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Webinar

Product Compliance in Fashion & Textiles: Navigating New Rules on Labelling, Ecodesign & Environmental Claims

27 August, 2025

→ | **complianceandrisks.com**

Q&A Session

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Meet the Team

Emilia Assenza,
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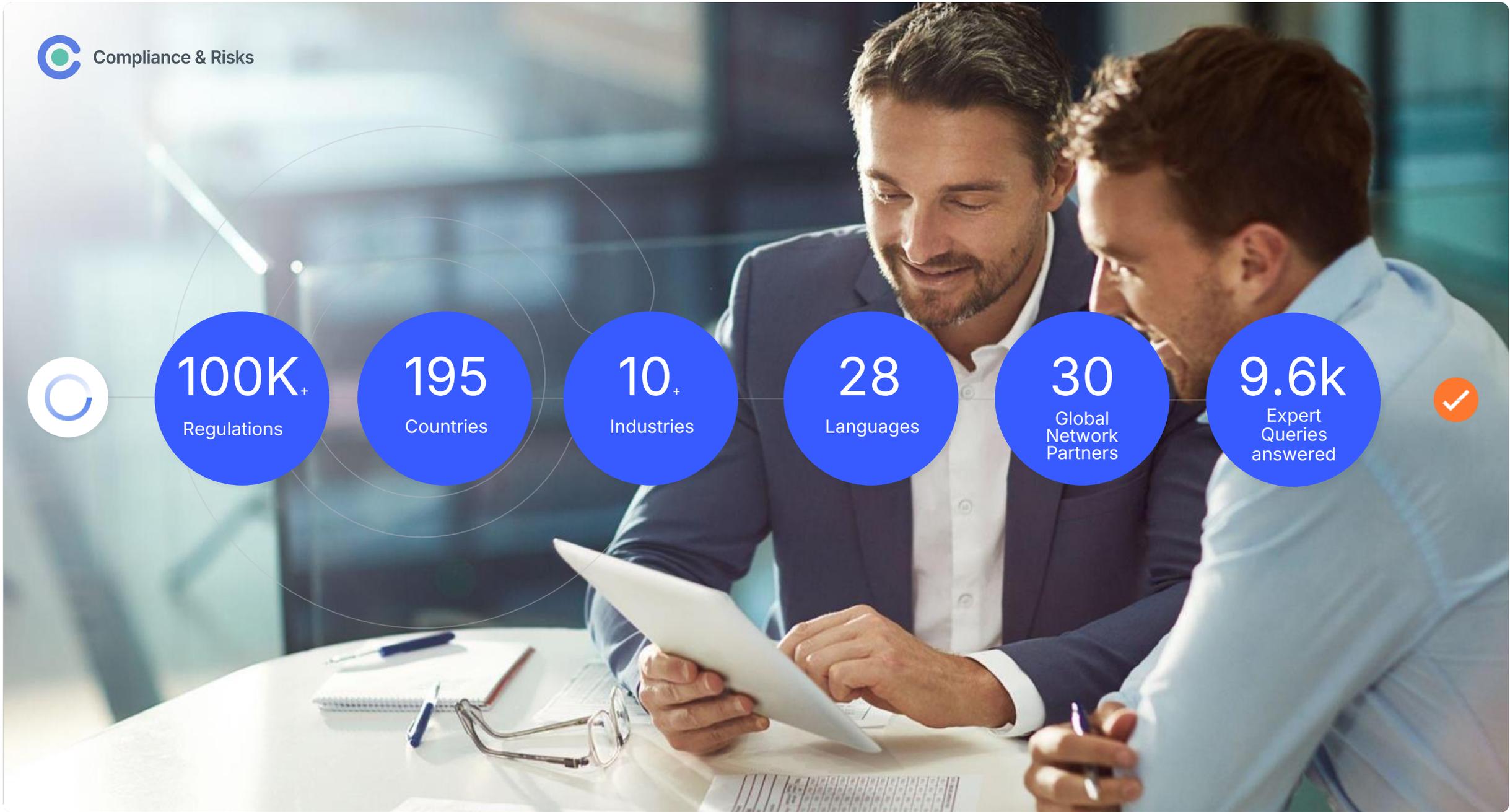
WHAT WE DO

Unlocking Market Access

Keep on top of regulatory changes and their impact worldwide. Early warning alerts, impact probability, productivity workflow tools and so much more.

