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Beyond The Label: A Guide To Product Compliance In Fashion & Textiles

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01. About The Authors



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Emilia is a Senior Regulatory Compliance Specialist with over 7 years of experience in the legal compliance sector.

She joined Compliance & Risks in 2017 and is now a Senior Team Leader. As a senior regulatory compliance specialist, she is keen to keep clients up to date on global regulatory developments, with a particular focus on her areas of expertise which include consumer protection, textiles, data protection as well as industrial machinery.

Emilia graduated cum laude with a Master's Degree in Law at the University of Catania, Italy, and holds a Postgraduate Diploma in Legal Professions. She has worked for several legal offices in Italy where she has gained extensive experience in private practice.

01. About The Authors



Joyce Costello, Senior Regulatory Compliance Specialist, Compliance & Risks

Joyce is a regulatory professional with extensive experience in researching and assessing global environmental and product safety regulations, particularly in the electronics sector.

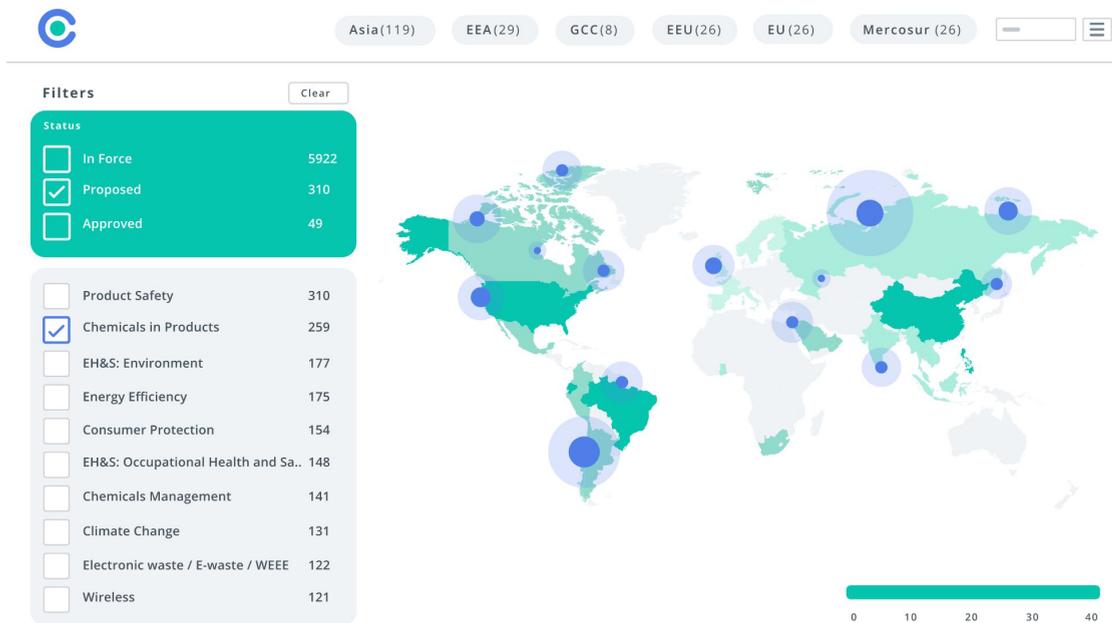
Joyce is currently a Senior Regulatory and Compliance Specialist in the Global Regulatory Compliance Team at Compliance and Risks, which she joined in 2013.

With over ten years expertise in global RoHS legislative and product safety conformity assessment requirements, Joyce works closely with customers to assist them in understanding the implications of evolving regulation on their products.

Joyce has a BCL and LLM from University College Cork, and also holds a Higher Diploma in French.

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01. Introduction

The fashion and textiles industry is in the midst of a significant regulatory transformation.

Staying ahead of these changes is a considerable challenge for companies, as regulations are becoming more numerous and complex. The global regulatory landscape is evolving rapidly, driven by increased demands for sustainability, circular economy practices, and greater transparency.

In the past six months alone, there have been **137 new regulations** in this sector.

This guide, based on the webinar [“Product Compliance in Fashion & Textiles: Navigating New Rules on Labelling, Ecodesign & Environmental Claims”](#) provides a comprehensive overview of the key regulatory developments in product compliance, with a particular focus on labeling, ecodesign, and environmental claims.

Watch the [full webinar](#) for more details.

This guide serves as an essential companion for anyone seeking to understand this evolving legal landscape.

It also delves into horizontal rules like the General Product Safety Regulation (GPSR) and other key updates in the UK and US, aiming to help companies navigate this dynamic landscape and ensure their products remain compliant.

