

Part 1 of 2 of the questionnaire on the working document: Preparatory study on textiles for product policy instruments - 3rd milestone

Fields marked with * are mandatory.

Introduction

Context of the questionnaire

Welcome to the **Part 1 of 2** of the questionnaire that will allow you to contribute to the development of the [preparatory study on textile products](#).

Deadline for submission of answers and comments: **30 March 2026** at 23:59 CET.

On 16 December 2025, the Joint Research Centre (JRC) of the European Commission shared with all registered stakeholders the [working document of the 3rd milestone](#).

On 14 and 15 January 2026, registered stakeholders and the JRC exchanged ideas during an online workshop about Tasks 4, 5 and 6 of the working document.

On 30 January, stakeholders received a PDF version of the questionnaire providing detailed information on the content and structure of all questions related to the working document of the 3rd milestone, on which the JRC would welcome feedback from stakeholders.

From 5 February to 30 March 2026, all registered stakeholders will be able to provide **written feedback** to the working document of the 3rd milestone via two dedicated EU Survey forms.

The consultation process enables the JRC to improve the work under development and the exchange with registered stakeholders aims to:

- verify the work done to date,
- collect additional evidence on the investigated topics.

Structure of the Part 1 of 2 of the questionnaire

Part 1 of 2 of the questionnaire has 8 sections:

1. Profile of the respondent
2. Analysis of technologies in the context of physical durability
3. Analysis of technologies in the context of repairability
4. Analysis of technologies in the context of recycled content
5. Design options (DOs) not included in the model
6. DO1 on robustness
7. DO2 on recyclability
8. DO3 on recycled content

The questionnaire is designed and implemented in a way that should enable stakeholders to easily identify the sections they wish to comment, allowing them to skip those sections which they do not wish to comment.

Section 14 of Part 2 of 2 of the questionnaire further allows all registered stakeholders to provide up to 10 written comments to the working document on topics not otherwise specifically covered in the questionnaire. Should you wish to provide more than 10 comments, you are welcome to **submit more than one questionnaire**. If you wish to share a document to support your position further, you may do so by sending it via email to **JRC-B5-TEXTILES@ec.europa.eu**, clearly indicating if the submitted information should be treated as confidential. Please note that comments made in Section 14 of Part 2 of 2 of the questionnaire or documents sent via email should not reiterate or substitute the answers on topics asked in other sections of the questionnaire. We would be grateful if you can support the JRC in analysing the comments received by using to the maximum extent possible the structured questionnaire provided.

Confidentiality of personal data and information provided

Data and information collected via this questionnaire will be treated confidentially and complying with the Regulation on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data ([Regulation \(EU\) 2018/1725](#)).

Therefore, data will be treated for the development of EU policies on textiles, and it will be of the exclusive use of the European Commission. The European Commission will process data and information complying with the referred regulation. For more information, please visit the privacy statement under [this link](#) (processing of personal data for user management purposes) and [this link](#) (processing personal data within the survey itself).

1. Profile of the respondent

	First name	Last name	Email address
. *	Lasse	Leipola	lasse.leipola@finnwatch.org

*** Publication of information in my contribution**

- ☒ I **consent** to the publication, by the European Commission's JRC, of any information in my contribution, in whole or in part (which may include quotes or opinions I express), provided that the personal information submitted under "stakeholder information" is not disclosed. Publication of the information may include publication in aggregated or disaggregated form of your contributions in JRC intermediate deliverables or final reports that may be made publicly available via the JRC's [project website](#).
- ☐ I do **not consent** to the publication of any information in my contribution.

☒ I guarantee that:

- My response does not infringe any intellectual property rights, including without limitation, copyright, database sui generis rights or trademark rights or any other third party rights;
- To the extent that my response contains materials from other sources (e.g., text, illustrations, graphs, tables), I have obtained written permission from the relevant copyright owners to include such materials in my response, in a way that allows the European Commission to publish my response;
- I can provide copies of any relevant written permissions/licences, at the request of the European Commission; If my response contains materials made available under an open licence (e.g. Creative Commons), I indicate the type of licence, together with the source and author's name, in my response;
- Nothing in my response is obscene, defamatory, violates any right of privacy or duty of confidentiality, infringes any other rights of any person or entity or is otherwise unlawful.

*** 1.1 Name of the submitting organization**

What is the name of the organization you represent in this questionnaire?

Text of 1 to 300 characters will be accepted

Finnwatch

*** 1.2 Type of the organization**

Select the type of organization you represent in this questionnaire:

- ☐ Government (e.g. Member States, regions, EU Ecolabel competent bodies, national and regional agencies, etc.)
- ☐ Textile industry
- ☐ Textile industrial association
- ☐ Waste management industry
- ☐ Waste management industry association
- ☐ Consumer organization
- ☐ Environmental Non-governmental organization (NGO)
- ☒ Other Non-governmental organization (NGO)
- ☐ Research institutions, including universities
- ☐ Test laboratory
- ☐ Other

*** 1.3 Country of the organization**

Select the country of the organization you represent in this questionnaire:

- | | | | |
|--|--|--|--|
| ☐ Afghanistan | ☐ Dominican Republic | ☐ Lithuania | ☐ San Marino |
| ☐ Albania | ☐ Ecuador | ☐ Luxembourg | ☐ Sao Tome and Principe |
| ☐ Algeria | ☐ Egypt | ☐ Madagascar | ☐ Saudi Arabia |
| ☐ Andorra | ☐ El Salvador | ☐ Malawi | ☐ Senegal |
| ☐ Angola | ☐ Equatorial Guinea | ☐ Malaysia | ☐ Serbia |
| ☐ Antigua and Barbuda | ☐ Eritrea | ☐ Maldives | ☐ Seychelles |
| ☐ Argentina | ☐ Estonia | ☐ Mali | ☐ Sierra Leone |
| ☐ Armenia | ☐ Eswatini | ☐ Malta | ☐ Singapore |
| ☐ Australia | ☐ Ethiopia | ☐ Marshall Islands | ☐ Slovakia |
| ☐ Austria | ☐ Fiji | ☐ Mauritania | ☐ Slovenia |
| ☐ Azerbaijan | ☒ Finland | ☐ Mauritius | ☐ Solomon Islands |
| ☐ Bahamas | ☐ France | ☐ Mexico | ☐ Somalia |
| ☐ Bahrain | ☐ Gabon | ☐ Micronesia | ☐ South Africa |
| ☐ Bangladesh | ☐ Gambia | ☐ Monaco | ☐ South Korea |
| ☐ Barbados | ☐ Georgia | ☐ Mongolia | ☐ South Sudan |
| ☐ Belarus | ☐ Germany | ☐ Montenegro | ☐ Spain |
| ☐ Belgium | ☐ Ghana | ☐ Morocco | ☐ Sri Lanka |
| ☐ Belize | ☐ Greece | ☐ Mozambique | ☐ Sudan |
| ☐ Benin | ☐ Grenada | ☐ Myanmar | ☐ Suriname |
| ☐ Bhutan | ☐ Guatemala | ☐ Namibia | ☐ Sweden |
| ☐ Bolivia | ☐ Guinea | ☐ Nauru | ☐ Switzerland |
| ☐ Bosnia and Herzegovina | ☐ Guinea Bissau | ☐ Nepal | ☐ Syrian Arab Republic |
| ☐ Botswana | ☐ Guyana | ☐ Netherlands | ☐ Tajikistan |
| ☐ Brazil | ☐ Haiti | ☐ New Zealand | ☐ Tanzania |
| ☐ Brunei Darussalam | ☐ Honduras | ☐ Nicaragua | ☐ Thailand |
| ☐ Bulgaria | ☐ Hungary | ☐ Niger | ☐ Timor-Leste |
| ☐ Burkina Faso | ☐ Iceland | ☐ Nigeria | ☐ Togo |
| ☐ Burundi | ☐ India | ☐ North Korea | ☐ Tonga |
| ☐ Cabo Verde | ☐ Indonesia | ☐ North Macedonia | ☐ Trinidad and Tobago |
| ☐ Cambodia | ☐ Iran | ☐ Norway | ☐ Tunisia |
| ☐ Cameroon | ☐ Iraq | ☐ Oman | ☐ Turkmenistan |
| ☐ Canada | ☐ Ireland | ☐ Pakistan | ☐ Tuvalu |
| ☐ Central African Republic | ☐ Israel | ☐ Palau | ☐ Türkiye |
| ☐ Chad | ☐ Italy | ☐ Panama | ☐ Uganda |
| ☐ Chile | ☐ Jamaica | ☐ Papua New Guinea | ☐ Ukraine |
| ☐ China | ☐ Japan | ☐ Paraguay | ☐ United Arab Emirates |
| ☐ Colombia | ☐ Jordan | ☐ Peru | ☐ United Kingdom |
| ☐ Comoros | ☐ Kazakhstan | ☐ Philippines | ☐ United States of America |
| ☐ Congo | ☐ Kenya | ☐ Poland | ☐ Uruguay |