EARLY PRODUCT LAUNCH

PRODUCT RECALL

REGULATION UPDATE AVAILABLE

MARKET RISK ALERT

REVENUE TARGETS EXCEEDED

POLICY UPDATES RELEASED

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Āgenda

01. Product-focused regulations
- Labeling
- Environmental Claims
- Ecodesign
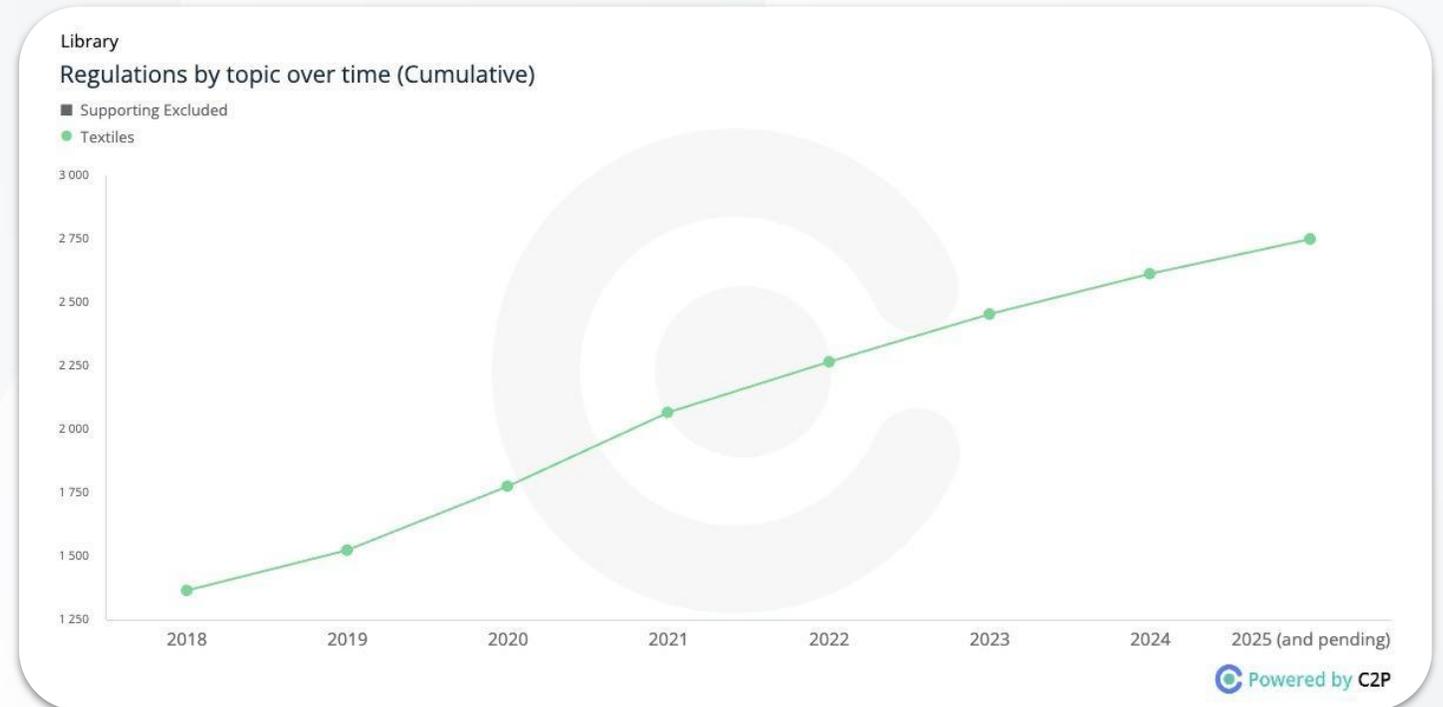
02. Horizontal rules applicable to textile products
- GPSR
- Other must-know developments

