

Survey for the Impact Assessment Support Study on Ecodesign Requirements for Apparel Textiles

Fields marked with * are mandatory.

Introduction

Context of the consultation

With the **Ecodesign for Sustainable Products and Energy Labelling Working Plan 2025-2030**, the European Commission announced the preparation of information and performance requirements for apparel textiles under the **Ecodesign for Sustainable Products Regulation (ESPR)**. The objective of this initiative is to improve the life-cycle environmental performance of apparel textile products. This consultation is part of the Impact Assessment study that will inform decisions on whether and which Ecodesign requirements should be set for apparel textiles, with a particular focus on nonenergy-related aspects such as durability, reusability, repairability, fibre-to-fibre recyclability and mandatory recycled fibre content, to minimise and track the presence of substances of concern and to reduce the adverse impacts on climate and the environment. Additionally, information requirements should be investigated, including the implementation of a **Digital Product Passport (DPP) for apparel textiles**.

Purpose of the consultation

This consultation relates to apparel textiles. The purpose is to validate findings from the JRC report "[Study on DPP content for textile apparel products under ESPR](#)" and to collect evidence to support the Impact Assessment study which can be used by the Commission to develop and adopt a Delegated Act (DA) on eco-design requirements for apparel textiles, as per Article 4 of the Ecodesign for Sustainable Products Regulation (EU 2024/1781).

Target audience

This consultation is intended for all stakeholders affected directly or indirectly by the ESPR and the Digital Product Passport.

Personal data and privacy statement

The European Union is committed to protecting your personal data and to respecting your privacy. When carrying out public consultations we adhere to the policy on 'protection of individuals with regard to the processing of personal data by the Community institutions', based on Regulation (EU) 2018/1725 on processing of personal data by the EU institutions.

How to respond to the questionnaire

To contribute to this consultation we encourage you to fill in this online questionnaire by scrolling down until you find the submission button. If you are unable to use the online questionnaire, please contact us at corina.haita-falah@trinomics.eu and eduard.wagner@izm.fraunhofer.de. You can pause any time and continue later. You can download your contribution once you have submitted your answers.

We thank you for your contribution to this survey.

Stakeholder identification

*** Please choose the type of organisation you are representing from the list below.**

If you are representing an industry association, please answer all questions for the majority of your members. If you cannot answer a question or if it is not applicable, you may skip the question.

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

*** What is the name of your organisation?**

Finnwatch

*** Please select the country in which your organisation is mostly active.**

Finland

*** What is your role in the value chain?**

More answers are possible.

- ☐ Manufacturer
- ☐ Importer
- ☐ Distributor
- ☐ Repairer
- ☐ Reuse Operator (second-hand importer/exporter)
- ☐ Brand
- ☐ Recycler/Sorter
- ☐ Retailer
- ☒ Other (please specify below)

Your role in the value chain (if answered "other")

NGO

*** What is the sector you are mainly working in?**

- ☐ Apparel/textile
- ☒ Other (please specify below)

Your sector (if answered "other")

NGO

Validation of DPP use cases

Please express your agreement or disagreement in relation to the following DPP use cases.

Use case name: Inform sustainable purchasing decisions

Note: Please find detailed use-case description in the JRC report "[Study on DPP content for textile apparel products under ESPR](#)", Annex 1.

Description	Primary actors	Secondary actors	Do you agree with this use case?	If strongly disagree or disagree, please specify why.
At point of sale (new or second-hand), DPP gives data on durability, recycled content, recyclability and environmental impact.	Consumers / retailers	Retailer or second-hand seller	☐ Strongly disagree ☐ Disagree ☐ Neutral ☐ Agree ☒ Strongly agree ☐ Don't know/not applicable	

Use case name: Maintaining apparel appropriately

Note: Please find detailed use-case description in the JRC report "[Study on DPP content for textile apparel products under ESPR](#)", Annex 1.