You'll gain practical insights into how regulations are changing across labeling, environmental claims, product safety, and ecodesign, as well as which horizontal frameworks now apply to textile and apparel products.

Whether you're in product development, compliance, sustainability, or legal, this session will help you stay informed and aligned with your global obligations.

02. The Regulatory Landscape

The regulatory environment for the fashion and textile industry is experiencing a rapid and dramatic increase in complexity and volume.

Since 2018, there has been a remarkable **92% increase** in textile regulations globally, with **137 new regulations** emerging in just the last six months.

This growth is not just in quantity but also in the nature of the regulations themselves. They are more intricate and originate from various jurisdictions, making them difficult to track.

This shift is primarily fueled by a greater societal demand for sustainability, a circular economy, and enhanced transparency from companies.

Another notable trend is the imposition of stricter penalties for non-compliance, alongside an increase in enforcement actions and litigations.

This is particularly evident in the area of green claims, where authorities are paying close attention to ensure companies aren't misleading consumers.

This evolving landscape necessitates a proactive approach from companies to implement new tools and processes to stay ahead of the curve.

03. Labeling Requirements

Recent updates to labeling regulations are a significant area of focus for the industry.

The EU is in the process of revising its Textile Labeling Regulation, a process that began in 2023 but has faced delays, with the proposed revision now expected in Q4 of 2025.

Key points of discussion in this revision include updating the fiber names in Annex I, extending the contents of labels to include information on country of origin and allergenic substances, and deciding on the balance between physical and digital labels.

While companies are advocating for digital labels to avoid lengthy, confusing text and accommodate multiple translations, consumer protection agencies are hesitant due to concerns about accessibility for the elderly and those without internet access.

Across the ocean, the American Apparel and Footwear Association (AAFA) filed a petition in February 2025 to allow for digital labeling, though the review by the Federal Trade Commission (FTC) has been delayed.

Meanwhile, other countries are implementing their own labeling rules.

France has established a voluntary "environmental cost" to provide information on the environmental impact of textile products.

In Turkey, a June 2025 amendment requires businesses to disclose information on parts of animal origin in their products, specifically identifying the animal and presenting the information in Turkish on the label or in the e-commerce listing.

Furthermore, Quebec's new trademark language rules, effective June 1, 2025, mandate that generic or descriptive terms within a trademark must appear in French on the product, although a two-year transition period is in place for products manufactured before this date.



04. Addressing Greenwashing & Environmental Claims

The regulation of environmental claims, often referred to as greenwashing, has become a high-priority topic due to increased enforcement actions and penalties.

The EU is leading this trend with two key directives.

The Greenwashing Directive 2024/825, which Member States must transpose by March 2026, amends the Unfair Commercial Practices Directive to expand the list of misleading practices which contain false information in relation to environmental or social characteristics of the products. It prohibits generic environmental claims without demonstrating excellent environmental performance..

It also bans the use of sustainability labels without a recognized certification scheme.

The second directive, the **Green Claims Directive**, is still in a draft form and its finalization is uncertain due to a lack of consensus on several points, including exemptions for microenterprises and the verification process.

This proposed directive would require that all green claims be substantiated with scientific evidence and verified by an independent third party.



Beyond the EU, other countries are also taking action.

Canada has amended its **Competition Act** to require that environmental claims be supported by "adequate and proper testing".

In the UK, a new consumer protection regime from April 2025 strengthens the enforcement powers of the Competition and Markets Authority, with greenwashing being a key area of focus.

Australia has included greenwashing in their **2025-2026 Compliance and enforcement policy and priorities**, while Mexico has a proposed amendment to its Consumer Protection Law to require substantiation of environmental claims.

A notable counter-trend to greenwashing is "**greenhushing**," where companies intentionally avoid publicizing their environmental achievements due to fear of intense regulatory scrutiny.

This practice, however, can lead to a decrease in consumer trust and a lack of transparency in the long run.

05. Ecodesign and the Digital Product Passport

The concepts of circular economy and ecodesign are increasingly central to product regulation.

The number of regulations on these topics has tripled globally, reflecting a growing awareness of the need to create products that minimize environmental impact and remain in the life cycle for as long as possible.

The **EU's Ecodesign for Sustainable Products Regulation (ESPR)**, which became effective in July 2024, is a broad framework that applies to nearly all products on the EU market, including textiles.

The first working plan, published in April 2025, identified textiles as a priority product category for which new ecodesign requirements will be established over the next five years.

