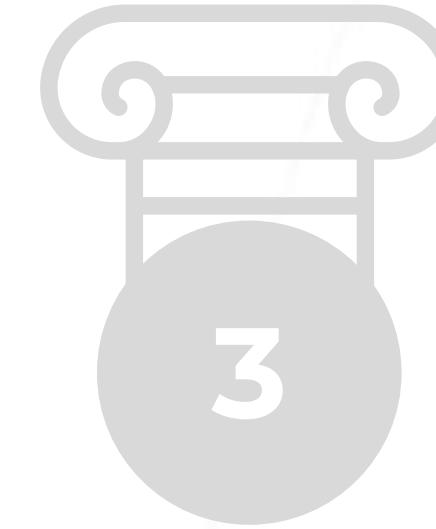


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Ban on the Destruction of Unsold Goods

What is Destruction under ESPR?

- Discarding/damaging products
- Recycling via shredding/dismantling
- Incineration or landfill
- Destroying unused products
- Willingly disposing of consumer goods pre-use
- Key exception: refurbishment/remanufacturing

Why the ban?

- 4–9% of textiles are destroyed annually
- One-third are online returns
- One-fifth is unsold inventory

Term	Product Type	Description
Unsold	Returns	Sold but have been returned by the customer to the retailer under their right to return
	Overstock	Never been sold. These products come straight from the production line
	Obsolete	There is no longer any demand
	Damaged	Damaged in transit or storage
	Recalled/ defective	Taken off the market due to a defect or quality issues

Legal Requirements

(25)

Obligated enterprises:

- Large enterprises: From 19 July 2026
- Medium-sized enterprises: From 19 July 2030

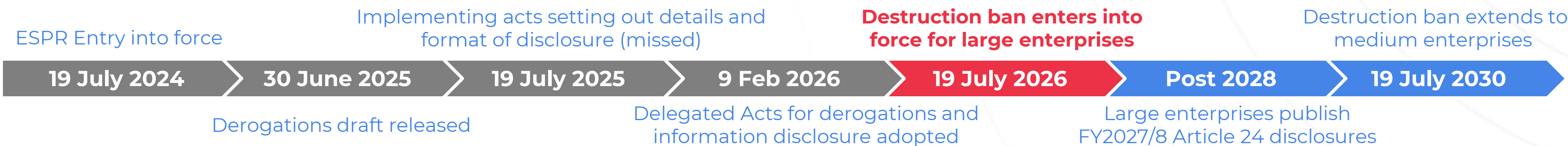
Scope (Annex VII):

- Defined by Commodity Codes
- Includes: Apparel, clothing accessories, and footwear

Exemptions:

- Micro and small enterprises
- Delegated act from 9th of February 2026 outlines 10 derogations (Article 2):
 1. Dangerous product (GPSR)
 2. Non-compliant with Union or national law (Other than GPSR)
 3. Breach of Intellectual Property
 4. Involve expired licenses or contracts
 5. Unsuitable for reuse or remanufacturing
 6. Unacceptable for consumer use due to hygiene & safety reasons
 7. Unfit due to design & manufacturing defects
 8. Offered for donation but not accepted, not found
 9. Social economy entity couldn't find a recipient
 10. Already prepared as reused products, but no recipient found

Timeline:



Annual Information **Disclosure**

What?



Report data to include
(Article 24 & Annex 1 in DA)

- Product category through **CN codes**
- Number and weight,
- Reason for discarding,
- Track % prepared for reuse, recycling, other recovery, disposal & Prevention plans

Who?



- **Textile waste:** sent to municipal centers or compliance schemes
- Sorted for reuse/recycling per **CORIT guidance**
- Supports **national recycling targets**

Ban on the Destruction of Unsold Goods

Annual Disclosure



Report data to include (Article 24 & Annex 1 in DA)

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Large enterprises

- Report data of the first full financial year after the regulation entered into force (July 2024)
- Standardized format
- Large enterprise to report first within 12 months after the **full** financial year
 - If FY Jan-Dec 2028, reporting in the standardized format, latest in January 2030

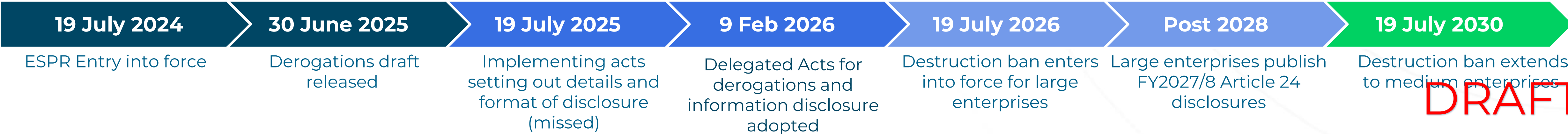
Medium-sized enterprises

- Enter into force from 2030

Annex 1 in the Delegated Act of Disclosure of Information

Identifier of the legal entity ^{b)}										
Type of identifier			☐ EUID ☐ Other, namely:							
Type of disclosure ^{c)}			☐ Standalone disclosure ☐ Consolidated disclosure including the following subsidiaries or member undertakings:							
Financial year – start date			(dd/mm/yyyy)							
Financial year – end date			(dd/mm/yyyy)							
Product category (CN code) ^{d)}	Description ^{e)}	Number of units discarded ^{f)}	Total weight of units discarded (kg) ^{g)}	Packaging included in the weight of units discarded?	Reason for discarding ^{h)}	Waste treatment operations ⁱ⁾				
						Preparing for reuse (in %)	Destruction			Unknown (in %)
							Recycling (in %)	Other recovery, e.g. energy recovery (in %)	Disposal (in %)	
				☐ Yes ☐ No		%	%	%	%	%
				☐ Yes ☐ No		%	%	%	%	%
Measures <u>taken</u> to prevent the destruction of unsold consumer products ^{j)}										
Measures <u>planned</u> to prevent the destruction of unsold consumer products ^{k)}										

Timeline:



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Ban on the Destruction of Unsold Goods