Description	Primary actors	Secondary actors	Do you agree with this use case?	If strongly disagree or disagree, please specify why.
DPP offers permanent access to detailed care instructions beyond potentially lost/illegible physical labels.	Consumers	Independent operator (Repairer, Tailor), Laundry and dry-cleaning operations	☐ Strongly disagree ☐ Disagree ☐ Neutral ☒ Agree ☐ Strongly agree ☐ Don't know/not applicable	

Use case name: **Self-repair of worn apparel**

Note: Please find detailed use-case description in the JRC report "[Study on DPP content for textile apparel products under ESPR](#)", Annex 1.

Description	Primary actors	Secondary actors	Do you agree with this use case?	If strongly disagree or disagree, please specify why.
DPP could provide repair instructions and component specifications (e.g. buttons, zippers) for DIY repairs.	Consumers	Not applicable	☐ Strongly disagree ☐ Disagree ☐ Neutral ☒ Agree ☐ Strongly agree ☐ Don't know/not applicable	

Use case name: Finding repair services

Note: Please find detailed use-case description in the JRC report "[Study on DPP content for textile apparel products under ESPR](#)", Annex 1.

Description	Primary actors	Secondary actors	Do you agree with this use case?	If strongly disagree or disagree, please specify why.
DPP could list brand-provided repair services (where available), with details and contact information.	Consumers/brands	Independent operator (Repairer, Tailor)	☐ Strongly disagree ☐ Disagree ☐ Neutral ☒ Agree ☐ Strongly agree ☐ Don't know/not applicable	

Use case name: B2B data exchange for second-hand market resale

Note: Please find detailed use-case description in the JRC report "[Study on DPP content for textile apparel products under ESPR](#)", Annex 1.

Description	Primary actors	Secondary actors	Do you agree with this use case?	If strongly disagree or disagree, please specify why.
Manufacturers share detailed, verifiable data via DPP to support resellers with authenticity and product information.	Second-hand resellers	Apparel Manufacturer	☐ Strongly disagree ☐ Disagree ☐ Neutral ☒ Agree ☐ Strongly agree ☐ Don't know/not applicable	

Use case name: B2B data exchange to facilitate repair actions

Note: Please find detailed use-case description in the JRC report "[Study on DPP content for textile apparel products under ESPR](#)", Annex 1.

Description	Primary actors	Secondary actors	Do you agree with this use case?	If strongly disagree or disagree, please specify why.
DPP enables exchange of component-specific data so repairers can source identical parts and preserve garment aesthetics.	Repair service providers	Apparel Manufacturer	☐ Strongly disagree ☐ Disagree ☐ Neutral ☒ Agree ☐ Strongly agree ☐ Don't know/not applicable	

Use case name: **Data exchange to facilitate sorting**

Note: Please find detailed use-case description in the JRC report "[Study on DPP content for textile apparel products under ESPR](#)", Annex 1.

Description	Primary actors	Secondary actors	Do you agree with this use case?	If strongly disagree or disagree, please specify why.
End-of-life operators use DPP data on composition, hazardous substances, recyclability to sort for reuse and recycling.	End-of-Life textile sorter	Recycling Facility	☐ Strongly disagree ☐ Disagree ☐ Neutral ☒ Agree ☐ Strongly agree ☐ Don't know/not applicable	

Do you see any additional DPP use cases that should be considered? Please provide details in the textbox below.

In addition to the identified use cases, the information collected for DPPs should be publicly available via database so that stakeholders such as researchers, media, authorities and NGOs can use the data in their work on corporate sustainability and value chains.

DPP content data validation

For more information related to the following questions, please find detailed description of data points, granularity and access level in the JRC report [Study on DPP content for textile apparel products under ESPR](#).

Do you agree with the following recommended data points and their configurations regarding granularity and access level for **Product Identification & Classification** data category specified below?