- | | | | |
|--|-------------------------------------|--|-------------------------------------|
| ☐ Costa Rica | ☐ Kiribati | ☐ Portugal | ☐ Uzbekistan |
| ☐ Croatia | ☐ Kuwait | ☐ Qatar | ☐ Vanuatu |
| ☐ Cuba | ☐ Kyrgyzstan | ☐ Republic of Moldova | ☐ Venezuela |
| ☐ Cyprus | ☐ Laos | ☐ Romania | ☐ Viet Nam |
| ☐ Czechia | ☐ Latvia | ☐ Russian Federation | ☐ Yemen |
| ☐ Côte D'Ivoire | ☐ Lebanon | ☐ Rwanda | ☐ Zambia |
| ☐ Democratic Republic of the Congo | ☐ Lesotho | ☐ Saint Kitts and Nevis | ☐ Zimbabwe |
| ☐ Denmark | ☐ Liberia | ☐ Saint Lucia | ☐ Other country |
| ☐ Djibouti | ☐ Libya | ☐ Saint Vincent and the Grenadines | |
| ☐ Dominica | ☐ Liechtenstein | ☐ Samoa | |

2. Analysis of technologies in the context of physical durability

*2.1 Contribution to physical durability

Do you want to contribute to section 9.2.1 of the working document on description of product technologies in the context of physical durability? This section of the questionnaire contains 24 main questions.

- ☐ Yes
- ☒ No, I want to skip this section of the questionnaire

3 Analysis of technologies in the context of repairability

*3.1 Contribution to repairability

Do you want to contribute to section 9.2.3 of the working document on description of product technologies in the context of repairability? This section of the questionnaire contains 1 main question.

- ☐ Yes
- ☒ No, I want to skip this section of the questionnaire

4. Analysis of technologies in the context of recycled content

*4.1 Contribution to recycled content

Do you want to contribute to section 9.2.5 of the working document on description of product technologies in the context of recycled content? This section of the questionnaire contains 1 main question.

- ☐ Yes
- ☒ No, I want to skip this section of the questionnaire

5. DOs not included in the model

*5.1 Contribution to design options not included in the model

Do you want to contribute to section 11.1 of the working document on design options not included in the model? This section of the questionnaire contains 10 main questions.

- ☐ Yes
- ☒ No, I want to skip this section of the questionnaire

6. DO1 on robustness

* 6.1 Contribution to design option on robustness (DO1)

Do you want to contribute to section 11.1.1 of the working document on design option about robustness? This section of the questionnaire contains 25 main questions.

- ☐ Yes
- ☒ No, I want to skip this section of the questionnaire

7. DO2 on recyclability

* 7.1 Contribution to design option on recyclability (DO2)

Do you want to contribute to section 11.1.2 of the working document on design option about recyclability? This section of the questionnaire contains 12 main questions.

- ☐ Yes
- ☒ No, I want to skip this section of the questionnaire

8. DO3 on recycled content

* 8.1 Contribution to design option on recycled content (DO3)

Do you want to contribute to section 11.1.3 of the working document on design option about recycled content? This section of the questionnaire contains 30 main questions.

- ☒ Yes
- ☐ No, I want to skip this section of the questionnaire

Questions about DO3 on recycled content

* 8.2 Reasons of proposing design option 3 (DO3) on recycled content

DO3 was proposed because the use of recycled fibres prevents the manufacturing and use of virgin fibres. This design option directly tackles the 60-63% of the lifecycle environmental impacts of the product. Lines 5497- 5500 report justifications and collect relevant information from previous sections. Based on the information and rationale provided at lines 5497- 5500, do you agree with the proposal of this design option?

- ☒ Yes, I agree
- ☐ Yes, I mostly agree
- ☐ No, I mostly disagree

- ☐ No, I disagree
- ☐ I do not know / I have no opinion

*8.2.1 Why?

Text of 1 to 5000 characters will be accepted

Recycling reduces the need for virgin materials and thus the environmental impacts associated with them.

*8.3 Source of recycled fibres

Regarding the types of waste from which the recycled fibers originate, they should include:

- ☐ Post-consumer textile waste only
- ☐ Post-industrial, pre- consumer and post-consumer textile waste
- ☒ Post-industrial, pre-consumer, post-consumer textile waste, and waste from other sectors (e.g. PET bottles)
- ☐ Others
- ☐ I have no opinion

*8.3.1 Why?

Text of 1 to 5000 characters will be accepted

In order to ensure extensive use of recycled fibres, the scope should be broad. However, the producers should be required to disclose the more specific of nature of the used fibre using the four categories presented in the answer option. This transparency would incentivise producers to transition towards closed-loop recycling.

*8.4 Availability of recycled cotton

Section 13.12 reports the assessment on the availability of the recycled cotton.

Do you agree with the assessment reported in Section 13.12 regarding the availability of recycled cotton?

- ☐ Yes, I agree
- ☐ Yes, I mostly agree
- ☐ No, I mostly disagree
- ☐ No, I disagree
- ☒ I do not know / I have no opinion

*8.5 Availability of the recycled nylon

Section 13.12 reports the assessment on the availability of the recycled nylon.

Do you agree with the assessment reported in Section 13.12 regarding the availability of recycled nylon?

- ☐ Yes, I agree
- ☐ Yes, I mostly agree
- ☐ No, I mostly disagree
- ☐ No, I disagree
- ☒ I do not know / I have no opinion

*8.6 Availability of the recycled polyester

Section 13.12 reports the assessment on the availability of the recycled polyester.

Do you agree with the assessment reported in Section 13.12 regarding the availability of recycled polyester?

- ☐ Yes, I agree
- ☐ Yes, I mostly agree
- ☐ No, I mostly disagree
- ☐ No, I disagree
- ☒ I do not know / I have no opinion

***8.7 Availability of the recycled wool**

Section 13.12 reports the assessment on the availability of the recycled wool.

Do you agree with the assessment reported in Section 13.12 for recycled wool?

- ☐ Yes, I agree
- ☐ Yes, I mostly agree
- ☐ No, I mostly disagree
- ☐ No, I disagree
- ☒ I do not know / I have no opinion

***8.8 Assumptions for knitted product category when only information requirements are assessed**

Lines 5577-5582 report the assumption made when only information requirements are considered.

Do you agree with the assumption that by only setting information requirements this would lead to an increase of secondary materials content equal to 2% of polyester, and 0.5% of nylon, wool and cotton?

- ☐ Yes, I agree
- ☐ Yes, I mostly agree
- ☐ No, I mostly disagree
- ☐ No, I disagree
- ☒ I do not know / I have no opinion

***8.9 Assumptions for denim product category when only information requirements are assessed**

Lines 5577-5582 report the assumption made when only information requirements are considered.

Do you agree with the assumption that by only setting information requirements this would lead to an increase of secondary materials content equal to 5% of cotton and 2% of polyester?

- ☐ Yes, I agree
- ☐ Yes, I mostly agree
- ☐ No, I mostly disagree
- ☐ No, I disagree
- ☒ I do not know / I have no opinion

***8.10 Assumptions for other woven product category when only information requirements are assessed**

Lines 5577-5582 report the assumption made when only information requirements are considered.

Do you agree that the adoption of only information requirements would result in an increase of secondary materials content equal to 2% of the polyester, and 0.5% of the nylon, wool and cotton?