How to reduce unsold goods

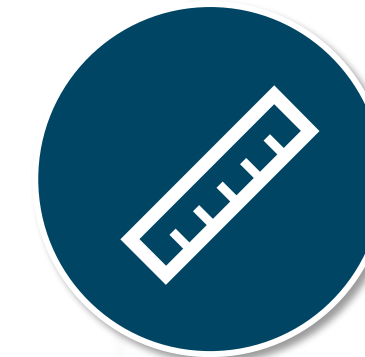
Reduce returns



Accurate product descriptions



Limited return window



Size advice



Invest in digital fitting technologies



Charge for online returns



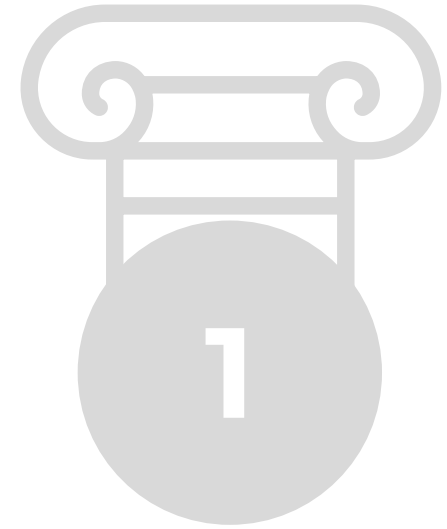
Consumer awareness on environmental, economic and climate costs

Reduce overstocks and obsolete products

- Accurate forecasting
- Improve inventory management
- Optimize fulfilment processing



ESPR **Key Pillars**

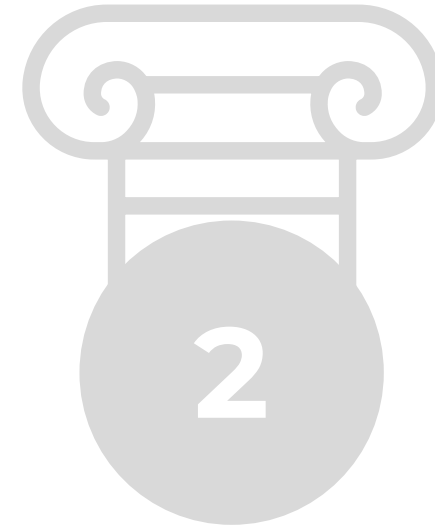


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Digital Product Passports (DPP)

DPP, Ecodesign & Eco-modulation (Textiles)

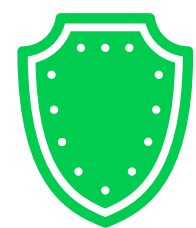
- DPP is the data layer of eco-design
- Enables measurement of durability, recyclability, recycled content
- Critical input for eco-modulated EPR fees

Linking DPP with EPR Data at Scale

DPP complements existing EPR reporting, enabling SKU-level data reuse across policies. It also scales across multiple fractions and markets

DPP as the ‘Golden Thread’ for Textile Circularity

- Supports sorting, reuse, repair, and recycling
- Enables Digital Material Passports (DMPs)
- Bridges product design and end-of-life



**DPP is inevitable
– preparation
must start now**



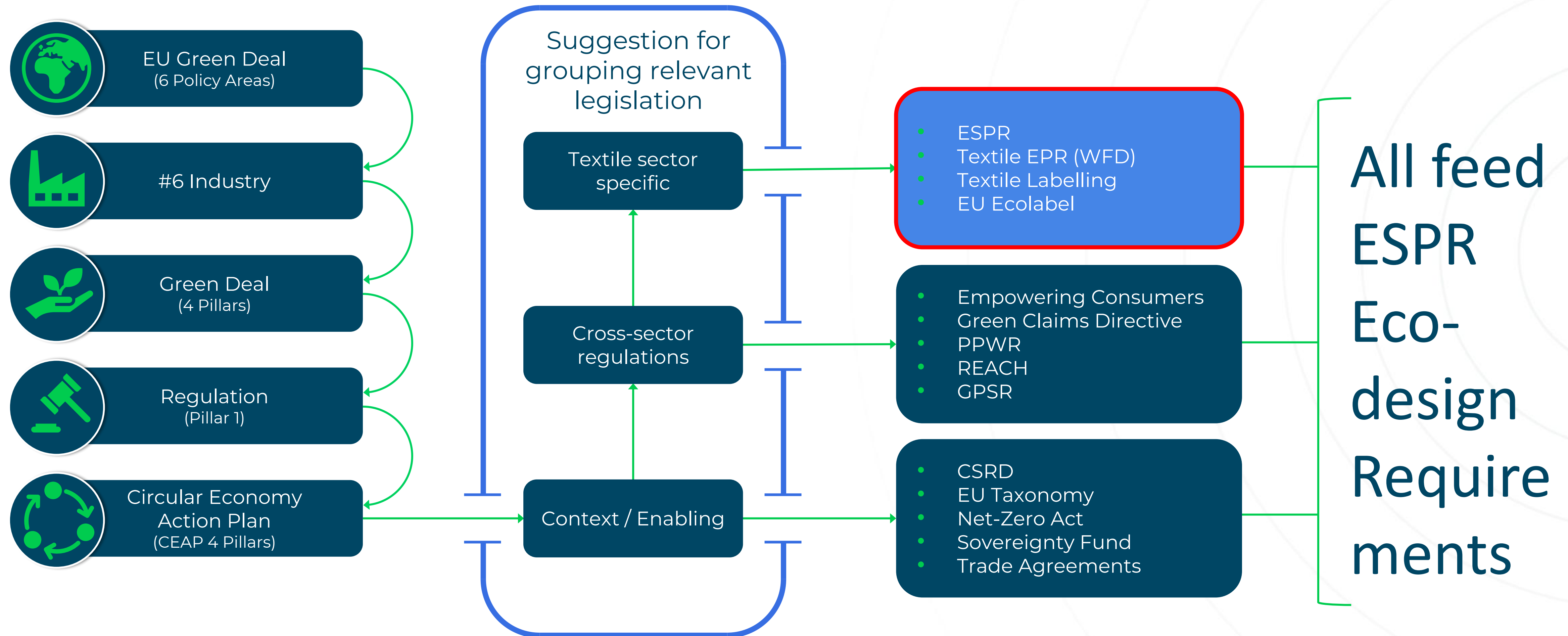
**Data
interoperability is
the real challenge**