Data points	Granularity level	Access level	Do you agree?	If strongly disagree or disagree, please specify why.
Unique Product (item) ID: SGTIN Serialised Global Trade Item Number (GS1) or equivalent, compliant with prEN18219	Item	Public	☐ Strongly disagree ☐ Disagree ☐ Neutral ☒ Agree ☐ Strongly agree ☐ Don't know/not applicable	
Batch ID: GTIN Global Trade Item Number (GS1) + Lot number or equivalent compliant with prEN18219	Batch	Public	☐ Strongly disagree ☐ Disagree ☐ Neutral ☐ Agree ☒ Strongly agree ☐ Don't know/not applicable	
Model ID: GTIN-13 (GS1) or equivalent, compliant with prEN18219	Model	Public	☐ Strongly disagree ☐ Disagree ☐ Neutral ☐ Agree ☒ Strongly agree ☐ Don't know/not applicable	

ESPR category (knitted, woven, high denim product) and PEFCR category for Apparel and Footwear	Model	Public	☐ Strongly disagree ☐ Disagree ☐ Neutral ☐ Agree ☒ Strongly agree ☐ Don't know/not applicable	
Commodity Code (HS code, TARIC)	Model	Public	☐ Strongly disagree ☐ Disagree ☐ Neutral ☐ Agree ☒ Strongly agree ☐ Don't know/not applicable	
Manufacturing date	Batch	Public	☐ Strongly disagree ☐ Disagree ☐ Neutral ☐ Agree ☒ Strongly agree ☐ Don't know/not applicable	

If possible, please specify which other standards you use for the identification of products (other than SGTIN).

If possible, please specify which other standards you use for the identification of batches (other than GTIN+Lot number).

If possible, please specify which other standards you use for the identification of models (other than GTIN-13).

Do you agree with the following recommended data points and their configurations regarding granularity and access level for **Producer Identification** data category specified below?

Data points	Granularity level	Access level	Do you agree?	If strongly disagree or disagree, please specify why.
Unique operator identifier (manufacturer, importer, other): Party Global Location Number (Party GLN), or equivalent, compliant with prEN18219, and Economic Operators Registration and Identification (EORI)	Batch	Public	☐ Strongly disagree ☐ Disagree ☐ Neutral ☐ Agree ☒ Strongly agree ☐ Don't know/not applicable	
Operator name, address (manufacturer, importer, other)	Batch	Public	☐ Strongly disagree ☐ Disagree ☐ Neutral ☐ Agree ☒ Strongly agree ☐ Don't know/not applicable	
Operator contact (manufacturer, importer and other)	Batch	Authority only	☐ Strongly disagree ☐ Disagree ☐ Neutral ☐ Agree ☒ Strongly agree ☐ Don't know/not applicable	

Unique facility identifier: Global Location Number (GLN), or equivalent, compliant with prEN18219	Batch	Public	☐ Strongly disagree ☐ Disagree ☐ Neutral ☐ Agree ☒ Strongly agree ☐ Don't know/not applicable	
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If possible, please specify below which standards you use/can be used for the unique operator identifier.

If possible, please specify below which standards you use/can be used for the unique facility identifier.

Do you agree with the following recommended data points and their configurations regarding granularity and access level for **Product Information - Material** data category specified below?

Data points	Granularity level	Access level	Do you agree?	If strongly disagree or disagree, please specify why.
Fibre composition	Model	Public	☐ Strongly disagree ☐ Disagree ☐ Neutral ☐ Agree ☒ Strongly agree ☐ Don't know/not applicable	
Components specification	Model	Public	☐ Strongly disagree ☐ Disagree ☐ Neutral ☐ Agree ☒ Strongly agree ☐ Don't know/not applicable	

Do you agree with the following recommended data points and their configurations regarding granularity and access level for **Product Information - Mechanical properties** data category specified below?