These requirements will likely focus on **durability, recyclability, and recycled content**, and could include other textile-specific criteria such as limits to water and energy consumption, resistance to microplastic shedding and modular design.

A core element of the ESPR is the **Digital Product Passport (DPP)**, which will provide improved access to product information.

This is expected to be phased in, with a simplified version by 2027 and a full circular DPP by 2033. The DPP, accessed via a QR code or barcode, will contain a wide range of data, including a unique product identifier, compliance documents, and information about substances of concern.

The ESPR's information requirements are intended to work in synergy with the EU Textile Labeling Regulation to streamline compliance for businesses.

Companies will need to start gathering comprehensive supply chain information now to prepare for these new obligations.

06. The General Product Safety Regulation (GPSR)

The EU's General Product Safety Regulation (GPSR), effective since December 13, 2024, establishes a new baseline safety standard with an extensive scope that includes all textiles, clothing, fashion accessories, footwear, and even used items.

The GPSR introduces three key obligations:

- a basic safety requirement,
- accident reporting, and
- strict traceability.

The **safety requirement** mandates that products be safe by design, requiring manufacturers to perform an internal risk analysis and document the results.

This includes assessing risks for vulnerable consumers like children and the elderly and considering potential chemical dangers.

The **reporting obligation** requires immediate action if a serious safety concern arises.

Companies must inform customers directly and notify EU authorities through the Safety Gate or RAPEX system.

They must also offer remedies such as recall, repair, or a refund.

The **traceability requirements** are designed to strengthen product identification.

Manufacturers and importers must ensure products bear a type, batch, or serial number and include their contact information.

This information must also be available for products sold online.

Importantly, information provided electronically, like via a QR code, cannot substitute for mandatory physical labeling on the product itself, unless the product's size prevents it.

The GPSR also requires a responsible economic operator to be established in the EU for all products sold on the market.

Breaches can result in substantial fines, with penalties in France reaching up to **€600,000 or 10% of annual worldwide turnover**.



07. UK and US Regulatory Developments

The UK and US are also strengthening their product safety frameworks.

In the UK, the **Product Regulation and Metrology Act (PRAM)**, which became law on July 21, 2025, provides a new legal framework for product safety.

Similar to the EU's GPSR, PRAM has a broad scope that covers all fashion items and places greater responsibility on online marketplaces for the safety and authenticity of products sold on their platforms.

The Act is a framework law, meaning that detailed regulations will be established in the future, possibly including rules for smart clothing and wearables. It builds upon the existing General Product Safety Regulations 2005, which remain legally binding.

In the US, a new rule from the Consumer Product Safety Commission (CPSC) requires the **mandatory electronic filing of conformity certificates** for all regulated consumer product imports, including apparel and textiles, starting July 8, 2026.

This process, known as e-filing, applies even to small shipments for direct e-commerce sales. It mandates that importers electronically file a General Conformity Certificate (GCC) or Children's Product Conformity Certificate (CPC) with US Customs and Border Protection at the time of entry.

This change aims to improve enforcement efficiency and allows the CPSC to more effectively target high-risk products.

Importers of non-compliant shipments will face increased scrutiny and a greater risk of having their products flagged for inspection.

08. Webinar Q&A

During the live webinar, numerous questions were sent in by our live audience. Our webinar presenters, [Emilia Assenza](#) & [Joyce Costello](#), provided expert answers to the most popular queries below.

Q1. Do we have EPR obligations/requirements for textiles in the EU scenario?

The EPR scheme for textiles has been approved as an amendment to the Waste Framework Directive on 9 September 2025 by the EU Parliament.

The law will now need to be signed by both the Council and the Parliament prior to its publication in the Official Journal.

Member States will then have 20 months (from the entry into force of the Directive) to transpose the rules into national legislation. EPR schemes will have to be set up by each Member State within 30 months.

Q2. Do you think that the French Eco Score timelines might shift as we are very close to 2026 already and not many companies seem to be using this yet? How will this be monitored?

The French environmental cost for textile products was officially introduced on 9 September 2025, with the publication of two pieces of legislation, one Decree and one Order, in the Official Journal. The display of the environmental cost will apply from 1 October 2025 on a voluntary basis.

To date, there is no official timeline regarding its mandatory implementation. From multiple sources available online, yet unofficial, the scheme won't be made mandatory before April 2026.

Additionally, it is worth noting that although voluntary, starting from 1 October 2026, third parties may calculate the environmental cost of a product, based on available data, if the operators haven't done so. This provision serves as an incentive for operators to determine the environmental cost of their products themselves.