**EPR + DPP together
unlock circular
textiles**

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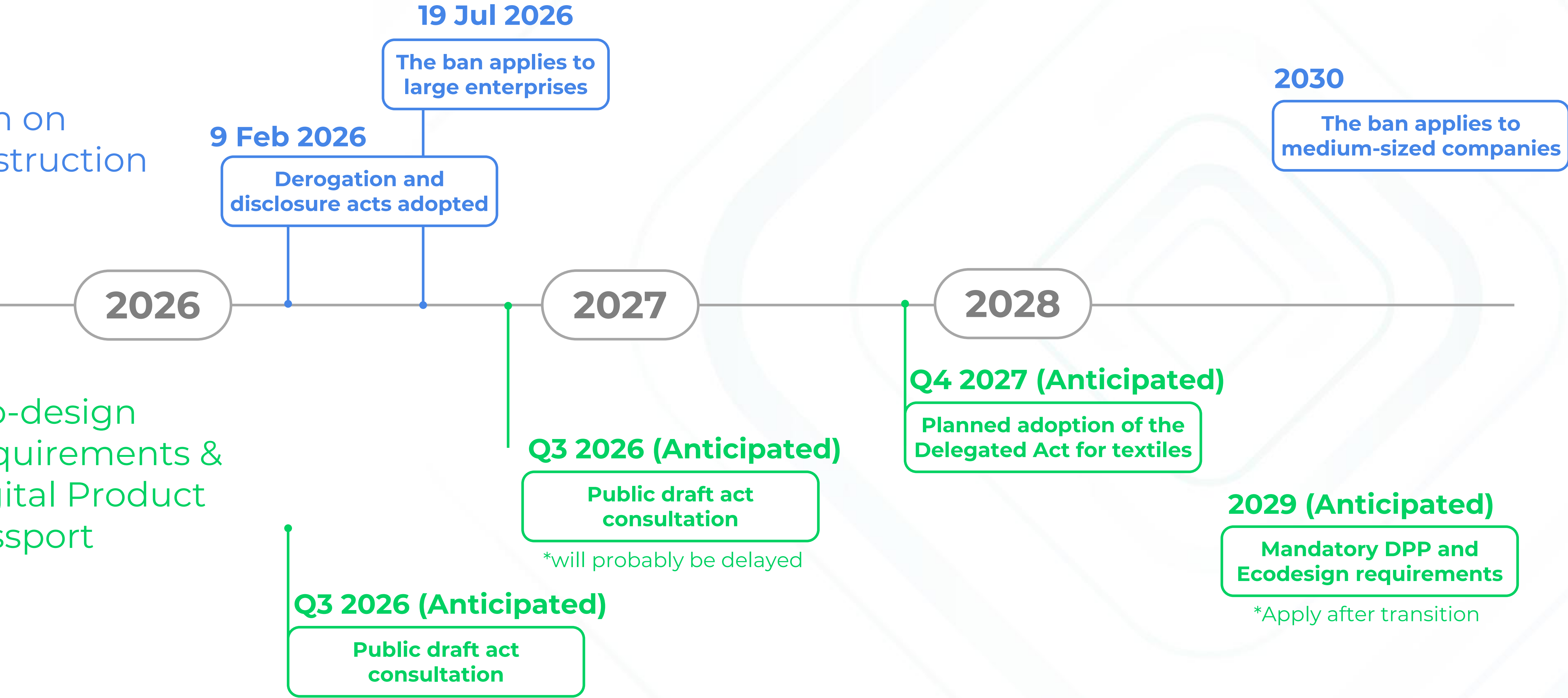
ESPR – Linked Legislation



ESPR for Textile | High-level Timelines

Ban on
Destruction

Eco-design
Requirements &
Digital Product
Passport



Extended Producer Responsibility

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Extended Producer Responsibility (EPR)

Concept:

The company that puts a product on the market is responsible for (and pays for) what happens to it after use.

The principle

- **Polluter pays:** Producers fund end-of-life treatment
- **Lifecycle scope:** Responsibility extends past the sale
- **Proven model:** Standard for packaging, WEEE, batteries; textiles next

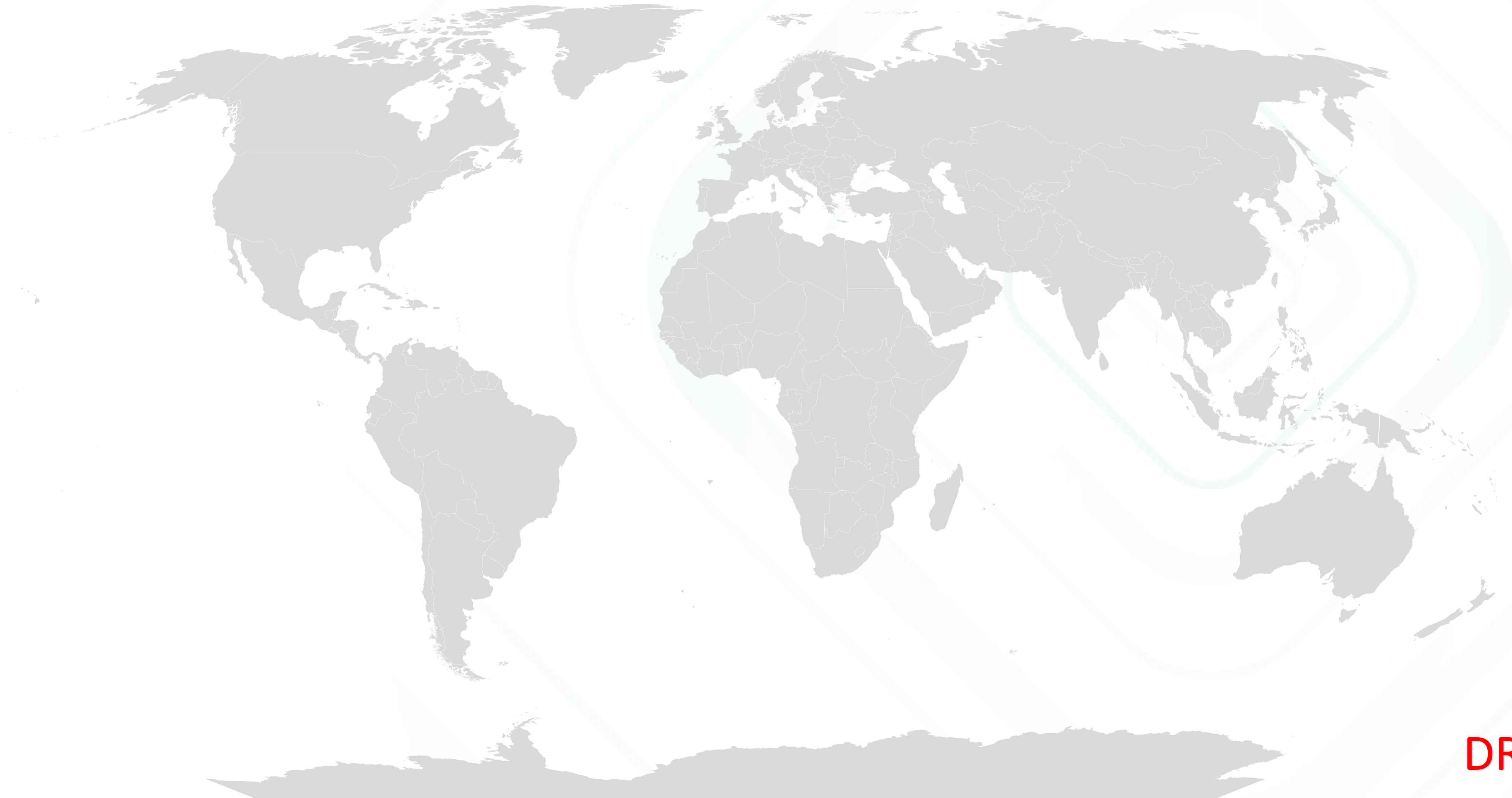
How it works

- **Register and report:** Declare volumes placed on the EU market
- **Pay fees:** Eco-modulated, so better design pays less
- **Join a Producer Responsibility Organization:** Pools fees, runs collection and recycling
- **Meet targets:** Regulators set collection and recycling rates

