RREUSE's feedback on a call for evidence on Textiles Labelling rules revision

SEPTEMBER 2023

RREUSE's feedback on a call for evidence on Textiles Labelling rules revision

As the European network of social enterprises active in repair, re-use and recycling, RREUSE welcomes the European Commission's (EC) intention to evaluate and review the Textiles Labelling Regulation (TLR). The last partial assessment dates back to 2014 and contains persistent issues.

As the EC pointed out in its [call for evidence for an impact assessment and an evaluation](#), the current Regulation's strict focus on fibre identification is a major limitation. It leads to disparate labelling rules across Member States, affects the quality and reliability of information provided to consumers and contributes to the textile sector's lack of sustainability.

The TLR revision is an opportunity to ease textile waste management. As we explain in more detail below (1), improving rules on fibre composition determination and providing more complete and reliable information to sorters will facilitate the sorting process.

Similarly, by providing consumers with clear and reliable information on the products' sustainability and circularity potential, the revision can empower them to make more sustainable decisions and extend products' lifetime. As a result, the revision could positively impact the second-hand market's scalability (see point 2 below).

1. How could the review improve sorting for re-use?

The revision should address the issues that affect social enterprises involved in textile sorting and undermine the sorting process' quality and the re-use sector's growth, namely:

 a. the high proportion of missing labels,
 b. the unreliability of fibre identification rules,
 c. the lack of harmonised sizes.

Addressing the issues and corresponding measures in more detail:

 a. At the sorting point, many garment labels are unreadable (washed off) or missing (six in ten (62%) EU citizens are estimated to cut their garment labels[1]). The envisaged introduction of a digital label could be an effective option to deal with this problem, under two conditions: 1) Consumers cannot easily remove the digital label; and 2) Its introduction and the related equipment costs do not burden the sorters. To meet the second condition, social enterprises and SMEs should receive sufficient financial and operational support through investments in digital and physical infrastructureas well as training for employees. Additionally, the technology should be interoperable and open-source to keep costs down.

 b. There are estimates that four in ten (41%) labels indicate the wrong fibre composition[2]. Fibre identification rules need to be revised to change this and ensure the labels match the fibre composition. This is essential to facilitate textile waste management, especially in view of the upcoming mandatory separate collection and the resulting increase in collection volumes. Although

---

[1] GINETEX (2017) A barometer for textile care labelling in Europe. (Available [here](#)).

[2] Fashion United (2020) #Whatsinmyclothes: The truth behind the label. (Available [here](#)).

rreuse

better fibre identification rules are a prerequisite to automatic sorting and recycling processes' development, the revised Regulation should – in line with the waste hierarchy[3] – prioritise waste prevention and re-use while ensuring that automated and manual sorting are complementary.

c. Additionally, the revision should introduce a European standardisation of clothing sizes. These should be based on an objective measurement that avoids the usage of terms that can feel discriminatory (e.g. small, medium, and large). Standardised sizes would facilitate the purchase of second-hand clothes and limit the practice of purchasing several sizes of the same items online.

2. How could the review extend textile products' lifetime and strengthen the re-use sector?

It has been estimated that 70% of EU citizens follow care instructions[4] and 86% consider that the label should provide more information on the environmental and social impact of clothing products[5]. The TLR revision could be an opportunity to support the second-hand sector and sustainable consumption behaviours by providing consumers with reliable information on:

a. their products' circularity performance,
b. their products' origin,
c. and by supporting upcycling initiatives.

a. First, the revised Regulation should empower consumers to adopt circular behaviour. To this end, we encourage the EC to introduce circularity parameters aligned with the waste hierarchy. This should include durability guarantees, as well as repair and end-of-life instructions. The label should also indicate the garment's production date as well as its expected lifetime to track the product's durability. Here, we recommend providing information on the expected number of washes after which the product begins to show noticeable wear and tear. The Commission should ensure that the introduction of a digital label will be coherent with the Digital Product Passport, especially with regard to the introduction of sustainability and durability parameters. Most importantly, we encourage the introduction of a single data carrier.

b. Currently, "made in" claims are misleading. Production stages take place in various countries, but this is not reflected by the current origin labelling. The revised labelling should develop clear criteria for origin claims and require that labels disclose all the countries the product has been through in its production journey.

c. Finally, the revision should maintain the exemption from labelling requirements for upcycled products to protect social enterprises and other circular business models. The multiple components used in upcycled pieces and the lack of knowledge about their fibre composition make it very difficult to meet the labelling requirements.

Contact: Marie-Jeanne Gaertner
Project and Advocacy Officer at RREUSE
marie-jeanne.gaertner@rreuse.org

---

[3] European Commission Waste Framework Directive. (Available here).
[4] GINETEX (2017) A barometer for textile care labelling in Europe. (Available here).
[5] Eurobarometer (2020) Attitudes of Europeans towards the Environment. (Available here).

rreuse