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Number of regulations is growing

Proving difficult to catch up

- **92% increase** in Textiles regulations since 2018
- **137 new regulations** in the last six months

Library
Regulations by topic over time (Cumulative)

■ Supporting Excluded
● Textiles

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Recent Updates on Labeling

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Revision of Textile Labeling Regulation (EU) 1007/2011

Timeline

Aug - Sept 2023	Call for evidence
Dec 2023 - Apr 2024	Public consultation
October 2024	Validation workshop
September 2025	Expected publication of proposal (originally planned for Q2 - delayed)

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Textile Labeling Regulation (EU) 1007/2011

Points under discussion

- Revision of fiber names - Annex 1
- Contents of label (fiber composition only for now)
- Physical vs Digital Labels (strong request from companies - resistance from consumer protection agencies)
- Necessary translations

Aim: harmonisation, less burden for companies and better informed consumers

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US Care Labeling Rule

February 2025: AAFA petition for digital labeling - with deadline for comments until 18 April 2025

- Allow manufacturers to comply with Rule through digital labels
- Not proposing any change to the substance of labeling

Next steps:
- Delay in the review by FTC
- Survey by 8 August 2025

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France's Eco Score

- **Scope:** Display of environmental cost by all manufacturers, importers and distributors offering textiles products for sale in France

- Voluntary, to become mandatory in 2026

- Calculation methods: 16 + 2 environmental indicators

- Ecobalyse platform launched by government

COÛT ENVIRONNEMENTAL
360
points d'impact

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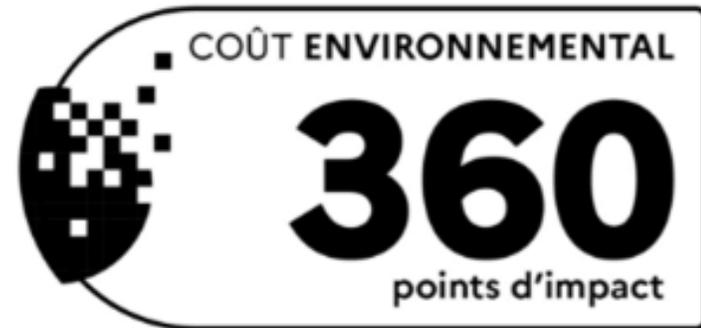
Turkey: Parts of Animal Origin in Consumer Products Must Be Disclosed

- **9 June 2025** new obligations for businesses placing consumer products with parts of animal origin on the market, with focus on textiles and footwear

- Companies must provide clear and understandable information regarding product parts of animal origin
    - identify animal from which parts derive
    - include on a label, the packaging or accompanying document
    - in case of e-commerce, in the area where the product features are specified
    - in Turkish

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Québec: New Trademark Language Rules

1 June 2025

- Generic (e.g. 'shirt', 'pants') or descriptive (e.g. 'cotton', 'striped') elements of a trademark must appear in French on the product
- French translation of any generic or descriptive elements must be at least as prominent as the non-French terms
- Product name and company name are excluded from the translation requirement

Sell-through period applies until 1 June 2027 for products manufactured before 1 June 2025

NATIONAL ASSEMBLY OF QUÉBEC

SECOND SESSION   FORTY-SECOND LEGISLATURE

Bill 96
(2022, chapter 14)

**An Act respecting French, the official and common language of Québec**

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China: Implementation Plan for Digital Transformation of the Textile Industry

17 June 2025

- Traceability: aiming to achieve full traceability from raw materials to finished products, building complete traceability chains for each batch, including information on materials sourcing, production parameters, test results etc.
- RFID tags can be used for these purposes

