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# Finnish Textile & Fashion Association's supports policy option 2 reg. TLR revision

*Finnish Textile and Fashion takes a positive view on the revision of textiles' labelling rules in the EU as initiated by European Commission. This revision should take a holistic view on labelling of textiles but also make the current regulation up to date, accompanied with a guiding document.*

*Textile and clothing companies often sell products in multiple markets, which makes complying to current non-harmonized rules burdensome. We need rules on what is mandatory and what is not for the whole EU and harmonized ways to label textile products. This would benefit both consumers and companies.*

## **PROPOSED POLICY OPTION 2 IS SUPPORTED BY THE FINNISH INDUSTRY**

Finnish Textile & Fashion Association generally supports the proposed policy option 2 in the background document for the final stakeholder consultation. This option would bring much needed improvement from the industry and consumer perspective. Option 2

- shows alignment with other future legislation and international standards,
- adds labelling requirements which are already being done by the industry,
- harmonizes labelling requirements,
- supports the development of novel textile fibres and
- supports consumers making informed decisions

## **TEXTILE LABELLING REGULATION NEEDS A REVISION**

Fibre composition is very important information to consumers. It helps to make better and more informed choices based on the material composition. We support the EU Commission's intention to revise the Textile Labelling regulation 1007/2011, which needs bringing up to date through legislative actions supported by guiding documents.

- To speed up green transition, the adoption of new textile fibre generic names should be more straightforward. Currently, the process takes years to complete and is not transparent. This is especially the case for new man-made cellulosic fibres. **We support measures 2.9 and 2.10.**

Companies developing new, more sustainable textile fibres wish to distinguish their products from the ones already on the market. This needs to be possible when the manufacturing process *or* fibre characteristics differ from the ones listed in Annex I.

**We support measure 1.1 aligning generic names with international standards such as EN ISO 2076 Textiles. Man-made fibres. Generic names**

- The presence of recycled fibres should be included in the labelling rules and the ways of marking standardized. Currently companies are interpreting the regulation differently, which leads to miscellaneous labelling.  
Also, the fibre tolerance should be bigger for recycled content. This would benefit the textile recycling industry and circular products. **We support the tolerance level at 5 % as in measure 1.5.**
- Feather and down should be included in the same regulation. Currently what is required does not work and companies haven't adopted the wording "*contains non-textile parts of animal origin*". To avoid parallel regulation, apparel items from leather and fur should be added to the same regulation. **We support measures 2.3 and 3.2.** regarding the scope expansion.
- **We support measure 2.6** and the revision of Annex V through a conceptual approach.
- The rules for additional information about fibre composition are not clear to companies. This option should be voluntary but be guided through. Additional information often refers to the fibre origin, manufacturing methods such as organic content, certificates, recycled content and fibre brand names. **We support both measures 1.6 and 1.7.**

#### **SMALLER AND MORE DURABLE PHYSICAL LABELS AND ADDITIONAL INFORMATION TO DPP**

Both consumers and companies are in need for longer lasting, smaller labels, which consumers will not cut off the product. And yes, a physical label is still needed in the

future. But it could be smaller if we moved part of the information to a digital form, preferably to future DPPs for product groups, which have a DA under ESPR. The minimum information on a physical label could be fibre composition, care instructions and size. **We support measure 3.2.**

Labels should have also minimum durability requirements so that they'd have the same lifetime as the product. Currently physical labels are of poor quality, uncomfortable to consumers, and many even unreadable. Also, if there is too much information on the label, consumers are very likely to cut it off, which means loss of all information. **We support the revision of article 14.**

#### **LANGUAGE REQUIREMENTS SHOULD BE MODERATED**

Companies are struggling to add all required languages to physical labels, and this leads to frustratingly long labels. Language requirements should be moderated in textile labelling. One solution could be, for example, writing fibre composition using international textile fibre abbreviations on physical label. Different and optional languages could be in a digital form. **We support in general measure 3.5** especially if it would have international acceptance.

#### **MADE IN -MARKING AND SIZE SHOULD BE MANDATORY AND SIZE SYSTEMS HARMONIZED IN THE EU**

The origin of textile product and made in -marking has been a hot topic for many years. Finnish Textile & Fashion sees that made in -marking could be mandatory in EU. Most companies already add it voluntarily, as this is something the consumers expects from them. However, rules of origin are maybe not so fitting for textile products, as the value chains are diverse, and the actual origin is often several countries. **We support measure 3.2.**

Size markings should also be mandatory for all apparel. **We support measure 3.2 regarding size measurements.**

## CARE INSTRUCTIONS SHOULD BE HARMONIZED IN THE EU

Currently EU countries have different rules for textile products' care instructions, and in some countries, it is not even mandatory to include care instructions in a textile product. This would be an easy fix. We already have a standardized way of marking care instructions for textile products, using standardized ISO 3758 symbols. We should take full advantage of this standard and require all member countries to use these symbols for care instructions.

Finland has also been using a national standard for written care instructions and translations into several languages. This has been a very useful document if a company has chosen to use written care instructions instead of symbols. And in many times, additional written instructions are needed. Similar EN standard would solve this problem.

All in all, it is a very easy step to harmonize care labelling for textiles for the whole EU using standardized symbols added with standardized verbal instruction when necessary.

**We support measure 3.2 regarding care labelling.**

## SUSTAINABILITY & CIRCULARITY INFORMATION IS IMPORTANT BUT SHOULD BE MOSTLY SEPARATELY

Although sustainability and circularity information about textile products is very important, especially to consumers, it should not be included in this same revision of labelling rules. Information about durability, recyclability, chemical substances, emission of unintentional microplastics, carbon environmental footprint etc. should be aligned with ESPR's future product information rules and included in the DPPs. However, no additional similar national labelling requirements should be allowed after the adoption of textile products' delegated act.

more information:

Katri Pylkkänen  
Advisor / Textiles & Sustainability  
Finnish Textile & Fashion Association  
[katri.pylkkanen@stjm.fi](mailto:katri.pylkkanen@stjm.fi)