- ☐ Yes, I agree
- ☐ Yes, I mostly agree
- ☐ No, I mostly disagree
- ☐ No, I disagree
- ☒ I do not know / I have no opinion

***8.11 Performance requirements on recycled content for knitted product category**Section

11.1.3 considers the following performance requirements for knitted product category:

- at least 5% of the nylon used in the product should be recycled material,
- at least 10% of the wool used in the product should be recycled material, and
- at least 15% of the polyester used in the product should be recycled material.

Do you agree with the adoption of these minimum limit values?

- ☐ Yes, I agree
- ☐ Yes, I mostly agree
- ☐ No, I mostly disagree
- ☐ No, I disagree
- ☒ I do not know / I have no opinion

***8.12 Performance requirements on recycled content for the denim product category**

Section 11.1.3 considers the following performance requirements for the denim product category: at least 20% of the cotton used in the product should be recycled material.

Do you agree with the adoption of this minimum limit value?

- ☐ Yes, I agree
- ☐ Yes, I mostly agree
- ☐ No, I mostly disagree
- ☐ No, I disagree
- ☒ I do not know / I have no opinion

***8.13 Performance requirements on recycled content for other woven product category**

Section 11.1.3 considers the following performance requirements for other woven product category:

- at least 5% of the nylon used in the product should be recycled material,
- at least 10% of the wool used in the product should be recycled material, and
- at least 15% of the polyester used in the product should be recycled material.

Do you agree with the adoption of these minimum limit values?



- Yes, I agree
- ☐ Yes, I mostly agree
- ☐ No, I mostly disagree
- ☐ No, I disagree
- ☒ I do not know / I have no opinion

***8.14 Assumptions for knitted product category when information and performance requirements are assessed**

Section 11.1.3 considers the following performance requirements for knitted product category:

- at least 5% of the nylon used in the product should be recycled material
- at least 10% of the wool used in the product should be recycled material
- at least 15% of the polyester used in the product should be recycled material

Do you agree with the assumption that an information requirement on recycled content in combination with a performance requirement would lead to an increase of secondary materials content by 5% as compared to the mentioned thresholds (i.e. resulting in 5.25% of the nylon, 10.5% of the wool, and 15.75% of the polyester)?

- ☐ Yes, I agree
- ☐ Yes, I mostly agree
- ☐ No, I mostly disagree
- ☐ No, I disagree
- ☒ I do not know / I have no opinion

***8.15 Assumptions for denim product category when information and performance requirements are assessed**

Section 11.1.3 considers the following performance requirements for the denim product category: at least 20% of the cotton used in the product should be recycled material

Do you agree with the assumption that an information requirement on recycled content in combination with a performance requirement would lead to an increase of secondary materials content by 5% as compared to the mentioned threshold (i.e. resulting in 21% of the cotton)?

- ☐ Yes, I agree
- ☐ Yes, I mostly agree
- ☐ No, I mostly disagree
- ☐ No, I disagree
- ☒ I do not know / I have no opinion

***8.16 Assumptions for other woven product category when information and performance requirements are assessed**

Section 11.1.3 considers the following performance requirements for recycled content for the other woven product category:

at least 5% of the nylon used in the product should be recycled material, at least 10% of the wool used in the product should be recycled material, and at least 15% of the polyester used in the product should be recycled material

Do you agree with the assumption that an information requirement on recycled content in combination with a performance requirement would lead to an increase of secondary materials content by 5% as compared to the mentioned thresholds (i.e. resulting in 5.25% of nylon, 10.5% of wool, and 15.75% of polyester)?

- ☐ Yes, I agree
- ☐ Yes, I mostly agree
- ☐ No, I mostly disagree
- ☐ No, I disagree
- ☒ I do not know / I have no opinion

*** 8.17 Additional parameters related to increased share of recycled fibres**

Would you propose additional parameters to model that relate to having an increased share of recycled fibres?

- ☐ Yes, I want to propose additional parameters
- ☐ No, I cannot propose additional parameters
- ☒ I have no opinion

*** 8.18 Price of recycled PET – an average value from the global market**

Table 81 reports that the price of recycled PET at global level is equal to 1.840 EUR/kg. The information was taken from [this source](#).

Do you agree with the adopted value and the use of its source?

- ☐ Yes, I agree
- ☐ Yes, I mostly agree
- ☐ No, I mostly disagree
- ☐ No, I disagree
- ☒ I do not know / I have no opinion

*** 8.19 Price of recycled PET – an average value from Chinese producers**

Table 81 reports that the price of recycled PET from the Chinese market is equal to 1.068 EUR/kg. The information was elaborated from [this source](#) and [this source](#).

Do you agree with the adopted value and the use of its sources?

- ☐ Yes, I agree
- ☐ Yes, I mostly agree
- ☐ No, I mostly disagree
- ☐ No, I disagree
- ☒ I do not know / I have no opinion

*** 8.20 Price of recycled PET – an average value from EU producers**

Table 81 reports that the price of recycled PET from the EU market is equal to 2.430 EUR/kg. The information was taken from [this source](#).

Do you agree with the adopted value and the use of its sources?

- ☐ Yes, I agree
- ☐ Yes, I mostly agree
- ☐ No, I mostly disagree
- ☐ No, I disagree
- ☒ I do not know / I have no opinion

* 8.21 Price of recycled polyamide – an average value from non-EU producers

Table 81 reports that the price of recycled polyamide from non-EU producers is equal to 3.375 EUR/kg. The information was taken from [this source](#).

Do you agree with the adopted value and the use of its sources?

- ☐ Yes, I agree
- ☐ Yes, I mostly agree
- ☐ No, I mostly disagree
- ☐ No, I disagree
- ☒ I do not know / I have no opinion

* 8.22 Price of recycled polyamide – an average value from EU producers

Table 81 reports that the price of recycled polyamide from EU producers is equal to 3.375 EUR/kg. The information was elaborated from [this source](#) and [this source](#).

Do you agree with the adopted value and the use of its sources?

- ☐ Yes, I agree
- ☐ Yes, I mostly agree
- ☐ No, I mostly disagree
- ☐ No, I disagree
- ☒ I do not know / I have no opinion

* 8.23 Price of recycled cotton – an average value from non-EU producers

Table 81 reports that the price of recycled cotton from non-EU producers is equal to 2.648 EUR/kg. The information was elaborated from [this source](#) and Khan et al. (2025).

Do you agree with the adopted value and the use of its sources?

- ☐ Yes, I agree
- ☐ Yes, I mostly agree
- ☐ No, I mostly disagree
- ☐ No, I disagree
- ☒ I do not know / I have no opinion

* 8.24 Price of recycled cotton – an average value from EU producers

Table 81 reports that the price of recycled cotton from EU producers is equal to 2.693 EUR/kg. The information was elaborated from [this source](#).

Do you agree with the adopted value and the use of its sources?

- ☐ Yes, I agree
- ☐ Yes, I mostly agree

- ☐ No, I mostly disagree
- ☐ No, I disagree
- ☒ I do not know / I have no opinion

* 8.25 Price of recycled wool – an average value from non-EU producers

Table 81 reports that the price of recycled wool from non-EU producers is equal to 3.560 EUR/kg. The information was elaborated from [this source](#).

Do you agree with the adopted value and the use of its sources?

- ☐ Yes, I agree
- ☐ Yes, I mostly agree
- ☐ No, I mostly disagree
- ☐ No, I disagree
- ☒ I do not know / I have no opinion

* 8.26 Price of recycled wool – an average value from EU producers

Table 81 reports that the price of recycled wool from EU producers is equal to 3.560 EUR/kg. The information was elaborated from [this source](#).

Do you agree with the adopted value and the use of its sources?

- ☐ Yes, I agree
- ☐ Yes, I mostly agree
- ☐ No, I mostly disagree
- ☐ No, I disagree
- ☒ I do not know / I have no opinion

* 8.27 Costs of labelling in DO3

At lines 5592- 5595, it is reported that an additional cost of labelling is considered and estimated to be of 0.02 €/unit.

Do you agree that the additional cost of labelling is equal to 0.02 €/unit?