25 June 2025

- 2025 China Textile Industry Digital Product Passport White Paper

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Environmental Claims

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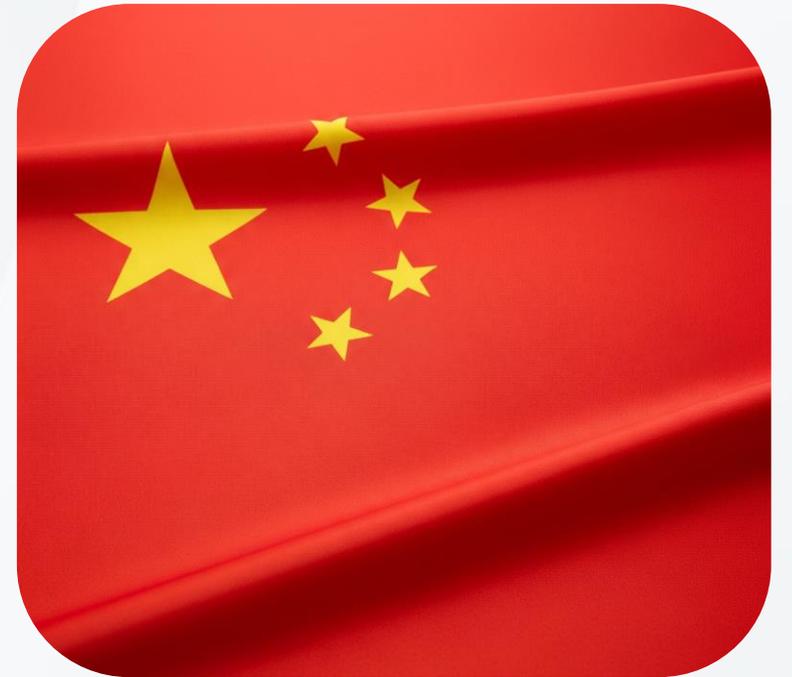
Step 1: EU Greenwashing Directive 2024/825

Broad definition of:

- Environmental claim
  Text, pictorial, graphic or symbolic representation... which states or implies that a product... has a positive/zero environmental impact or is less damaging to the environment than other products.

- Sustainability label
  Any voluntary mark that aims to promote a product by reference to its environmental or social characteristics

Deadline for Transposition: By 27 March 2026

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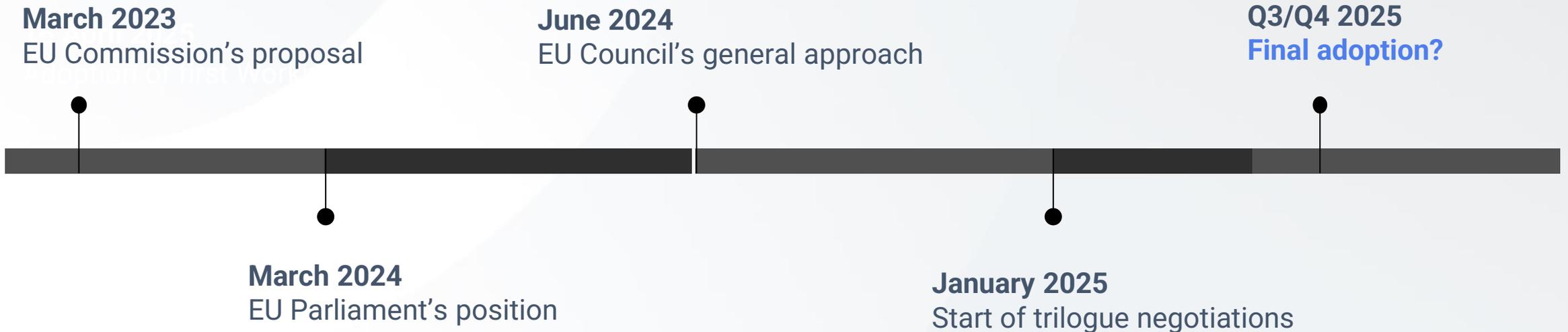# Step 1: EU Greenwashing Directive 2024/825

Prohibits:

- Generic environmental claims without demonstrating excellent environmental performance
- Display of a sustainability label not based on a certification scheme
- Environmental claims about the entire product when it concerns only a certain aspect
- Claiming, based on the offsetting of GHG emissions, that a product has a neutral, reduced or positive impact on the environment

Examples

- 'Environmentally-friendly'
- 'Eco-friendly' / 'Green'
- 'Climate friendly'/'Climate-neutral'

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Step 2: EU Green Claims Directive (draft)

March 2023
EU Commission's proposal

June 2024
EU Council's general approach

Q3/Q4 2025
Final adoption?