Global Reach of EU Rules

- **Market access, not location:** The trigger is the EU market
- **Flows down the chain:** Brands pass rules to suppliers
- **Brussels Effect:** EU rules become the global default

EPR Coverage



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EPR Coverage

WEEE

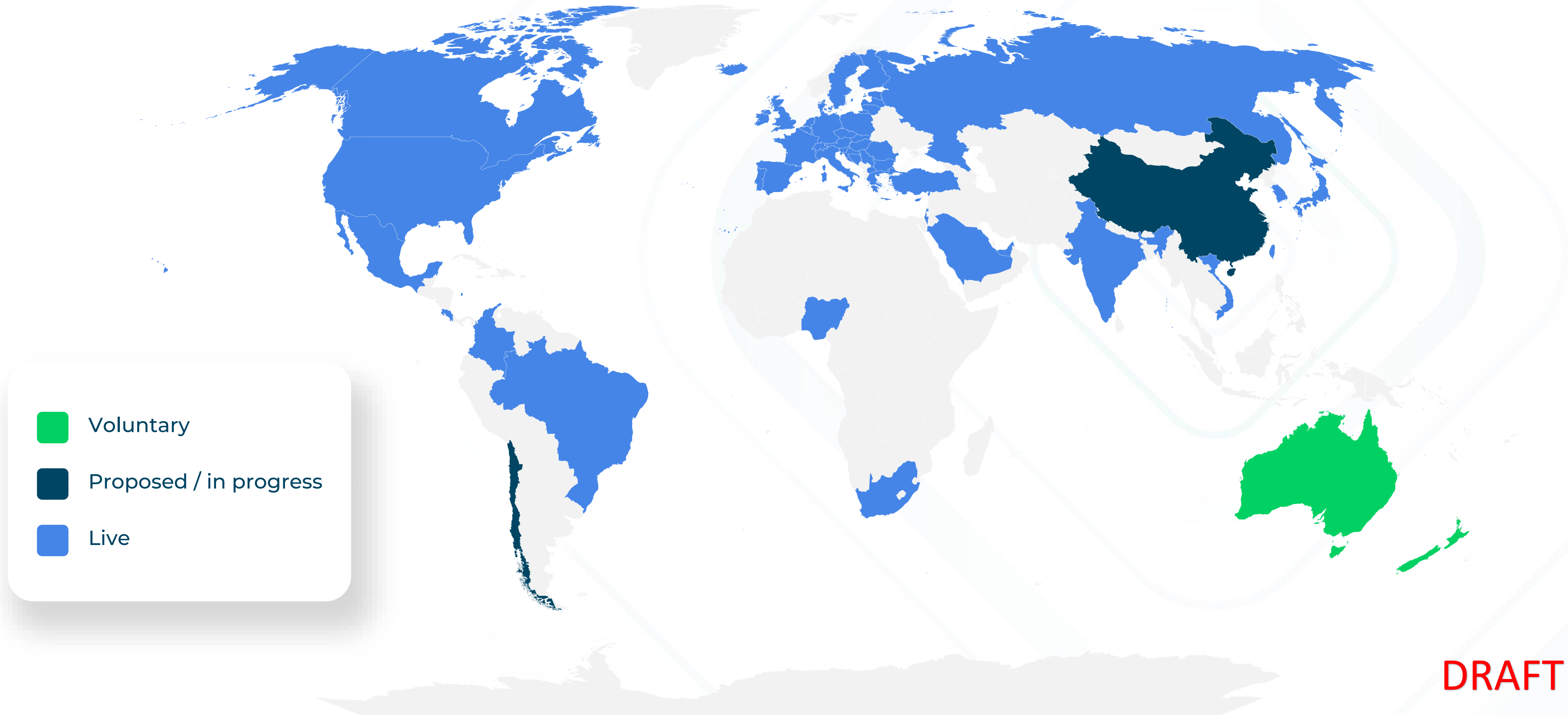
-  Voluntary
-  Proposed / in progress
-  Live
-  Paused

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EPR Coverage

BAT



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EPR Coverage

PACK

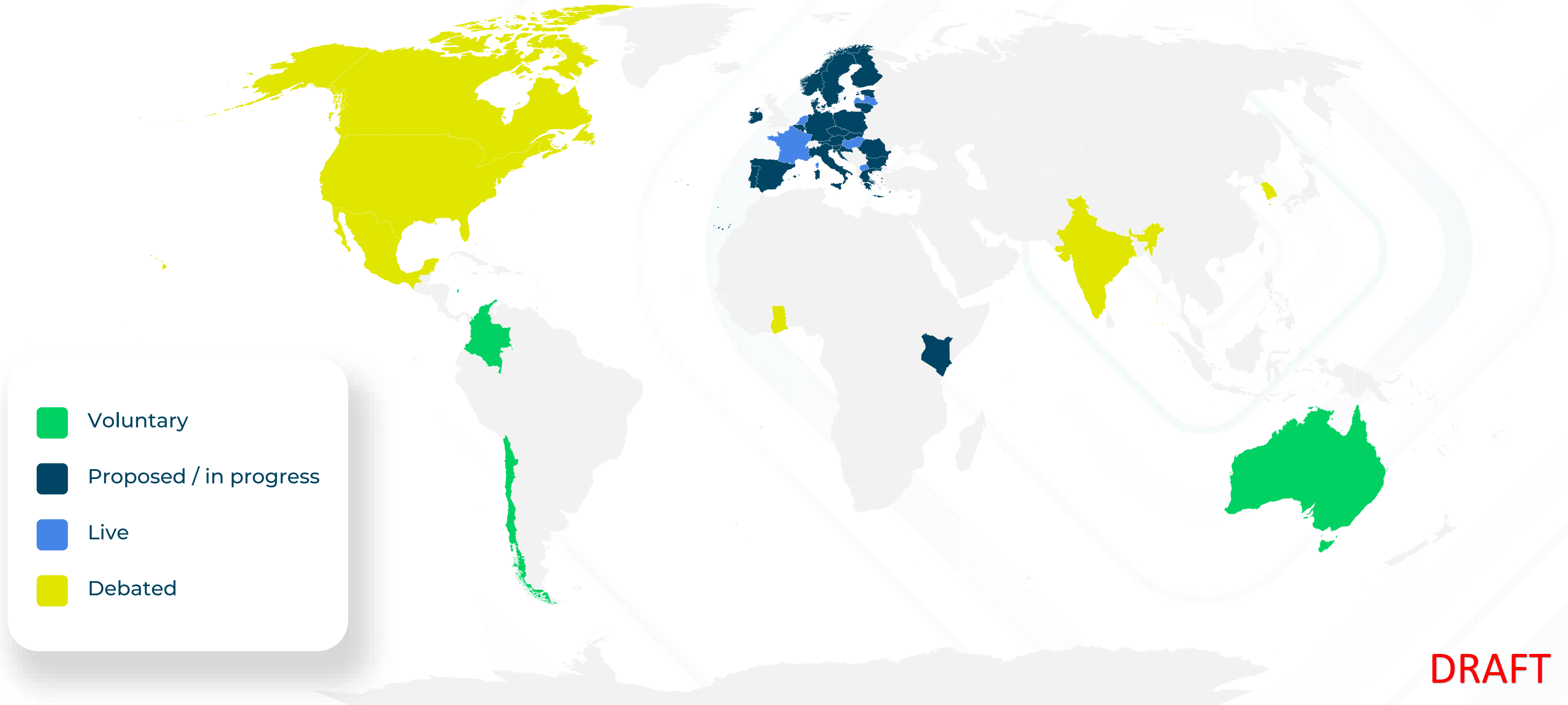
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EPR Coverage