- ☐ Yes, I agree
- ☐ Yes, I mostly agree
- ☐ No, I mostly disagree
- ☐ No, I disagree
- ☒ I do not know / I have no opinion

* 8.28 Costs of certification in DO3

At lines 5596- 5602, it is reported that an additional cost of certification is considered and estimated to be of 0.13 €/unit. This cost refers to a certification based on a chain of custody system that is capable to demonstrate that a specific quantity of fibre in the final product is a recycled material coming from a specific type of textile waste, i.e. post-industrial, pre-consumer, and post-consumer.

Do you agree that the calculated cost of certification is equal to 0.13 €/unit?

- ☐ Yes, I agree
- ☐ Yes, I mostly agree

- ☐ No, I mostly disagree
- ☐ No, I disagree
- ☒ I do not know / I have no opinion

* 8.29 Additional costs related to DO3

Would you propose additional costs to be considered related to the design option 3 (DO3) on recycled content?

- ☐ Yes, I want to propose additional costs
- ☐ No, I cannot propose additional costs
- ☒ I have no opinion

* 8.30 Influence of the Extended Producer Responsibility on recycled content

Extended Producer Responsibility (EPR) schemes required under the Waste Framework Directive could incentivise designing products with higher recycled content.

Do you think that EPR fee modulation based on the quantity of recycled material will increase the use of products with increased recycled content?

- ☐ Yes, it will
- ☐ Yes, it mostly will
- ☐ No, it mostly will not
- ☐ No, it will not
- ☒ I do not know / I have no opinion

* 8.31 EPR scheme and the calculation of recycled content

Should the EPR fee modulation be based on:

- ☐ The overall amount of recycled content present in the product
- ☐ The recycled content in the product sourced from European post-consumer textile waste
- ☒ Other

* 8.31.1 Please specify what other options would you consider to define the EPR fee modulation for the recycled content

Text of 1 to 5000 characters will be accepted

no opinion on the issue

Finalization of **Part 1 of 2** of the questionnaire

Your opinion matters to us.

Thank you very much for taking the time to contribute to

Part 1 of 2 of this consultation.

Contact

[Contact Form](#)

Part 2 of 2 of the questionnaire on the working document: Preparatory study on textiles for product policy instruments - 3rd milestone

Fields marked with * are mandatory.

Introduction

Context of the questionnaire

Welcome to the **Part 2 of 2** of the questionnaire that will allow you to contribute to the development of the [preparatory study on textile products](#).

Deadline for submission of answers and comments: **30 March 2026** at 23:59 CET.

On 16 December 2025, the Joint Research Centre (JRC) of the European Commission shared with all registered stakeholders the [working document of the 3rd milestone](#).

On 14 and 15 January 2026, registered stakeholders and the JRC exchanged ideas during an online workshop about Tasks 4, 5 and 6 of the working document.

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- verify the work done to date,
- collect additional evidence on the investigated topics.

Structure of the Part 2 of 2 of the questionnaire

Part 2 of 2 of the questionnaire has 7 sections:

1. Profile of the respondent
9. DO4 on environmental and carbon footprint
10. Combination of design options: paths
11. Chemical substances in textile products
12. Environmental and economic model
13. Questions related to future stages of the project
14. Other parts of the working document

The questionnaire is designed and implemented in a way that should enable stakeholders to easily identify the sections they wish to comment, allowing them to skip those sections which they do not wish to comment.

Section 14 of Part 2 of 2 of the questionnaire further allows all registered stakeholders to provide up to 10 written comments to the working document on topics not otherwise specifically covered in the questionnaire. Should you wish to provide more than 10 comments, you are welcome to **submit more than one questionnaire**. If you wish to share a document to support your position further, you may do so by sending it via email to **JRC-B5-TEXTILES@ec.europa.eu**, clearly indicating if the submitted information should be treated as confidential. Please note that comments made in Section 14 of Part 2 of 2 of the questionnaire or documents sent via email should not reiterate or substitute the answers on topics asked in other sections of the questionnaire. We would be grateful if you can support the JRC in analysing the comments received by using to the maximum extent possible the structured questionnaire provided.

Confidentiality of personal data and information provided

Data and information collected via this questionnaire will be treated confidentially and complying with the Regulation on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data ([Regulation \(EU\) 2018/1725](#)).

Therefore, data will be treated for the development of EU policies on textiles, and it will be of the exclusive use of the European Commission. The European Commission will process data and information complying with the referred regulation. For more information, please visit the privacy statement under [this link](#) (processing of personal data for user management purposes) and [this link](#) (processing personal data within the survey itself).

1. Profile of the respondent

	First name	Last name	Email address
. *	Lasse	Leipola	lasse.leipola@finnwatch.org

* Publication of information in my contribution

- ☒ I **consent** to the publication, by the European Commission's JRC, of any information in my contribution, in whole or in part (which may include quotes or opinions I express), provided that the personal information submitted under "stakeholder information" is not disclosed. Publication of the information may include publication in aggregated or disaggregated form of your contributions in JRC intermediate deliverables or final reports that may be made publicly available via the JRC's [project website](#).
- ☐ I do **not consent** to the publication of any information in my contribution.

☒ I guarantee that:

- My response does not infringe any intellectual property rights, including without limitation, copyright, database sui generis rights or trademark rights or any other third party rights;
- To the extent that my response contains materials from other sources (e.g., text, illustrations, graphs, tables), I have obtained written permission from the relevant copyright owners to include such materials in my response, in a way that allows the European Commission to publish my response;
- I can provide copies of any relevant written permissions/licences, at the request of the European Commission; If my response contains materials made available under an open licence (e.g. Creative Commons), I indicate the type of licence, together with the source and author's name, in my response;
- Nothing in my response is obscene, defamatory, violates any right of privacy or duty of confidentiality, infringes any other rights of any person or entity or is otherwise unlawful.

* **1.1 Name of the submitting organization**

What is the name of the organization you represent in this questionnaire?

Text of 1 to 300 characters will be accepted

Finnwatch

* **1.2 Type of the organization**

Select the type of organization you represent in this questionnaire:

- ☐ Government (e.g. Member States, regions, EU Ecolabel competent bodies, national and regional agencies, etc.)
- ☐ Textile industry
- ☐ Textile industrial association
- ☐ Waste management industry
- ☐ Waste management industry association
- ☐ Consumer organization
- ☐ Environmental Non-governmental organization (NGO)
- ☒ Other Non-governmental organization (NGO)
- ☐ Research institutions, including universities
- ☐ Test laboratory
- ☐ Other

* **1.3 Country of the organization**

Select the country of the organization you represent in this questionnaire:

- | | | | |
|--|--|--|--|
| ☐ Afghanistan | ☐ Dominican Republic | ☐ Lithuania | ☐ San Marino |
| ☐ Albania | ☐ Ecuador | ☐ Luxembourg | ☐ Sao Tome and Principe |
| ☐ Algeria | ☐ Egypt | ☐ Madagascar | ☐ Saudi Arabia |
| ☐ Andorra | ☐ El Salvador | ☐ Malawi | ☐ Senegal |
| ☐ Angola | ☐ Equatorial Guinea | ☐ Malaysia | ☐ Serbia |
| ☐ Antigua and Barbuda | ☐ Eritrea | ☐ Maldives | ☐ Seychelles |
| ☐ Argentina | ☐ Estonia | ☐ Mali | ☐ Sierra Leone |
| ☐ Armenia | ☐ Eswatini | ☐ Malta | ☐ Singapore |
| ☐ Australia | ☐ Ethiopia | ☐ Marshall Islands | ☐ Slovakia |
| ☐ Austria | ☐ Fiji | ☐ Mauritania | ☐ Slovenia |
| ☐ Azerbaijan | ☒ Finland | ☐ Mauritius | ☐ Solomon Islands |
| ☐ Bahamas | ☐ France | ☐ Mexico | ☐ Somalia |
| ☐ Bahrain | ☐ Gabon | ☐ Micronesia | ☐ South Africa |
| ☐ Bangladesh | ☐ Gambia | ☐ Monaco | ☐ South Korea |
| ☐ Barbados | ☐ Georgia | ☐ Mongolia | ☐ South Sudan |
| ☐ Belarus | ☐ Germany | ☐ Montenegro | ☐ Spain |
| ☐ Belgium | ☐ Ghana | ☐ Morocco | ☐ Sri Lanka |
| ☐ Belize | ☐ Greece | ☐ Mozambique | ☐ Sudan |
| ☐ Benin | ☐ Grenada | ☐ Myanmar | ☐ Suriname |
| ☐ Bhutan | ☐ Guatemala | ☐ Namibia | ☐ Sweden |
| ☐ Bolivia | ☐ Guinea | ☐ Nauru | ☐ Switzerland |
| ☐ Bosnia and Herzegovina | ☐ Guinea Bissau | ☐ Nepal | ☐ Syrian Arab Republic |
| ☐ Botswana | ☐ Guyana | ☐ Netherlands | ☐ Tajikistan |
| ☐ Brazil | ☐ Haiti | ☐ New Zealand | ☐ Tanzania |
| ☐ Brunei Darussalam | ☐ Honduras | ☐ Nicaragua | ☐ Thailand |
| ☐ Bulgaria | ☐ Hungary | ☐ Niger | ☐ Timor-Leste |
| ☐ Burkina Faso | ☐ Iceland | ☐ Nigeria | ☐ Togo |
| ☐ Burundi | ☐ India | ☐ North Korea | ☐ Tonga |
| ☐ Cabo Verde | ☐ Indonesia | ☐ North Macedonia | ☐ Trinidad and Tobago |
| ☐ Cambodia | ☐ Iran | ☐ Norway | ☐ Tunisia |
| ☐ Cameroon | ☐ Iraq | ☐ Oman | ☐ Turkmenistan |
| ☐ Canada | ☐ Ireland | ☐ Pakistan | ☐ Tuvalu |
| ☐ Central African Republic | ☐ Israel | ☐ Palau | ☐ Türkiye |
| ☐ Chad | ☐ Italy | ☐ Panama | ☐ Uganda |
| ☐ Chile | ☐ Jamaica | ☐ Papua New Guinea | ☐ Ukraine |
| ☐ China | ☐ Japan | ☐ Paraguay | ☐ United Arab Emirates |
| ☐ Colombia | ☐ Jordan | ☐ Peru | ☐ United Kingdom |
| ☐ Comoros | ☐ Kazakhstan | ☐ Philippines | ☐ United States of America |
| ☐ Congo | ☐ Kenya | ☐ Poland | ☐ Uruguay |

- | | | | |
|--|-------------------------------------|--|-------------------------------------|
| ☐ Costa Rica | ☐ Kiribati | ☐ Portugal | ☐ Uzbekistan |
| ☐ Croatia | ☐ Kuwait | ☐ Qatar | ☐ Vanuatu |
| ☐ Cuba | ☐ Kyrgyzstan | ☐ Republic of Moldova | ☐ Venezuela |
| ☐ Cyprus | ☐ Laos | ☐ Romania | ☐ Viet Nam |
| ☐ Czechia | ☐ Latvia | ☐ Russian Federation | ☐ Yemen |
| ☐ Côte D'Ivoire | ☐ Lebanon | ☐ Rwanda | ☐ Zambia |
| ☐ Democratic Republic of the Congo | ☐ Lesotho | ☐ Saint Kitts and Nevis | ☐ Zimbabwe |
| ☐ Denmark | ☐ Liberia | ☐ Saint Lucia | ☐ Other country |
| ☐ Djibouti | ☐ Libya | ☐ Saint Vincent and the Grenadines | |
| ☐ Dominica | ☐ Liechtenstein | ☐ Samoa | |

9. DO4 on environmental or carbon footprint

*9.1 Contribution to design option on environmental or carbon footprint (DO4)

Do you want to contribute to section 11.1.4 of the working document on design option about environmental or carbon footprint? This section of the questionnaire contains 29 main questions.

- ☒ Yes
- ☐ No, I want to skip this section of the questionnaire

Questions about DO4 on environmental or carbon footprint

*9.2 Consequences of the information requirement on product footprint

Do you think an information requirement on product footprint would:

- ☒ Significantly decrease the footprint of the textile apparel, e.g. because consumers and manufacturers would choose and produce less impactful products, respectively.
- ☐ Somewhat decrease the footprint of the textile apparel.
- ☐ Have no effect on the environmental impact of textile apparel.
- ☐ I have no opinion.

*9.2.1 Why?

Text of 1 to 5000 characters will be accepted

We support the requirement as the calculation of the footprint can help producers to recognise relevant emission sources, which supports their emission reduction efforts. However, it should also be acknowledged that carbon footprint accounting can also broadly support the EU policy and climate targets beyond the scope of ecodesign regulation. It, for example, supports the organizational GHG accounting and reporting (under the CSRD) and may in future enable footprint-based policy measures such as product-level carbon taxes. Finnish government study from 2023 identified immature carbon footprint accounting as a key obstacle for product-level carbon taxes: <https://julkaisut.valtioneuvosto.fi/items/20b3faf0-88e3-461b-93b4-05e13ff7ee2a>

*9.3 Environmental footprint addressing LC2

DO4 was proposed as an environmental indicator to (1) help consumers make informed purchases of less impactful products, and (2) encourage manufacturers to produce products with lower environmental impacts. DO4 focuses only on Life-Cycle Stage 2 (LCS2 - manufacturing) and addresses 20% of the total lifecycle impacts when the environmental footprint is chosen as environmental indicator – see lines 5659- 5662.

Do you agree with the use of the proposed environmental indicator that addresses 20% of the total lifecycle impacts?

- ☐ Yes, I agree
- ☐ Yes, I mostly agree
- ☐ No, I mostly disagree
- ☒ No, I disagree
- ☐ I do not know / I have no opinion

*9.3.1 Why?

Text of 1 to 5000 characters will be accepted

An indicator based on just LCS2 can be misleading and LCS1 should be included as well.

*9.4 Carbon footprint addressing LC2

DO4 was proposed as an environmental indicator to (1) help consumers make informed purchases of less impactful products, and (2) encourage manufacturers to produce products with lower environmental impacts. DO4 focuses only on LCS2 (manufacturing) and addresses 6% of the total lifecycle impacts when the carbon footprint is chosen as environmental indicator. It addresses the most impactful category in that lifecycle stage (LCS2) – see lines 5659-5662.

Do you agree with the use of an environmental indicator that addresses the most impactful category of the manufacturing stage (LCS2), representing 6% of the total lifecycle impacts?

- ☐ Yes, I agree
- ☐ Yes, I mostly agree
- ☐ No, I mostly disagree
- ☒ No, I disagree
- ☐ I do not know / I have no opinion

*9.4.1 Why?

Text of 1 to 5000 characters will be accepted

An indicator based on just LCS2 can be misleading and LCS1 should be included as well.

*9.5 Choice of an environmental indicator

Many indicators (single or aggregated) can be chosen as environmental indicator of a product's footprint.

The Life Cycle Assessment (LCA) reported in section 10.1 provides a useful and holistic analysis of most of the impacts generated due to the consumption of the three representative products in scope. In particular, the contribution analysis reported in section 10.1.2 details the contribution to the total lifecycle impacts of impact categories, Life-Cycle Stages (LCSs) and other contributing factors, such as energy and chemicals use. In your opinion, what is the percentage of the total lifecycle impacts that the chosen environmental indicator should address?

- ☐ At least 5%
- ☐ At least 10%
- ☐ At least 20%
- ☐ At least 30%
- ☐ At least 40%
- ☐ At least 50%
- ☐ At least 60%
- ☐ At least 70%
- ☐ At least 80%
- ☐ At least 90%
- ☐ It should address the whole lifecycle impacts
- ☒ I have no opinion

* 9.6 Dataset bias in LCS1

Lines 5668-5673 describe the reason of excluding Life-Cycle Stage 1 (LCS1) from DO4.

Do you agree that the datasets available for the environmental assessment of the several fibre types do not allow their fair comparison?