March 2024
EU Parliament's position

January 2025
Start of trilogue negotiations

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Step 2: EU Green Claims Directive (draft)

If companies are going to make a claim, it must be:

- **Substantiated:** Based on widely recognised scientific evidence
- **Appropriately communicated**
- **Ex-ante verification:** By accredited 3rd party conformity assessment body

Points under discussion:
- Simplified procedure proposed
- Exemptions for microenterprises
- Maximum verification time
- Penalties
- Transition period

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Recent Updates

- **Canada**
  - Amendment to the Competition Act - effective from 20 June 2024
  - Guidelines finalised on 5 June 2025

- **USA**
  - Green Guides - consultation closed. Revised text expected

- **UK**
  - New enforcement powers of CMA from 6 April 2025

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Recent Updates

- Australia
  - 2025-2026 Compliance and Enforcement Policy and Priorities

- Mexico
  - February 2025 - Proposed amendment to the Consumer Protection Law

- Worldwide
  - ICPEN open letter to the fashion sector from Consumer Protection Authorities dated 30 April 2025

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Key Trends

- Rise in greenwashing disputes
    - Misleading carbon neutrality claims
    - Percentage of green fibres used in garment
    - Product recyclability

- Rise in "greenhushing"

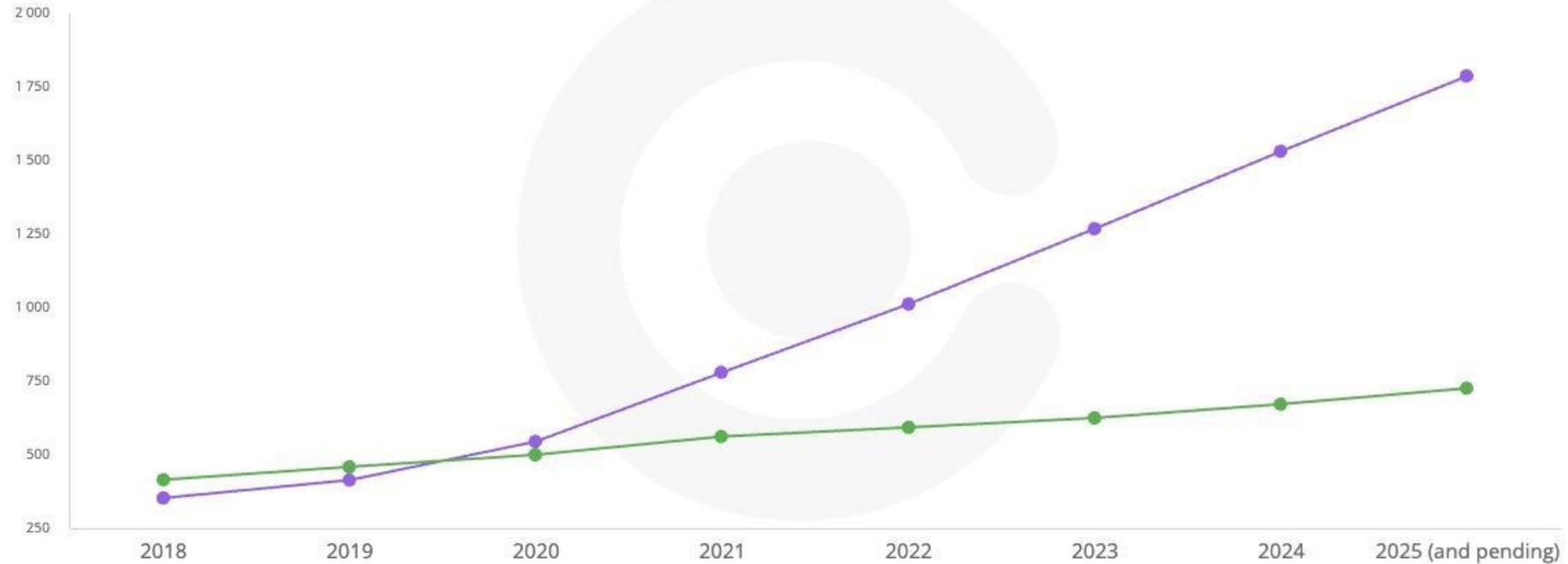**Greenwashing Disputes**

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Circular Economy/Ecodesign

Library

Regulations by topic over time (Cumulative)