Q3. Does France's ecoscore need to be on the product at the time of sale? If so, do we have the option to put this on a label, hangtag, or printed onto the product?

According to the Decree establishing the French environmental cost, "the environmental cost shall be accessible at the time of purchase of the product."

Additionally, Article 8 of the Order states that:

"Where the environmental cost is presented in physical stores or online, the size of this graphic representation shall be at least equivalent to the font size of the price figures in stores.

Where the environmental cost is affixed, by means of marking or labelling, to a unit of product or to its packaging, the size of this graphic representation must be visible and legible.

Regardless of the physical or digital medium used, the size of this graphic representation shall be at least equivalent to that of any other aggregate environmental impact score that is voluntarily communicated on the same product reference."

Q4. Is France's Eco Score linked to their PEF? Or is this a separate requirement? French PEF is voluntary due to the EU ruling preventing it from being mandatory, however is this a requirement under AGECE or other legislation?

- **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 % 2B 2 environmental indicators**
- **Ecobalyse platform launched by government**

The methods for the calculation of the French Environmental Cost are laid out in Articles 3-7 of the Order and are based on the environmental indicators as listed in Article 5. The list includes the 16 EU impact categories as per Recommendation (EU) 2021/2279 on the PEF method as described in its Annex 1.

In addition to the above-mentioned categories, two other impact categories have been added by France: "export outside the EU" and "Microfibres emission".

Q5. Does France's ECO score apply to all textile products or only clothing? Will there be a scope similar to the 80% by weight requirement from the current textiles legislation?

In accordance with Article 1 of the Order, the products in scope of the French environmental cost are those within the scope of Regulation (EU) No. 1007/2011, with the exception of the following products:

- textile products not used for clothing, such as household linen and covers;
- single-use textile clothing products;
- textile clothing products containing electronic components;
- textile clothing products for which more than 20 % of the mass consists of materials for which the modelling of the contribution to the calculation of the environmental cost is not included in the methodological note.

Q6. Would you be able to clarify legislation on what types of textiles are identified as waste (and therefore also 'taxed!') when shipping around the world to e.g. recycling centers. Are mono materials not waste and blended waste, any information source clarifying this would also be appreciated, thanks!

The proposed EU EPR scheme for textiles, introduced as a revision to the Waste Framework Directive, provides some clarification on the definition of textile waste.

According to the proposed amendment, Member States should ensure that all separately collected textiles are subject to sorting operations and meet the end-of-waste criteria for reuse before their shipment (generally shipped as used textiles under HS code 6309) - this is to reduce the practice of illegal waste shipments to non-EU countries, often disguised as intended for reuse.

Unsorted textiles and those that do not meet the end-of-waste criteria for reuse are considered as waste. This amendment will in fact complement the provisions of the EU Waste Shipment Regulation which prevents the shipment of textile waste when there is no guarantee that it will be managed in an environmentally sound manner.

General end-of-waste criteria are set out in Article 6(1) and (2) of the Waste Framework Directive. Furthermore, the EU Commission's Joint Research Centre (JRC) is currently working on elaborating technical proposals for end-of-waste criteria specific to textiles.

Q7. In relation to e-filing, Can the contact person who collects reports be based outside the US? Also, about Manufacturer data, is it mandatory to indicate the supplier's name and address, or can a mid code be used?

Yes, the contact person who collects and maintains records of test results for can be based outside the United States.

One of the data elements of the CPSC's eFiling rule is "Point of Contact." This element requires the name, full mailing address, and telephone number of the individual responsible for maintaining the test records. The regulations do not however specify that this individual must be located within the U.S. What is required is sufficient details enabling the CPSC to make contact for compliance verification.

The CPSC has detailed a specific set of data points that must be submitted electronically as part of the Certificate, including the name and location of the product's manufacturer.

The data elements required are specified in the Code of Federal Regulations, Title 16 – Commercial Practices, Part 1110 of the Consumer Product Safety Act Regulations, [here](#) and [here](#).

This clarifies that the PGA Message Set requires the explicit identity and full address of the manufacturing party - codes or abbreviations are not accepted substitutes, including MID codes.

In further support of the above, please refer to Record Identifier PG19-PG 21 in the CPSC eFiling Implementation Guide – Version 2.2.

Q8. Are there any Harmonization efforts for Textile labels for all the different global requirements. Having to do separate labels for different countries is counter-intuitive to any sustainability goals.

Unfortunately a global harmonization of labelling requirements for textiles is still a distant goal. To date, several differences still exist across regions with regard to the information required on the label. And the discrepancies seem to have become even wider now due to the addition of sustainability/environmental data, where some geographies are progressing more rapidly than others.