- ☐ Yes, I agree
- ☐ Yes, I mostly agree
- ☒ No, I mostly disagree
- ☐ No, I disagree
- ☐ I do not know / I have no opinion

* 9.6.1 Why?

Text of 1 to 5000 characters will be accepted

While we haven't conducted an independent analysis of the datasets, inadequacy of current datasets should not be a justification for exclusion of significant emissions. Use of fixed emission factors or benchmarks would be preferable to limiting the scope to LC2.

* 9.7 Inclusion of any other life-cycle stage (LCS)

Would you propose the inclusion of any other LCS?

- ☐ No, only LCS2 (manufacturing)
- ☐ Yes, the indicator should include LCS1 (raw materials) and LCS2 (manufacturing)
- ☒ Yes, the indicator should include LCS1 (raw materials), LCS2 (manufacturing) and LCS3 (distribution)
- ☐ Yes, the indicator should include LCS1 (raw materials), LCS2 (manufacturing), LCS3 (distribution) and LCS4 (use)

- ☐ Yes, the indicator should include LCS1 (raw materials), LCS2 (manufacturing), LCS3 (distribution) and LCS4 (use) and LCS5 (end of life)
- ☐ Other
- ☐ I do not know / I have no opinion

*9.7.2 Why?

Text of 1 to 5000 characters will be accepted

Selection of raw materials is an crucial design option that manufacturer can use to decrease their emissions. This possibility should not be hidden by exclusion.

*9.8 Methodology for the environmental indicator

What do you consider is the most suitable methodology to build the environmental indicator for the products in scope?

- ☐ Environmental footprint based on the PEFCR
- ☒ Carbon footprint based on the PEFCR
- ☐ Other
- ☐ I have no opinion

*9.8.2 Why?

Text of 1 to 5000 characters will be accepted

PEFCR is the European standard that should be used. While other environmental impacts should not be neglected, the carbon footprint should be the primary requirement.

*9.9 Environmental benchmark based on the PEFCR

At lines 5687-5706, the use of a benchmark based on PEFCR is described. An excellence label could be attributed to products where the manufacturer demonstrates that their environmental / carbon footprint associated to manufacturing is better than the benchmark set by the PEFCR for the representative product in that product category, indicating also the improvement (in %) with respect to the benchmark value. The JRC's proposal does not require economic operators to disclose the environmental / carbon footprint of the product. It is proposed as voluntary information to be disclosed by those willing to indicate excellence in their performance.

Do you agree with this proposal?

- ☐ Yes, I agree
- ☐ Yes, I mostly agree
- ☒ No, I mostly disagree
- ☐ No, I disagree
- ☐ I do not know / I have no opinion

*9.9.1 Why?

Text of 1 to 5000 characters will be accepted

Carbon footprint should be required as a mandatory disclosure.

*9.10 Communicating the environmental indicator

At lines 5687-5706, the use of a label indicating improved performance with respect to a benchmark based on PEFCR is described. In this option the chosen environmental indicator would be expressed via an excellence label that additionally informs about the numerical value of the indicator, expressed in the relevant units:

- The carbon footprint would be expressed as CO2 equivalent,
- The environmental footprint would be expressed as environmental points.

If an environmental indicator would be used, do you agree with disclosing on a label only the numerical value of the environmental indicator expressed in the referred units?

- ☐ Yes, I agree
- ☐ Yes, I mostly agree
- ☒ No, I mostly disagree
- ☐ No, I disagree
- ☐ I do not know / I have no opinion

*9.10.1 Why? What would be the advantages as well as the limitations and drawbacks?

Text of 1 to 5000 characters will be accepted

Carbon footprint should also be required in addition to reference points.

*9.11 Footprint information and increased costs

Section 6.2 reports that consumers prioritise purchases based on price, perceived quality and fit. Consumers express their concern on environmental impacts, but it is unknown how much more they are willing to pay for products less impactful on the environment.

Do you agree with introducing an information requirement on environmental or carbon footprint, despite an increase in costs to operators and users?

- ☒ Yes, I agree
- ☐ Yes, I mostly agree
- ☐ No, I mostly disagree
- ☐ No, I disagree
- ☐ I do not know / I have no opinion

*9.11.1 Why?

Text of 1 to 5000 characters will be accepted

Carbon footprint is essential information.

9.11.2 What increase in cost would you consider acceptable?

- ☐ Up to 2%
- ☐ Up to 4%
- ☐ Up to 6%

- ☐ Up to 8%
- ☐ Up to 10%
- ☐ Up to 20%
- ☐ Up to 30%
- ☐ Up to 40%
- ☐ Up to 50%
- ☐ Up to 60%
- ☐ Up to 70%
- ☐ Up to 80%
- ☐ Up to 90%
- ☐ Up to 100%
- ☐ More than 100%
- ☒ I have no opinion

***9.12 Assumptions about the effects of introducing a voluntary information requirement on environmental footprint for products performing above a certain benchmark (DO4.1)**

Lines 5710- 5730 report the assumption made on the effect of using a voluntary information requirement on environmental footprint addressing the manufacturing stage (LCS2). We here refer to DO4.1.

Do you agree that the adoption of a voluntary information requirement disclosing the environmental footprint would result in a decrease of the environmental footprint of the representative products equal to 3%?

- ☐ Yes, I agree
- ☐ Yes, I mostly agree
- ☐ No, I mostly disagree
- ☐ No, I disagree
- ☒ I do not know / I have no opinion

***9.13 Assumptions about the effects of introducing a voluntary information requirement on carbon footprint for products performing above a certain benchmark (DO4.2)**

Lines 5710- 5730 report the assumption made on the effect of using a voluntary information requirement on carbon footprint addressing the manufacturing stage (LCS2). We here refer to DO4.2.

Do you agree that the adoption of a voluntary information requirement disclosing the carbon footprint would allow a decrease of the carbon footprint of the representative products equal to 3%?

- ☐ Yes, I agree
- ☐ Yes, I mostly agree
- ☐ No, I mostly disagree
- ☐ No, I disagree
- ☒ I do not know / I have no opinion

***9.14 Costs of labelling in DO4**

At lines 5731- 5734, it is reported that an additional cost of labelling is considered and estimated to be of 0.02 €/unit.

Do you agree that the additional cost of labelling is equal to 0.02 €/unit?

- ☐ Yes, I agree
- ☐ Yes, I mostly agree
- ☐ No, I mostly disagree
- ☐ No, I disagree
- ☒ I do not know / I have no opinion

***9.15 Administrative costs of DO4**

Lines 5735- 5780 describe the administrative costs for the implementation of DO4.

The authors highlight that estimation of the administrative costs should include the verification of two types of information:

(a) The input data (primary or secondary data) from specific industrial sites, which are representative of the supply chain of the specific product model described. The representativeness of input data should be documented and verified.

(b) The correct application of the PEFCR framework.

Do you agree that these are the only costs to be included?

- ☐ Yes, I agree
- ☐ Yes, I mostly agree
- ☐ No, I mostly disagree
- ☐ No, I disagree
- ☒ I do not know / I have no opinion

***9.16 Administrative costs in DO4.1**

Lines 5735- 5780 describe the administrative costs to implement DO4. Due to lack of more specific information, the current version of the preparatory study refers to estimates reported in the impact assessment carried out in support of Regulation (EU) 2023/1542 concerning carbon footprint thresholds for industrial and EV batteries.

Lines 5744- 5746 report the estimates for initial costs equal to EUR 2 550 per model and a verification cost equal to EUR 4 500 per model.

These estimates were used to account for the documentation and verification of the requirement on the environmental footprint (DO4.1), regardless of whether primary or secondary data are used.

Do you agree with these estimates?

Please in your answer, consider all the costs you think should be included for documenting and verifying DO4.

1.

- ☐ Yes, I agree
- ☐ Yes, I mostly agree
- ☐ No, I mostly disagree
- ☐ No, I disagree
- ☒ I do not know / I have no opinion

*9.17 Administrative costs in DO4.2

Lines 5735- 5780 describe the administrative costs for the implementation of DO4. Due to lack of more specific information, the current version of the preparatory study refers to estimates reported in the impact assessment carried out in support of Regulation (EU) 2023/1542 concerning carbon footprint thresholds for industrial and EV batteries.