■ Supporting Excluded
● Circular Economy ● Ecodesign

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EU ESPR
Framework for Setting Ecodesign Requirements for Sustainable Products

- Repeals existing Ecodesign Directive - Effective from July 2024

- Applies to ALL products (with limited exceptions) on EU market *"in order to make sustainable products the norm and to reduce their overall carbon and environmental footprint over their lifecycle"*

- First Working Plan published on 16 April 2025. Priority Products include textiles

- Part of the EU Strategy for Sustainable and Circular Textiles - March 2022

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Performance Requirements

"High potential to improve lifetime extension, material efficiency and to reduce impacts on water, waste generation, climate change and energy consumption."

- **Horizontal Requirements:**
  - Durability
  - Recyclability
  - Post-consumer recycled content

- **Potential textile-specific requirements:**
  - Limits to water and energy consumption and chemical/ fertilizer use during production
  - Resistance to microplastic shedding
  - Modular design
  - Minimum percentage of materials with sustainability certificate
  - Quality: resistance to shrinkage and weathering

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Information Requirements

"Information requirements under the ESPR will work in synergy with the Textile Labelling Regulation, currently under review."

- Digital Product Passport
  - Format: QR Code or Barcode on product
  - Content includes:
    - Unique Product Identifier
    - GTIN
    - Tariff Codes (HS)
    - Compliance documents
    - Substances of concern
    - User Manuals
    - Traceability: Manufacturer, operators information etc.

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EU GPSR

GPSR: New EU Safety Standard

Selling fashion items in the EU? You may have obligations under the GPSR since 13 December 2024

Scope
Applies to all consumer products - scope expansion to include all textiles: clothing, fashion accessories, footwear, innovative fashion items, home furnishings, *NEW* or *USED*

Key Obligations
- Basic safety requirement
- Reporting of accidents and safety issues
- Traceability

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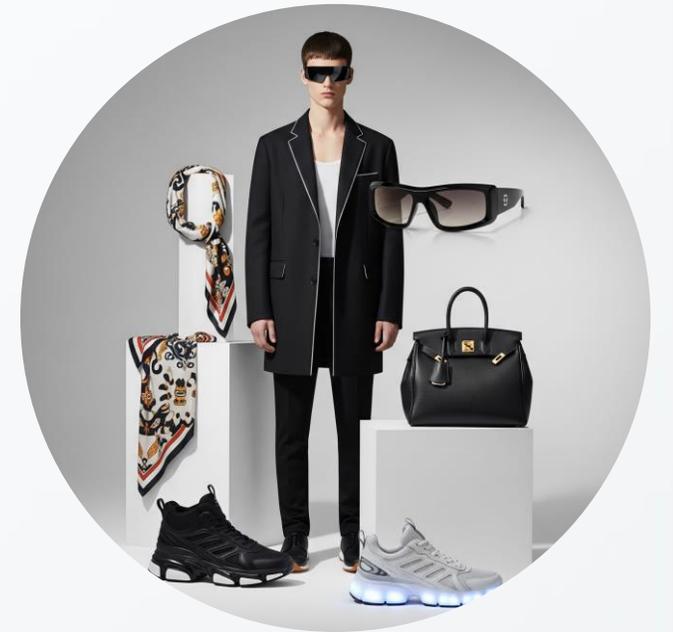
GPSR: Safety Obligation, Accident Reporting

Safety
- EU Commission mandates product safety by design
- Manufacturers must perform an internal risk analysis to determine where risks lie for each product
- Non-exhaustive list of aspects for assessing safety
- Technical documentation constitutes proof that the risk analysis has been performed

Reporting accidents
- Inform consumers of dangerous product on market *directly, if possible*
- Inform surveillance authorities through Safety Business Gateway

