

Finnish Textile & Fashion Association supports harmonization of labelling rules in EU and new labelling domains

Finnish Textile & Fashion supports the European Commission's revision of the Textile Labelling Regulation (TLR). The reform is necessary to modernise outdated rules, improve legal certainty, reduce fragmentation across Member States, and strengthen market access for companies operating in multiple EU countries. Harmonised, clear and future proof rules are essential to support both consumers and businesses.

KEY MESSAGES

1. Streamline approval of new fibre generic names and update fibre-related rules
2. Modernise scope and product definitions in Annexes V and VII
3. Make care labelling mandatory and harmonize rules across EU member states
4. Essential product information to physical labels, additional to a digital format
5. Make made-in and size labelling mandatory across the EU
6. Harmonise the TLR with ESPR and international standards

TEXTILE LABELLING REGULATION NEEDS A REVISION

Fibre composition is very important information to consumers. It helps to make 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 to be brought up to date through legislative actions supported by guiding documents.

- 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.

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. Therefore, Finnish Textile & Fashion supports simplification and streamlining of the application process for new fibres.

Furthermore, Finnish Textile & Fashion supports aligning Annex I, which lists generic fibre 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. Currently companies are interpreting the regulation differently, which leads to miscellaneous labelling. In addition, the fibre tolerance should be bigger for recycled content. This would benefit the textile recycling industry and circular products. Finnish Textile & Fashion supports the tolerance level of recycled fibres to be increased to 5 percent.
- Feather and down should be included in the same regulation. Currently what is required does not work and companies have not adopted the wording "*contains non-textile parts of animal origin*". We support the revision of article 12 to require information on all non-textile parts, of either animal origin or not.

Furthermore, to avoid parallel regulation, apparel items from leather and fur could be added to the same regulation, so that the scope of the regulation would be expanded.

- Finnish Textile & Fashion supports the revision of TLR's Annex V through a conceptual approach, which makes it more future proof. Annex V lists all products for which the labelling the fibre composition is not mandatory.

In addition, Annex VII should be revised, as currently it is not clear which items are not to be considered for the determination of fibre composition.

- The rules for additional information about fibre composition are not clear to companies. Additional information often refers to fibre origin, manufacturing methods such as organic content, certificates, recycled content and brand names. This option should be voluntary with guidance.

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 mandatory to include care instructions in a textile product. The revision of textile labelling rules must contain harmonized rules for care instruction for textile products.

Internationally, there already is a well-known and standardized way of marking care instructions for textile products, using EN-ISO 3758 symbols (Ginetex symbols). The commission should take full advantage of this and require all EU member countries to use this care symbols system as a default. The use of Ginetex symbols could be voluntary and companies could have freedom to choose either symbols or written care instructions.

For example: Finland has a national standard for written care instructions and translations into several languages. This has been a very useful document if a company chooses to use written care instructions instead of symbols or wants to write additional care instructions. Similar EN standard would harmonize written care instructions across EU.

MADE IN -MARKING AND SIZE SHOULD BE MANDATORY

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 for textile products should be mandatory in EU. Most companies already add it voluntarily, and this is something consumers often expect. However, rules of origin are maybe not so fitting for textile

products, as the value chains are diverse, and the actual origin is often in several countries.

Size markings should also be mandatory for all apparel, as this is already something that companies add to labels and consumers expect to have. This should be added to the labelling rules.

SMALLER AND MORE DURABLE PHYSICAL LABELS – ADDITIONAL INFORMATION TO A DIGITAL FORM

Both consumers and companies are in need for longer lasting, smaller labels, which consumers will not cut off the product. A physical label is still needed in the future, but it could be smaller if part of the information were moved to a digital form, preferably to future DPPs for product groups, which have a DA under ESPR. The minimum information on a physical label should be:

- fibre composition,
- care instructions and
- size.

Labels should have also minimum durability requirements so that they have the same lifetime as the product. Currently physical labels are of poor quality, uncomfortable to consumers, and many even unreadable. If there is too much information on the label, consumers are very likely to cut it off, which means loss of all information. This should be clearly stated in the regulation's article 14.

In addition, language requirements in labels should be moderated. Companies are struggling to add all required languages to physical labels in textile products, and this is the main reason for frustratingly long labels. One solution could be to write fibre composition using international textile fibre abbreviations on physical label, especially if it would have international acceptance. Optional languages could be in digital form.

SUSTAINABILITY & CIRCULARITY INFORMATION SHOULD BE REGULATED SEPARATELY

Although sustainability and circularity information about textile products is very important, it should not be included in this same revision of labelling rules. Information

about durability, recyclability, chemical substances, microfibre fragmentation, environmental footprint etc. should be aligned with ESPR's future product information rules and included in the DPPs.