Lines 5744- 5746 report the estimates for initial costs equal to EUR 2 550 per model and a verification cost equal to EUR 4 500 per model.

These estimates were used to account for the documentation and verification of the requirement on the carbon footprint (DO4.2), regardless of whether primary or secondary data were used.

Do you agree with these estimates?

Please in your answer, consider all the costs you think should be included for documenting and verifying DO4.

2.

- ☐ Yes, I agree
- ☐ Yes, I mostly agree
- ☐ No, I mostly disagree
- ☐ No, I disagree
- ☒ I do not know / I have no opinion

*9.18 Administrative costs per unit of knitted products in DO4.1

Lines 5735- 5780 describe the administrative costs for the implementation of DO4. Due to lack of more specific information, the current version of the preparatory study refers to estimates reported in the impact assessment carried out in support of Regulation (EU) 2023/1542 concerning carbon footprint thresholds for industrial and EV batteries.

Lines 5749- 5757 report that the estimated cost per unit of knitted product is equal to EUR 0.07.

Do you agree that this cost estimate covers all upstream costs incurred to comply with the disclosure required by DO4.1?

- ☐ Yes, I agree
- ☐ Yes, I mostly agree
- ☐ No, I mostly disagree
- ☐ No, I disagree
- ☒ I do not know / I have no opinion

*9.19 Administrative costs per unit of knitted products in DO4.2

Lines 5735- 5780 describe the administrative costs for the implementation of DO4. Due to lack of more specific information, the current version of the preparatory study refers to estimates reported in the impact assessment carried out in support of Regulation (EU) 2023/1542 concerning carbon footprint thresholds for industrial and EV batteries.

Lines 5749- 5757 report that the estimated cost per unit of knitted product is equal to EUR 0.07.

Do you agree that this cost estimate covers all upstream costs incurred to comply with the disclosure required by DO4.2?

- ☐ Yes, I agree
- ☐ Yes, I mostly agree

- ☐ No, I mostly disagree
- ☐ No, I disagree
- ☒ I do not know / I have no opinion

*9.20 Administrative costs per unit of denim products in DO4.1

Lines 5735- 5780 describe the administrative costs for the implementation of DO4. Due to lack of more specific information, the current version of the preparatory study refers to estimates reported in the impact assessment carried out in support of Regulation (EU) 2023/1542 concerning carbon footprint thresholds for industrial and EV batteries.

Lines 5749- 5757 report that the estimated cost per unit of denim product is equal to EUR 0.14.

Do you agree that this cost estimate covers all upstream costs incurred to comply with the disclosure required by DO4.1?

- ☐ Yes, I agree
- ☐ Yes, I mostly agree
- ☐ No, I mostly disagree
- ☐ No, I disagree
- ☒ I do not know / I have no opinion

*9.21 Administrative costs per unit of denim products in DO4.2

Lines 5735- 5780 describe the administrative costs for the implementation of DO4. Due to lack of more specific information, the current version of the preparatory study refers to estimates reported in the impact assessment carried out in support of Regulation (EU) 2023/1542 concerning carbon footprint thresholds for industrial and EV batteries.

Lines 5749- 5757 report that the estimated cost per unit of denim product is equal to EUR 0.14.

Do you agree that this cost estimate covers all upstream costs incurred to comply with the disclosure required by DO4.2?

- ☐ Yes, I agree
- ☐ Yes, I mostly agree
- ☐ No, I mostly disagree
- ☐ No, I disagree
- ☒ I do not know / I have no opinion

*9.22 Administrative costs per unit of other woven products in DO4.1

Lines 5735- 5780 describe the administrative costs for the implementation of DO4. Due to lack of more specific information, the current version of the preparatory study refers to estimates reported in the impact assessment carried out in support of Regulation (EU) 2023/1542 concerning carbon footprint thresholds for industrial and EV batteries.

Lines 5749- 5757 report that the estimated cost per unit of other woven product is equal to EUR 0.09.

Do you agree that this cost estimate covers all upstream costs incurred to comply with the disclosure required by DO4.1?

- ☐ Yes, I agree
- ☐ Yes, I mostly agree

- ☐ No, I mostly disagree
- ☐ No, I disagree
- ☒ I do not know / I have no opinion

*9.23 Administrative costs per unit of other woven products in DO4.2

Lines 5735- 5780 describe the administrative costs for the implementation of DO4. Due to lack of more specific information, the current version of the preparatory study refers to estimates reported in the impact assessment carried out in support of Regulation (EU) 2023/1542 concerning carbon footprint thresholds for industrial and EV batteries.

Lines 5749- 5757 report that the estimated cost per unit of other woven product is equal to EUR 0.09.

Do you agree that this cost estimate covers all upstream costs incurred to comply with the disclosure required by DO4.2?

- ☐ Yes, I agree
- ☐ Yes, I mostly agree
- ☐ No, I mostly disagree
- ☐ No, I disagree
- ☒ I do not know / I have no opinion

*9.24 Uptake of the voluntary disclosure of information in DO4

Lines 5758- 5763 report the estimated level of uptake by the market of the voluntary reporting of the product footprint proposed in DO4.

Do you agree that 50% of the product models placed on the EU market would disclose this voluntary information?

- ☐ Yes, I agree
- ☐ Yes, I mostly agree
- ☐ No, I mostly disagree
- ☒ No, I disagree
- ☐ I do not know / I have no opinion

*9.24.1 Why?

Text of 1 to 5000 characters will be accepted

Voluntary disclosure is already an option, but it is still quite uncommon. Promoting such option in the ecodesign framework could improve things, but 50% adoption rate seems unlikely as some major producers do not even report their emissions on an organizational level.

*9.24.2 Please specify any alternative values you may propose, together with their rationale.

Text of 1 to 5000 characters will be accepted

We do not have alternative value, but 50% seems too high.

*9.24.3 What is the source of your proposal?

- ☐ Technical evidence that could be made available to JRC
- ☐ Expert judgement based on direct experience
- ☒ Expert opinion that is neither based on technical evidence nor direct experience
- ☐ Other

*9.25 Additional costs related to DO4

Would you propose any additional costs to be considered related to design option 4 (DO4) on product footprint?

- ☐ Yes, I want to propose additional costs
- ☐ No, I cannot propose additional costs
- ☒ I have no opinion

*9.26 Voluntary information requirement for DO4

Lines 5699-5701 propose that the disclosure of information regarding the environmental indicator – environmental or carbon footprint – should be voluntary. This means that the manufacturers would not need to calculate their footprints if they did not want to be attributed the excellence label that would indicate that they perform better than the average. Do you agree that this calculation should be voluntary?

- ☐ Yes, I agree
- ☐ Yes, I mostly agree
- ☐ No, I mostly disagree
- ☒ No, I disagree
- ☐ I do not know / I have no opinion

*9.26.1 Why?

Text of 1 to 5000 characters will be accepted

Footprint should be required.

*9.27 Use of primary and secondary data for the information requirement in DO4

Lines 5702 -5703 indicate that the proposed environmental indicator – environmental or carbon footprint – can be calculated based on primary or secondary data and that a label would be used to inform about the type of data used. This means that the manufacturer would need to adjust their inventory and then use the default average (secondary) or real (primary) data to quantify the impacts.

Would you support the use of:

- ☐ Only primary data
- ☐ Only secondary data
- ☒ Both primary and secondary data following the directions reported in the PEFCR framework
- ☐ Other
- ☐ I do not know / I have no opinion

*9.27.1 Why?

Text of 1 to 5000 characters will be accepted

The requirement to use only primary data may be too strict. Approach in the PEFCR framework, which directs to use certain secondary datasets and where the use of primary data is encouraged with quality scores, is preferable.

*9.27.2 Incentivising the use of primary data

Would you agree with the current proposal of using a label to inform about whether the environmental indicator has been calculated using secondary data or primary data?

- ☐ Yes, I agree
- ☐ Yes, I mostly agree
- ☐ No, I mostly disagree
- ☐ No, I disagree
- ☒ I do not know / I have no opinion

*9.28 Classes of performance on DO4

Lines 5699-5701 propose the voluntary information disclosure of the environmental indicator – environmental or carbon footprint.