Data points	Granularity level	Access level	Do you agree?	If strongly disagree or disagree, please specify why.
Robustness score	Model	Public	☐ Strongly disagree ☐ Disagree ☐ Neutral ☐ Agree ☒ Strongly agree ☐ Don't know/not applicable	
Visual inspection (Test results according to ISO 15487)	Batch (self-declaration)/ Model (third-party certified)	Public	☐ Strongly disagree ☐ Disagree ☐ Neutral ☐ Agree ☒ Strongly agree ☐ Don't know/not applicable	
Spirality (in %, Test results according to ISO 16322-3)	Batch (self-declaration)/ Model (third-party certified)	Public	☐ Strongly disagree ☐ Disagree ☐ Neutral ☐ Agree ☒ Strongly agree ☐ Don't know/not applicable	

Dimensional change (In %, Test results according to ISO 3759)	Batch (self-declaration)/ Model (third-party certified)	Public	☐ Strongly disagree ☐ Disagree ☐ Neutral ☐ Agree ☒ Strongly agree ☐ Don't know/not applicable	
Conformity certification	Batch (self-declaration)/ Model (third-party certified)	Authority only	☐ Strongly disagree ☐ Disagree ☐ Neutral ☐ Agree ☒ Strongly agree ☐ Don't know/not applicable	

Do you agree with the following recommended data points and their configurations regarding granularity and access level for
Product Information - Chemical Properties data category specified below?

Data points	Granularity level	Access level	Do you agree?	If strongly disagree or disagree, please specify why.
Name of Substances of Concern (SoC)	Batch	Public	☐ Strongly disagree ☐ Disagree ☐ Neutral ☐ Agree ☒ Strongly agree ☐ Don't know/not applicable	
Location of the SoC	Batch	Legitimate interest	☐ Strongly disagree ☐ Disagree ☐ Neutral ☐ Agree ☒ Strongly agree ☐ Don't know/not applicable	
Concentration of SoC	Batch	Public	☐ Strongly disagree ☐ Disagree ☐ Neutral ☐ Agree ☒ Strongly agree ☐ Don't know/not applicable	

Relevant instructions for the safe use	Batch	Public	☐ Strongly disagree ☐ Disagree ☐ Neutral ☐ Agree ☒ Strongly agree ☐ Don't know/not applicable	
Information relevant for disassembly, reuse, recycling and management at EoL	Batch	Legitimate interest	☐ Strongly disagree ☐ Disagree ☐ Neutral ☐ Agree ☒ Strongly agree ☐ Don't know/not applicable	

In your opinion, which stakeholders have a "legitimate interest" to access **location of the SoC information?**

All this information should be made publicly available as they are relevant for consumers and stakeholders that protect the interests of consumers in their work (NGOs, researcher, media...).

In your opinion, which stakeholders have a "legitimate interest" to access **information relevant for disassembly, reuse, recycling and management at EoL?**

All this information should be made publicly available as they are relevant for consumers and stakeholders that protect the interests of consumers in their work (NGOs, researcher, media...).

Do you agree with the following recommended data points and their configurations regarding granularity and access level for **Product Information - Recyclability** data category specified below?

Data points	Granularity level	Access level	Do you agree?	If strongly disagree or disagree, please specify why.
Recyclability score	Model	Public	☐ Strongly disagree ☐ Disagree ☐ Neutral ☐ Agree ☒ Strongly agree ☐ Don't know/not applicable	
Conformity certification	Model	Authority only	☐ Strongly disagree ☐ Disagree ☐ Neutral ☐ Agree ☒ Strongly agree ☐ Don't know/not applicable	

Do you agree with the following recommended data points and their configurations regarding granularity and access level for **Product Information - Recycled Content** data category specified below?

Data points	Granularity level	Access level	Do you agree?	If strongly disagree or disagree, please specify why.
Recycled content (%)	Model	Public	☐ Strongly disagree ☐ Disagree ☐ Neutral ☐ Agree ☒ Strongly agree ☐ Don't know/not applicable	
Origin of the recycled content (post consumer /Industrial)	Batch	Public	☐ Strongly disagree ☐ Disagree ☐ Neutral ☐ Agree ☒ Strongly agree ☐ Don't know/not applicable	
Weight (excluding trims, in kg)	Batch	Legitimate interest	☐ Strongly disagree ☐ Disagree ☐ Neutral ☐ Agree ☒ Strongly agree ☐ Don't know/not applicable	