While there are international frameworks and standards available, they are voluntary and generally cover single aspects of labelling (such as care, sustainability, environmental performance etc.).



09. Conclusion

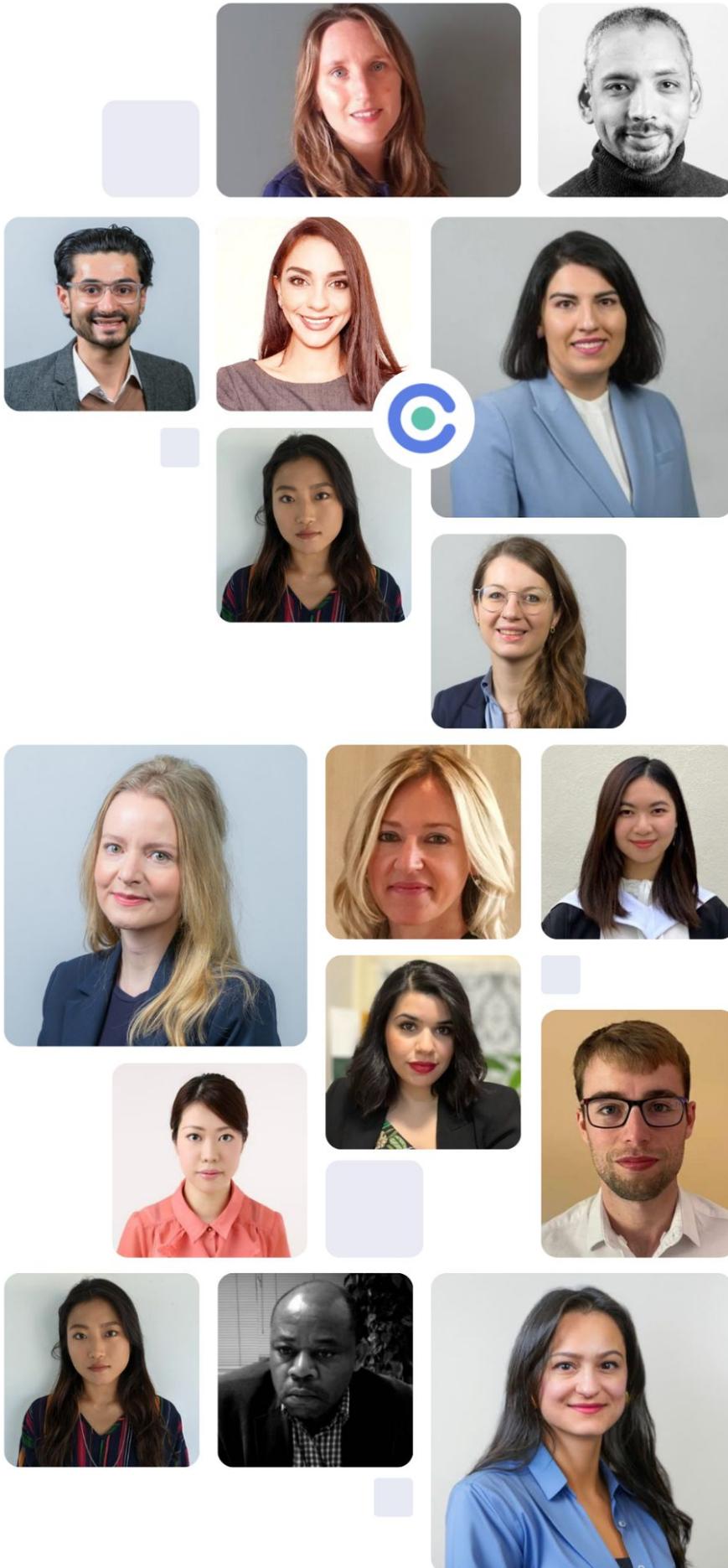
The fashion and textiles industry is at a critical juncture, with new regulations emerging globally that demand a higher standard of compliance, transparency, and product safety.

The key themes discussed in this guide - labeling, greenwashing, ecodesign, and product safety - are intertwined and collectively push the industry toward more sustainable and responsible practices.

From the EU's Digital Product Passport and GPSR to the UK's PRAM Act and the US's mandatory e-filing, companies must be proactive in adapting their internal processes and supply chain management to meet these new obligations.

The sheer volume and complexity of these rules necessitate a comprehensive approach to compliance.

By understanding and preparing for these changes, businesses can not only mitigate risks and avoid penalties but also build consumer trust and position themselves for growth in an increasingly regulated world.



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