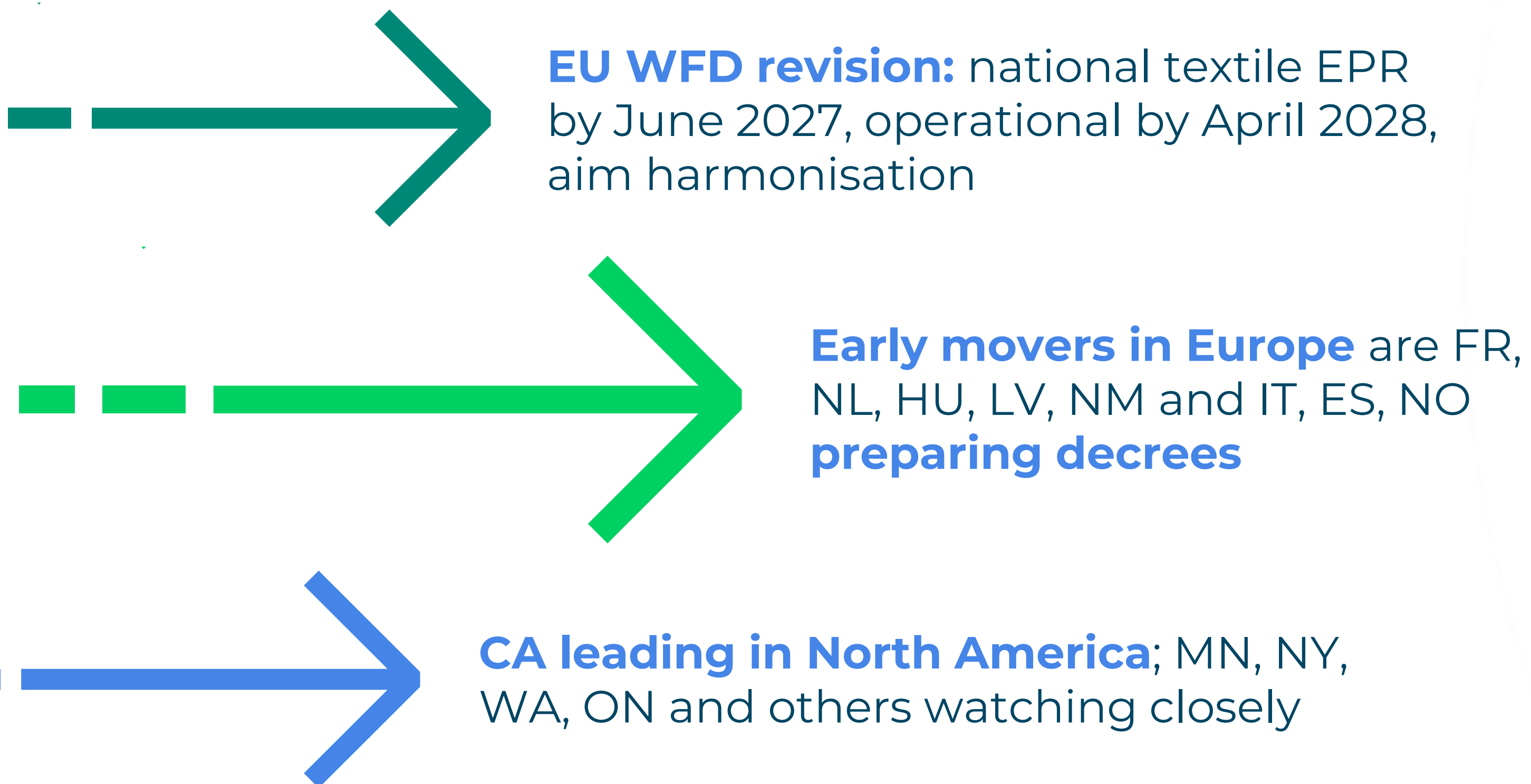
TEXTILES



Overview of Amendments to EU WFD (Textiles)

Item	Summary
Legal Status	Amendments to the WFD adopted – mandatory EPR for textiles across all EU members States
Timeline	16 Oct 2025 – Entry into force 17 Jun 2027 – Latest date for Member States to bring into force the laws, regulations and administrative provisions 17th April 2028 – Latest date for Member States to ensure producers cover the costs
Who’s Responsible	Brands, importers, distributors & online sellers placing textiles/footwear on the EU market
Products in Scope	Clothing, household textiles, accessories, footwear (via CN codes)
Key Obligations	Fund & organize collection, sorting, reuse, repair & recycling – Consumer awareness – Data reporting – EU registration – Support eco-design
Fee Principles	Weight based, transparent - lower fees for durable/ recyclable/ recycled content
Reporting	Annual via harmonized EU format
Governance	Multi PROs encouraged – Public transparency on performance and exports

Regulatory Timeline: EU and Beyond



Patchwork reality: one policy, many versions

- **Different product scopes** (e.g. footwear in vs out)
- **Different fee structures**, reporting cycles, performance targets
- Brands and retailers need **country-by-country clarity** to avoid compliance and cost surprises