Amount of recycled material (in kg)	Batch	Legitimate interest	☐ Strongly disagree ☐ Disagree ☐ Neutral ☐ Agree ☒ Strongly agree ☐ Don't know/not applicable	
Conformity certification	Batch	Authority only	☐ Strongly disagree ☐ Disagree ☐ Neutral ☐ Agree ☒ Strongly agree ☐ Don't know/not applicable	

In your opinion, which stakeholders have a "legitimate interest" to access **weight (excluding trims) information?**

In your opinion, which stakeholders have a "legitimate interest" to access **amount of recycled material information?**

Do you agree with the following recommended data points and their configurations regarding granularity and access level for **Product Information - Other EU law** data category specified below?

Data points	Granularity level	Access level	Do you agree?	If strongly disagree or disagree, please specify why.
Organic content (%)	Model	Public	☐ Strongly disagree ☐ Disagree ☐ Neutral ☐ Agree ☒ Strongly agree ☐ Don't know/not applicable	
Amount of organic material (In kg)	Batch	Legitimate interest	☐ Strongly disagree ☐ Disagree ☐ Neutral ☐ Agree ☒ Strongly agree ☐ Don't know/not applicable	
Conformity certification	Batch	Authority only	☐ Strongly disagree ☐ Disagree ☐ Neutral ☐ Agree ☒ Strongly agree ☐ Don't know/not applicable	
EU Ecolabel	Model	Public	☐ Strongly disagree ☐ Disagree ☐ Neutral ☐ Agree ☒ Strongly agree ☐ Don't know/not applicable	

In your opinion, which stakeholders have a "legitimate interest" to access **amount of organic material**?

Do you agree with the following recommended data points and their configurations regarding granularity and access level for **Product Information - Product Footprint** data category specified below?

Data points	Granularity level	Access level	Do you agree?	If strongly disagree or disagree, please specify why.
Product carbon/environmental footprint – Class of performance	Model	Public	☐ Strongly disagree ☐ Disagree ☐ Neutral ☐ Agree ☒ Strongly agree ☐ Don't know/not applicable	
Product carbon/environmental footprint – Absolute value	Model	Legitimate interest	☐ Strongly disagree ☐ Disagree ☐ Neutral ☐ Agree ☒ Strongly agree ☐ Don't know/not applicable	
Product carbon/environmental footprint calculation parameters	Model	Legitimate interest	☐ Strongly disagree ☐ Disagree ☐ Neutral ☐ Agree ☒ Strongly agree ☐ Don't know/not applicable	

Weight of average final product (including trims, in kg)	Model	Public	☐ Strongly disagree ☐ Disagree ☐ Neutral ☐ Agree ☒ Strongly agree ☐ Don't know/not applicable	
Conformity declaration	Model	Authority only	☐ Strongly disagree ☐ Disagree ☐ Neutral ☐ Agree ☒ Strongly agree ☐ Don't know/not applicable	

In your opinion, which stakeholders have a "legitimate interest" to access **product carbon/environmental footprint – absolute value?**

This information should be publicly available. If not, researchers, media, authorities, public procurers and NGOs studying the climate impacts of garment industry should be included as ones having a "legitimate interest".

In your opinion, which stakeholders have a "legitimate interest" to access **product carbon/environmental footprint calculation parameters?**

This information should be publicly available. If not, researchers, media, authorities, public procurers and NGOs studying the climate impacts of garment industry should be included as ones having a "legitimate interest".

Do you agree with the following recommended data points and their configurations regarding granularity and access level for **Product Information - Manuals and Instructions** data category specified below?

