

29 September 2023, Brussels

FEAD feedback call for evidence on the revision of the EU textiles labelling rules

FEAD supports the revision of EU rules on textile labelling to ensure the correct information of consumers. The waste management sector needs information on the waste received, but a label at product level will have little added value for waste managers working with big and bulky flows and applying automatic (sorting) processes. It will however help consumers to choose more sustainable products (recyclable products that include recycled materials) and to discard (sort) them properly at the end of their life, which is positive for our industry.

When the waste reaches the plants, it is subject to automatic sorting processes, primarily mechanical, physical, and optic scan processes. In the case of textiles, automatic sorting will need to do an optic scan on fibre content in any case. In this respect, while it is relevant to have information available, this information on a label on the product will hardly reach the waste management sector in a way that it can be used according to the processes mentioned before. Therefore, a label or product passport at product level has little added value at this stage of the waste management. Nevertheless, such a label or product passport in form of QR-code, or similar, could still have a positive impact for the sector as it will improve the separate collection at source (by the consumer).

Considering that the availability of information is still important (especially for source segregation), it needs to be ensured that the label/product passport actually reaches the end of life of the product and the waste managers. If it would be a QR-code or written information on the existing textile cloth or fabric price and material tag, it will be detached before actual usage of the good. Therefore, **the information should be undetachable from the good and made from the same materials as the good itself to avoid further mixing of materials.**

The information to be provided to consumers should focus on relevant data that enables a smooth circular process of the garment. Consistency across legislation should be guaranteed (Textile Labelling Regulation and Ecodesign Regulation). In the case of textiles, information on

- materials used,
- material components,
- presence of substances of concern, and
- the possibility of remanufacturing and recycling (design for recycling)

is important for sorting and recycling activities, including source segregation.

In addition, **the following information will enable sustainable choices for consumers:**

- recycled content;
- possibility of recovery of materials;
- environmental impacts, including carbon and environmental footprint;
- energy use or energy efficiency.

A relevant challenge will be to ensure the reliability/accuracy of the data used in the process / passport. A possibility could be to add this as a quality requirement to standardised processes.

FEAD and its members are ready to enter into dialogues with the institutions and all relevant stakeholders to explain the needs of our industry and improve the labelling, sustainability and circularity of textiles.

FEAD is the European Waste Management Association, representing the private waste and resource management industry across Europe, including 18 national waste management federations and 3,000 waste management companies. Private waste management companies operate in 60% of municipal waste markets in Europe and in 75% of industrial and commercial waste. This means more than 320,000 local jobs, fuelling €5 billion of investments into the economy every year. For more information, please contact:

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