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EPR for Textiles

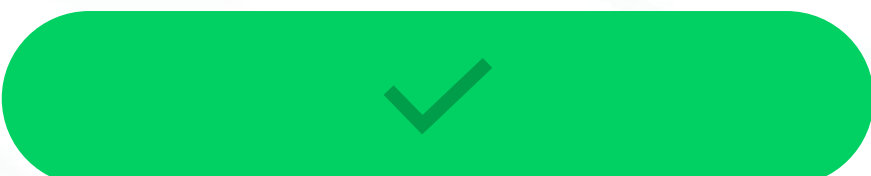
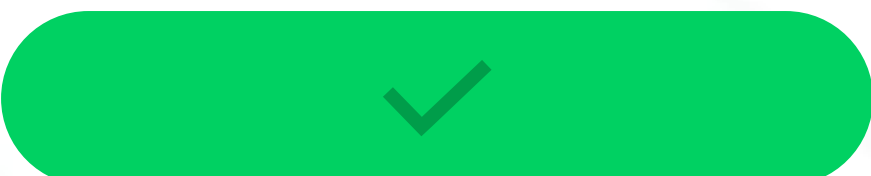
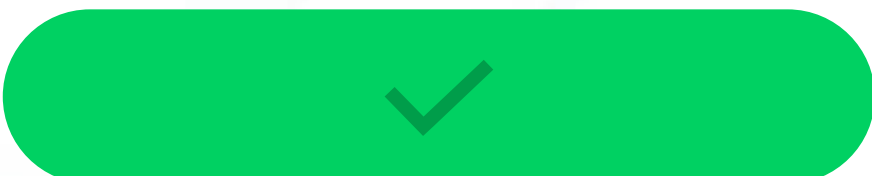
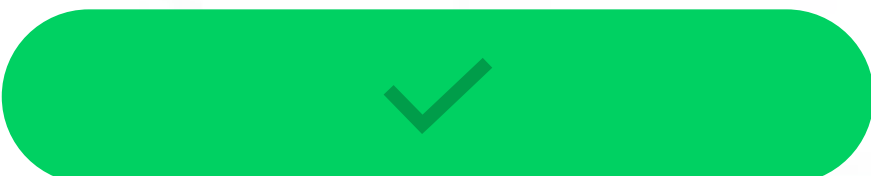
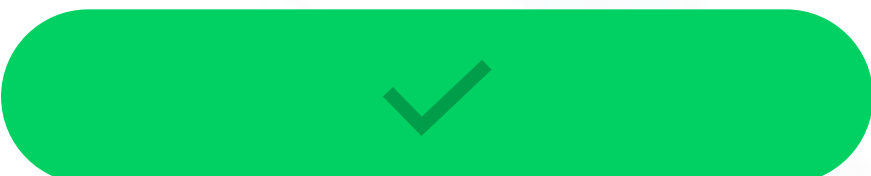
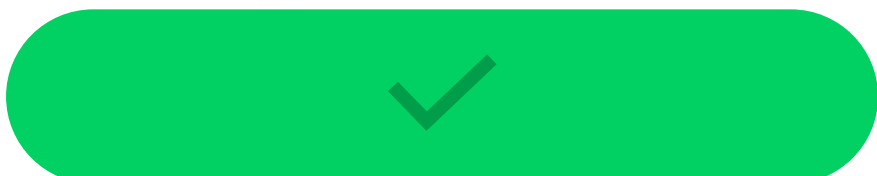
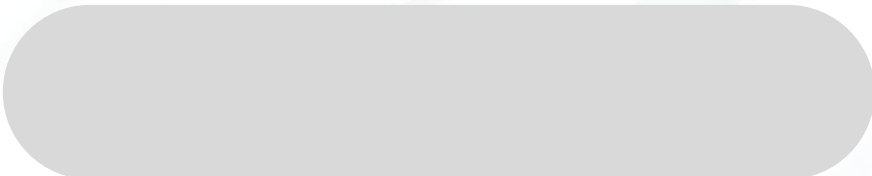
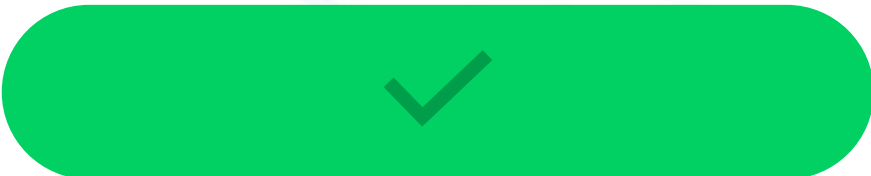
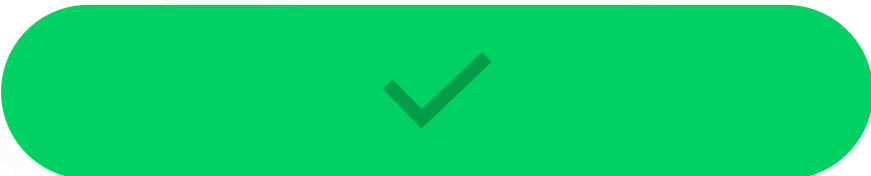
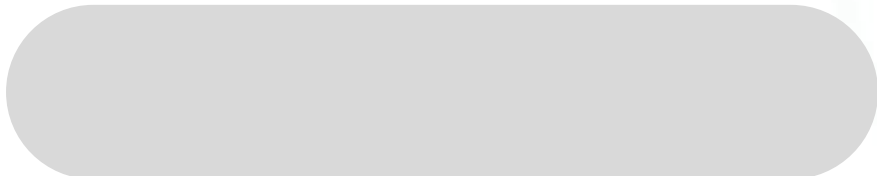
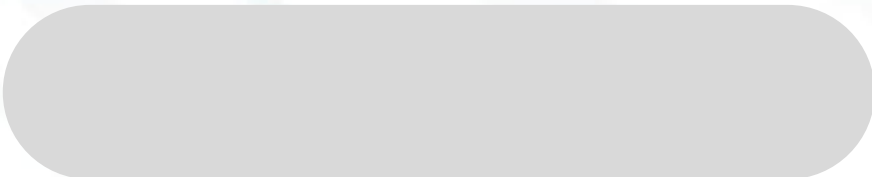
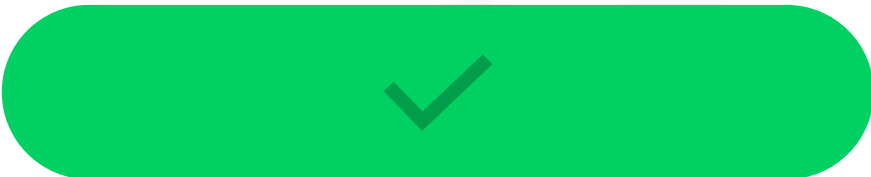
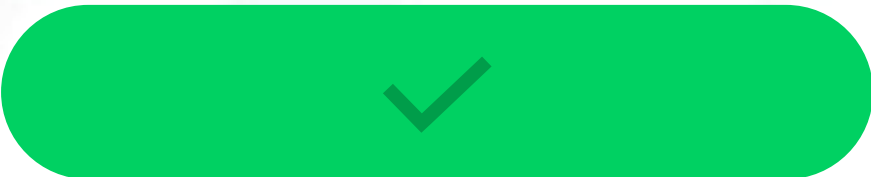
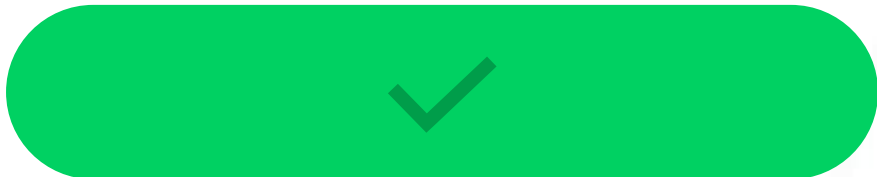