Classes of performance are a structured categorisation that translates a product's performance on a single key parameter (e.g. carbon footprint), or an aggregated single score (e.g. environmental footprint), into clear bands that are easy to compare. For example, considering 5 classes from A to E, with A being the best and E the worst.

Under the ESPR, they are used to benchmark and differentiate products, incentivise better-performing designs and communicate circularity and environmental performance on labels to guide customers' choices, while ensuring that the lowest class aligns with the minimum required performance.

Would you be in favour of proposing classes of performance on an environmental indicator disclosed in DO4?

- ☐ Yes, I would
- ☒ Yes, I mostly would
- ☐ No, I mostly would not
- ☐ No, I would not
- ☐ I do not know / I have no opinion

*9.28.1 Why?

Text of 1 to 5000 characters will be accepted

Classes would provide an accessible way for consumers to compare products. However, the absolute value for footprint should be presented as well.

*9.28.2 What would be the rationale to define these classes of performance? Based on what information could these be established?

Text of 1 to 5000 characters will be accepted

no opinion

* 9.28.3 What is the source of your proposal?

- ☐ Technical evidence that could be made available to JRC
- ☐ Expert judgement based on direct experience
- ☒ Expert opinion that is neither based on technical evidence nor direct experience
- ☐ Other

* 9.29 Mandatory information requirement for DO4

Lines 5699-5701 propose the voluntary information disclosure of the environmental indicator – environmental of carbon footprint.

Would you be in favour of setting a mandatory information requirement for DO4?

- ☒ Yes, I would
- ☐ Yes, I mostly would
- ☐ No, I mostly would not
- ☐ No, I would not
- ☐ I do not know / I have no opinion

* 9.29.1 Why?

Text of 1 to 5000 characters will be accepted

Requirement to disclose the carbon footprint would help consumers to select low-emission products and incentivise producers to reduce their impact.

* 9.30 Mandatory performance requirement for DO4

Lines 5699-5701 propose the voluntary information disclosure of the environmental indicator – environmental of carbon footprint.

Alternatively, in case an information requirement would be set, would you be in favour of also setting a performance requirement for DO4?

- ☒ Yes, I would
- ☐ Yes, I mostly would
- ☐ No, I mostly would not
- ☐ No, I would not
- ☐ I do not know / I have no opinion

* 9.30.1 Why?

Text of 1 to 5000 characters will be accepted

The requirements should aim to close the European market from the most harmful products. The performance requirement could be implemented gradually to avoid unnecessary market disruption.

* 9.30.2 Which limit value would you tentatively set as a threshold for each product category? Based on what information would you establish performance levels?

Text of 1 to 5000 characters will be accepted

***9.30.3 What is the source of your proposal?**

- ☐ Technical evidence that could be made available to JRC
- ☐ Expert judgement based on direct experience
- ☒ Expert opinion that is neither based on technical evidence nor direct experience
- ☐ Other

10. Combination of design options: paths

***10.1 Contribution to the combination of design options: paths**

Do you want to contribute to section 11.2 of the working document on combinations of design options? This section of the questionnaire contains 14 main questions.

- ☐ Yes
- ☒ No, I want to skip this section of the questionnaire

11. Chemical substances in textile products

***11.1 Contribution to substances of concern**

Do you want to contribute to section 12 of the working document on chemical substances in textile products? This section of the questionnaire contains 14 main questions.

- ☐ Yes
- ☒ No, I want to skip this section of the questionnaire

12. Environmental and economic model

***12.1 Contribution to environmental and economic model**

Do you want to contribute to section 13.11 of the working document on environmental and economic model? This section of the questionnaire contains 12 main questions.

- ☐ Yes
- ☒ No, I want to skip this section of the questionnaire

13. Questions related to future stages of the project

***13.1 Contribution to questions related to future stages of the project**

Do you want to contribute to questions related to future stages of the project? This section of the questionnaire contains 9 main questions.

- ☒ Yes
- ☐ No, I want to skip this section of the questionnaire

* 13.2 Extrinsic durability

This subject is out of scope of the JRC's Preparatory Study.

Would you support consideration of extrinsic durability in the delegated act on textile apparel?

- ☐ Yes, I agree
- ☒ Yes, I mostly agree
- ☐ No, I mostly disagree
- ☐ No, I disagree
- ☐ I do not know / I have no opinion

* 13.2.1 Why?

Text of 1 to 5000 characters will be accepted

This aspect should be further explored. Could there be additional requirements for the durability of fasteners or seams?

* 13.2.2 In your view, how should the extrinsic durability of a product be determined?

Text of 1 to 5000 characters will be accepted

see above

13.3 Score of a product

This subject is out of scope of the JRC's Preparatory Study.

In the delegated act on textile apparel, there could be many ways of disclosing a score/s to define the performance of a product. Which of the following options do you consider most appropriate for textile apparel?

- ☐ Disaggregated values specifying the information on robustness, recyclability, recycled content, and environmental impacts.
- ☐ Disaggregated values specifying the information on robustness, recyclability, recycled content, environmental impacts, and extrinsic durability.
- ☐ Only an "expanded ESPR score", which would combine information on robustness, recyclability, recycled content, environmental impacts, and extrinsic durability in one aggregated value.
- ☒ The referred "expanded ESPR score" alongside with the specific information on robustness, recyclability, recycled content, environmental impacts, and extrinsic durability.
- ☐ Only an "ESPR score", which would combine information on robustness, recyclability, recycled content, and environmental impacts into one aggregated value.
- ☐ The referred "ESPR score" alongside with the specific information on robustness, recyclability, recycled content, and environmental impacts.
- ☐ Only a "circularity score", which would combine information on robustness, recyclability, and recycled content into one aggregated value.
- ☐ The referred "circularity score" alongside with the specific information on robustness, recyclability and recycled content.
- ☐ Other
- ☐ I have no opinion

* 13.3.1 Why?

Text of 1 to 5000 characters will be accepted

Single score would help consumers, but other information should also be available.

* 13.3.2 Weighting of product aspects into the ESPR or Circularity score

You propose the use of an aggregated value, i.e. expanded ESPR score, ESPR score or circularity score. How would you weight all product aspects considered into the aggregated value?

Text of 1 to 5000 characters will be accepted

no opinion

* 13.5 Date of application of DO1 on robustness

What should be the date of entry into application in a possible future delegated act of provisions associated to DO1 on robustness? Why?

Text of 1 to 5000 characters will be accepted

2029

* 13.6 Date of application of DO2 on recyclability

What should be the date of entry into application in a possible future delegated act of provisions associated to DO2 on recyclability? Why?

Text of 1 to 5000 characters will be accepted

2029

* 13.7 Date of application of DO3 on recycled content

What should be the date of entry into application in a possible future delegated act of provision associated to DO3 on recycled content? Why?

Text of 1 to 5000 characters will be accepted

2029

* 13.8 Date of application of DO4.1 on environmental footprint

What should be the date of entry into application in a possible future delegated act for provisions associated to DO4.1 on environmental footprint? Why?

Text of 1 to 5000 characters will be accepted

2029

* 13.9 Date of application of DO4.2 on environmental footprint

What should be the date of entry into application in a possible future delegated act for provisions associated to DO4.2 on carbon footprint? Why?

Text of 1 to 5000 characters will be accepted

2029

* 13.10 EPR fee modulation

Should the EPR fee modulation be based on information requirements for:

- ☐ Recyclability
- ☐ Robustness
- ☐ Recycled content
- ☒ Other
- ☐ I have no opinion

* 13.10.1 Please specify the information requirement you refer to

Text of 1 to 5000 characters will be accepted

Should be jointly based on recyclability, robustness and recycled content.

14. Parts of the working document not addressed above

* 14.1 Contributions related to other parts of the working document

Do you want to comment other elements / parts of the working document?

- ☐ Yes
- ☒ No, I want to skip this section of the questionnaire

Finalization of **Part 2 of 2** the questionnaire

Your opinion matters to us.

Thank you very much for taking the time to contribute to

Part 2 of 2 of this consultation.

Contact

[Contact Form](#)