Corrective actions
- Where a recall is undertaken, it must be well-communicated, with clear information provided to consumers

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GPSR: Products Must be Traceable

- Product Identification

- Manufacturer/importer information - incl. postal and electronic address

- Single Contact Point (if different from manufacturer)

- Appoint Responsible Person (if manufacturer is not in EU)

- E-commerce - online product listings must include the same information as is normally included in the case of a physical offer for sale

Reporting + Traceability = more data available to regulators, increased scrutiny, enforcement and *risk*

In breach? Significant fines or up to 10 % of annual turnover

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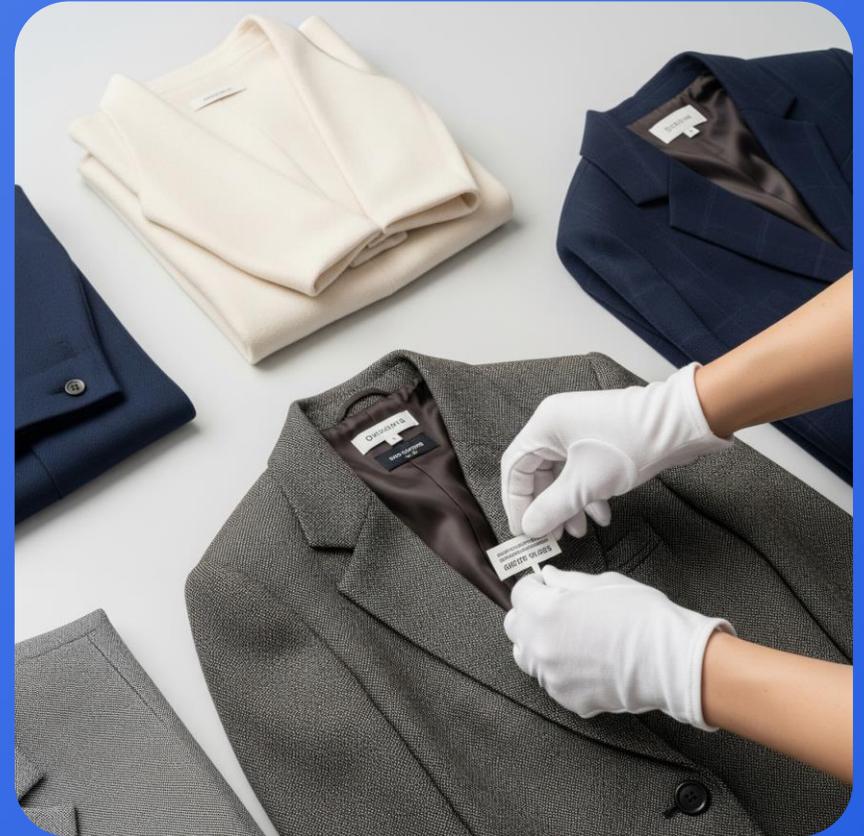
UK: Product Safety & Metrology Act

General Product Safety Regulations 2005, based on the EU's repealed GPSD, continue to apply in UK (excl NI)

21 July 2025: UK 'PRAM' receives royal assent and becomes law

- enables Secretary of State to regulate product marketing, use
- possible rules for production, components (incl intangibles), marking, online marketing, certification *through secondary legislation*
- Government reserves power to independently update product safety rules, allowing for alignment with or divergence from EU standards

Expect Government to promptly lay secondary legislation establishing substantive requirements for online marketplaces

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US: Mandatory eFiling of Certificates

Deadline: 8 July 2026 (imports); 8 Jan 2027 (FTZ)

- Imports of products under the CPSC's remit, incl de minimis imports
- Importers must electronically file their compliance certificates (GCC/CPC) with CBP
- Includes apparel and textiles, which must comply with applicable CPSC standards such as flammability regulations under the Flammable Fabrics Act (FFA)
- Preemptive filing - certificates must be filed with CPSC electronically upon entry to the US v. previous practice of presenting certificates only upon request

Aim: close loopholes; intercept high-risk product entry

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Lets Talk

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