France

Hungary

Latvia

Netherlands



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Your Textile EPR **Obligations**



Register

Enroll in each Member State's national producer register



Join PRO

Join Producer Responsibility Organization to meet the obligations on your behalf



Report

Submit regular declarations of quantities placed on the market



Pay EPR fees

Pay EPR fees, set on weight and product types



Consider eco-design

Materials and durability matter, greener products could mean lower cost



Finance End-of-Life

Cover the cost of separate collection, sorting, preparing for re-use, and recycling

ESPR *vs.* EPR

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ESPR vs. EPR

Dimension	ESPR	EPR (Textile)
Lifecycle focus	Product design / upstream	End-of-life/waste management, downstream (also design via eco-modulation)
Legal instrument	Regulation - directly applicable, uniform across the EU	Directive - requires national transposition; details vary by Member State
Core objective	Make products durable, circular, and low-impact by design	Make producers responsible for collection, sorting, and recycling of textile waste
Scope	Horizontal — nearly all physical products	Sector-specific — clothing, footwear, household textiles
How it takes effect	Delegated acts, product group by product group	National EPR schemes run through PROs, established by each Member State
Key instruments	Ecodesign requirements, DPP, destruction ban, GPP	Producer fees, separate collection, PROs, collection, reuse and recycling obligations
Financial mechanism	Design costs (Compliance cost; no direct fee)	EPR Fees (EPR fees and Eco-modulated paid by producers)
Status / timeline	In force Jul 2024; textile Ecodesign delegated act expected ~2027	In force Oct 2025; transpose by Jun 2027; schemes operational by ~Apr 2028

Impact, Challenges, and How to Prepare?

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Textile Regulation: The Direction of Travel is clear

- **More product groups:** Scope widens from the first categories to the whole market over time
- **Tighter thresholds:** Legal requirements will grow and tighten over time
- **Data as the backbone:** Enforcement runs on data, not declarations
- **The map keeps expanding:** The EU sets the baseline, other jurisdictions follow

Two Roles, Two Sets of Challenges

Producers (placing on the EU market)

- **Role:** Hold the legal obligation. Register, pay EPR fees, report, comply with EPR and ESPR
- **Divergent legal requirements:** Different rules across geographies
- **Volume of legislation:** EPR, ESPR, and DPP at once, alongside CSRD, CSDDDD, and REACH.
- **Complex supply chains:** Limited visibility and control over upstream tiers
- **Upstream data gaps:** The supplier data you need often does not exist yet or is not standardized

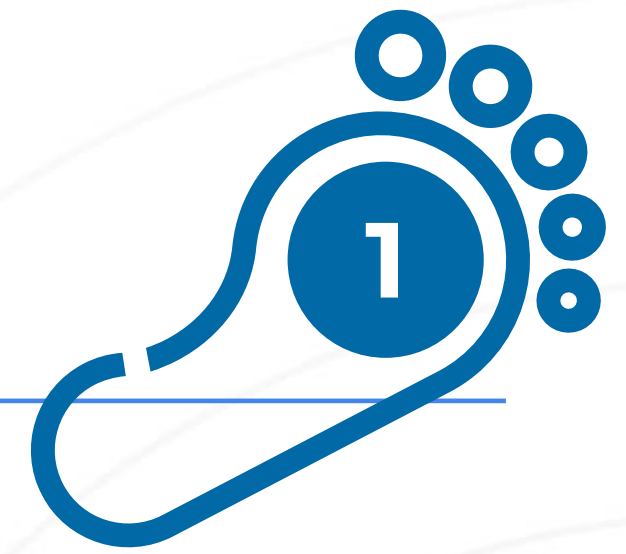
Suppliers

- **Role:** Not directly obligated, but pulled in through customers. Must supply the data and design features that let customers comply and qualify for eco-modulation.
- **Fragmented data formats:** No common schema. Every customer and authority wants a different structure.
- **Deep supply-chain data:** Data needs push down to factory and raw-material level.
- **Country-by-country divergence:** Definitions and requirements already differ across markets.
- **Eco-modulation exposure:** Weight-based fees passed down, with bonuses hard to substantiate.

The 5-Step Roadmap to Regulatory Readiness

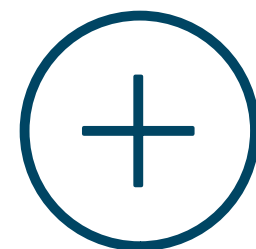
- 1. Governance and Ownership:** Who owns EPR and ESPR inside your business
- 2. Understand Scope:** Your obligations, markets, and products in scope
- 3. Manage Data:** The core of both reporting and the Digital Product Passport
- 4. Integrate Product Strategy:** Design for Ecodesign rules and eco-modulation
- 5. Operationalize Compliance:** Stay compliant as both frameworks tighten

1. Establish Governance and Ownership



Appoint an EPR-ESPR Lead

- Authority to drive compliance program
- Coordinates internal teams & external partners
- PRO registration, reporting & regulatory changes
- Oversees recyclability claims & product labelling



Cross-Functional Task Force

- Legal / Compliance
- Sustainability
- Product Development
- Operations & Sourcing
- Data & Finance
- Marketing



Purpose:

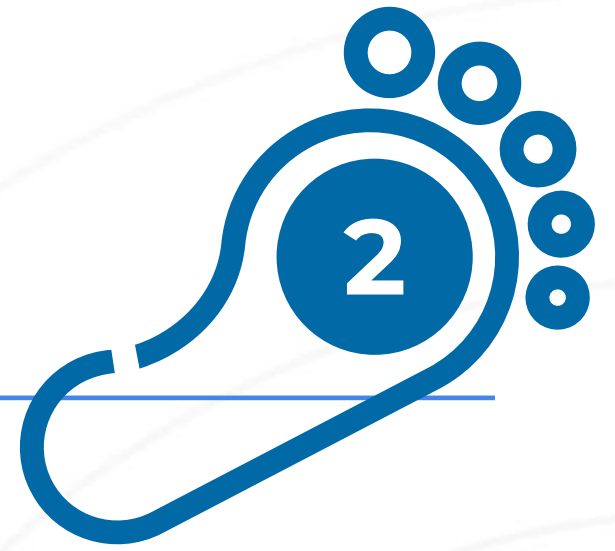
- EPR spans design, supply chains, legal, data & communication
- Collaboration ensures compliance & unlocks strategic benefits



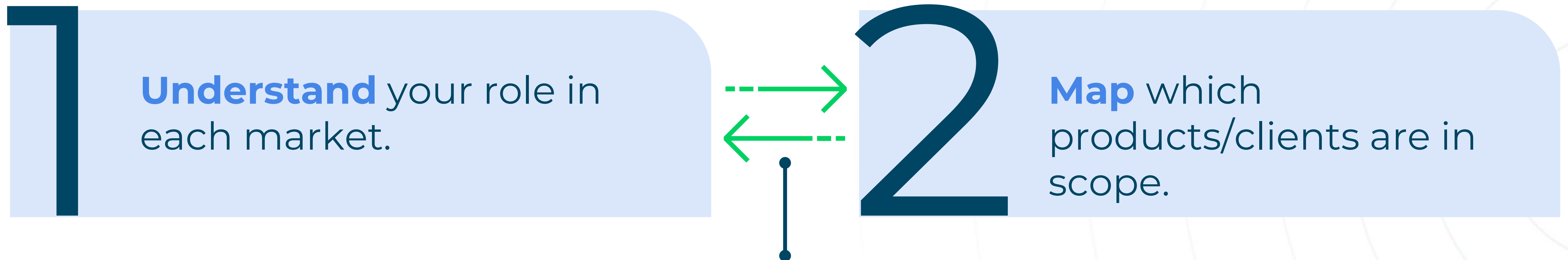
Responsibilities:

- Define shared goals
- Assign clear ownership
- Align compliance with business strategy

2. Understand Scope



To manage EPR effectively, brands must track current and upcoming requirements, especially in Europe and North America.



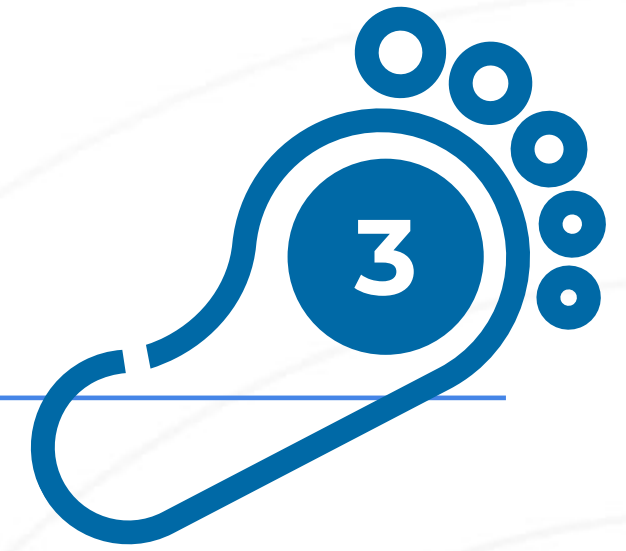
These steps define your company's **scope** and **market exposure**.



Without a clear understanding of obligations, brands risk underestimating costs, missing reporting deadlines, or damaging their reputation.

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Step 3. Collect, Curate, and Manage Data



The core of both EPR reporting and the Digital Product Passport

Producers

- **Identify internal data owners:** Assign owners for specs, materials, weights, and volumes
- **Engage suppliers early:** Collect fiber composition, finishing, and certifications up front
- **Align with national PRO templates:** Each PRO wants a different format. Reshape per market
- **Fill data gaps smartly:** Use platforms or partners to validate or estimate missing data
- **Set up supplier follow-up:** A repeatable process to chase missing or incorrect data

Suppliers

- **Confirm the data exists:** Check availability first, especially deep in the chain
- **Organize your own data:** Get your house in order before passing anything up
- **Standardize once:** Build one clean dataset, reuse it across customers
- **Reach up the chain:** Source factory and raw-material data where the DPP needs it

Look ahead: Capture what ESPR, especially DPP, will require, not only today's EPR fields

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Step 4: Integrate Product Strategy

Design for the rules up front

Producers

- **Train design and sourcing teams:** Show how material choices drive future EPR cost
- **Flag fee-heavy materials:** Build a watchlist of hard-to-recycle components and trims
- **Embed circularity targets:** Set recycled content, simplify mixes, cut packaging
- **Innovate with suppliers:** Co-develop new materials and close data gaps upstream

Suppliers

- **Learn the same criteria:** Understand how your customers are scored
- **Offer qualifying features:** Provide materials and construction that earn bonuses
- **Substantiate the claim:** Back eco-features with the data that makes them count
- **Position as eco-preferred:** Make good design your commercial differentiator

Design once for both: ESPR pushes ecodesign up front, EPR rewards it through eco-modulation

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Step 5: Operationalize Compliance

Producers

- **Register and report on time:** Complete PRO registrations and submit all data to deadline.
- **Forecast EPR cost:** Model fee scenarios and build them into business planning.
- **Equip your supply chain:** Create guidance packs and train partners for consistency.
- **Review each cycle:** Track design impact on cost and improve data systems.

Suppliers

- **Make responses repeatable:** A standing process for recurring customer data requests.
- **Retain your evidence:** Hold the records that back your data and eco-claims.
- **Track what shifts upstream:** Follow the rules that reshape customer demands.
- **Refresh as ranges change:** Update data for new products and new customers.

Compliance is a cycle, not a project: requirements under both frameworks only grow and tighten

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Turn Compliance Into an Advantage

- **The work pays back:** What you do now shows up later as margin and market access
- **Producers:** Lower fees, eco-modulation bonuses, and EU markets that stay open to you
- **Suppliers:** Ready data and the right features keep you on the customer's list
- **Data decides it:** The teams that sort their data first move ahead of the ones still scrambling

Thank you!



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