Data points	Granularity level	Access level	Do you agree?	If strongly disagree or disagree, please specify why.
Care instructions	Model	Public	☐ Strongly disagree ☐ Disagree ☐ Neutral ☐ Agree ☒ Strongly agree ☐ Don't know/not applicable	
Repair instructions	Model	Public	☐ Strongly disagree ☐ Disagree ☐ Neutral ☐ Agree ☒ Strongly agree ☐ Don't know/not applicable	
Contact of repair services offered by brand	Model	Public	☐ Strongly disagree ☐ Disagree ☐ Neutral ☐ Agree ☒ Strongly agree ☐ Don't know/not applicable	
Warranty duration	Model	Public	☐ Strongly disagree ☐ Disagree ☐ Neutral ☐ Agree ☒ Strongly agree ☐ Don't know/not applicable	

Are there any DPP data points that you consider useful, but that should remain voluntary rather than mandatory? If yes, please specify the data point(s). If relevant, briefly describe the relevant use case and why voluntary provision would be more appropriate.

All datapoints should be mandatory.

Data carrier and additional DPP features

*** Which data carrier do you see most suitable?**

- ☒ QR code
- ☒ RFID
- ☐ Other (please specify below)
- ☐ I don't know

*** What do you think should be the appropriate overall level of granularity of the DPP identifier?**

- ☐ Model level
- ☒ Batch level
- ☐ Item level

*** Do you agree that flexible granularity should be allowed for selected data points, meaning that stakeholders may choose the most appropriate granularity level depending on their context?**

- ☐ Strongly disagree
- ☐ Disagree
- ☐ Neutral
- ☐ Agree
- ☐ Strongly agree
- ☒ Don't know/not applicable

Which offline content or similar features via an app do you see useful?

*** Do you see links to EU ICT tools relevant, other than CERTEX (notably ICSMS, Safety Gate and IPEP)?**

- ☐ Additional burden
- ☐ Neutral
- ☐ Additional benefit
- ☒ I cannot judge

Do you have any further comments related to EU ICT tools and their relevance for the DPP for apparel textile?

In your opinion, is there any other content that should be included in the DPP on a voluntarily basis? Please provide details below.

DPP related costs and benefits

Is your organisation currently planning DPP-related investments e.g. for IT equipment / infrastructure, personal?

- ☐ Yes
- ☐ No
- ☐ I am not aware
- ☒ Not applicable

Is your organisation planning to use an external DPP service provider (third-party solution)?

- ☐ Yes
- ☐ No

- ☐ Not decided
- ☒ I don't know/Not applicable

What type(s) of traceability system do you use to collect, manage or share product or supply chain related information?

- ☐ none
- ☐ paper-based records
- ☐ spreadsheets
- ☐ enterprise resource planning (ERP) systems
- ☐ certification-based chain of custody systems
- ☐ supplier portals or buyer specific platforms
- ☐ specialised traceability software
- ☐ traceability systems relying on blockchain / distributed Ledger
- ☐ other (please specify below)
- ☒ not applicable

Regarding your technical infrastructure, do you expect significant additional costs to adapt or upgrade your existing IT systems to meet DPP requirements (e.g. new server, system integration, IT equipment)?

- ☐ Yes
- ☐ No
- ☒ I don't know/Not applicable

Regarding your personnel resources, would you expect significant additional costs to host the DPP (e.g. IT administrator full time/part time)?

- ☐ Yes
- ☐ No
- ☒ I don't know/Not applicable

What benefits in your operations do you anticipate from the existence of a DPP?

- ☒ Access to data that I otherwise would have no access to
- ☒ Faster and easier access to the data I need
- ☐ Reduction in cost of my operations
- ☐ Improvement in the quality or features of my product / service
- ☐ Reduction in the energy / water / resource use intensity of my operations
- ☐ Reduction in the climate / environmental footprint of my operations

- ☐ Other, please specify.
- ☐ I don't know/Not applicable

Would you like to provide any further comments on DPP related costs and benefits?

Closing

Please add any final comments that you may have.

The DPP should include further datapoint requirements to ensure the transparency on the value chain. For example, the manufacturers/importers should be obliged to disclose information on the materials used and this should include requirements such as the origin and any certifications (such as fair trade). Such information can help consumers in choosing products that are sustainable.

Contact

[Contact Form](#)