

ESPR for Textiles

Implications of ESPR, DPP, circularity, substances of concern and supply-chain transparency for apparel and textile products

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SCOPE	ESPR Working Plan 2025-2030, Digital Product Passport, substances of concern, data readiness and business impact for textiles
AUDIENCE	Manufacturers, importers, brand owners, regulatory affairs, product stewardship, sustainability, R&D, procurement, quality, IT/data and board-level decision-makers

CORE THESIS

Textiles are one of the flagship product groups of the first ESPR Working Plan. For apparel and textile companies, ESPR is not only a product-design challenge. It is a supply-chain transparency, substances governance, durability, circularity and Digital Product Passport transformation.

Legal note: This white paper provides strategic orientation and does not constitute legal advice. Concrete obligations will depend on future delegated acts, harmonised standards, guidance, product scope, market role and company-specific facts.

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1. Executive Summary

Textiles is one of the priority final product groups identified in the first ESPR and Energy Labelling Working Plan 2025-2030. The Working Plan does not yet create final product-specific obligations, but it signals where the Commission will consider future ecodesign and information requirements through delegated acts.

The EU Textiles Strategy identifies textiles as a high-impact consumption category and sets a 2030 vision in which textile products placed on the EU market are durable, repairable, recyclable, to a great extent made of recycled fibres, free of hazardous substances and produced with respect for social rights and the environment.

The Working Plan prioritises textiles, with a focus on apparel, for future ecodesign requirements. Product information will mainly be made available through Digital Product Passports.

EXECUTIVE INSIGHT

For textiles, ESPR readiness should start before the delegated act is finalised. The hardest work is usually not interpreting the legal text, but building reliable product, material, supplier, sustainability and end-of-life data.

2. Regulatory Background and Working Plan Status

ESPR is a framework regulation. Concrete requirements are developed product group by product group through preparatory studies, impact assessments, stakeholder consultation, Ecodesign Forum discussions and delegated acts.

The first Working Plan identifies priority products for the 2025-2030 period and also announces horizontal measures on repairability and recyclability. Product information will mainly be made available through the Digital Product Passport or, for energy-labelled products, through EPREL where relevant.

3. Why This Product Group Matters

The EU Textiles Strategy identifies textiles as a high-impact consumption category and sets a 2030 vision in which textile products placed on the EU market are durable, repairable, recyclable, to a great extent made of recycled fibres, free of hazardous substances and produced with respect for social rights and the environment.

The business impact is therefore broader than regulatory compliance. It affects product design, material choices, supplier qualification, sustainability claims, data systems, customer transparency and end-of-life strategy.

4. Expected Requirement Areas

REQUIREMENT AREA	TOPICS CURRENTLY DISCUSSED WITHIN POLICY, PREPARATORY AND LEGISLATIVE DEVELOPMENT PROCESSES	EVIDENCE COMPANIES SHOULD START BUILDING
Durability and quality	Minimum durability, colour fastness, dimensional stability, tear resistance and useful-life expectations.	Test data, product specification and quality claims governance.
Repairability and reuse	Design and information that supports repair, reuse and longer product life.	Care instructions, repair information, spare parts/accessories and service model data.
Fibre composition and recyclability	Clear fibre data, mono-material strategies where feasible and recycling-compatible design.	BOM, fibre composition, trims, coatings, prints, labels and recyclability assessment.

REQUIREMENT AREA	TOPICS CURRENTLY DISCUSSED WITHIN POLICY, PREPARATORY AND LEGISLATIVE DEVELOPMENT PROCESSES	EVIDENCE COMPANIES SHOULD START BUILDING
Recycled content	Potential requirements or claims relating to recycled fibres and feedstock origin.	Chain-of-custody documentation and supplier certificates.
Substances of concern	Control of hazardous substances and SoCs in fibres, dyes, finishes, coatings and accessories.	Chemical inventory, supplier declarations and restricted substances screening.
Digital Product Passport	Product-level digital record for composition, origin, sustainability and end-of-life information.	DPP data model, supplier data and public/restricted data layers.

5. Substances of Concern and Materials Governance

For textiles, substances of concern are a strategic ESPR issue because they can affect product safety, circularity, recycling, reuse, durability and DPP disclosure. Companies should connect REACH, CLP, SCIP, supplier declarations and product BOM data into one evidence model.

- Map substances and materials by component and supplier.
- Identify substances that may affect recycling, reuse or recovered-material quality.
- Establish supplier update obligations for regulatory changes.
- Define public, customer, authority and confidential data layers for future DPP disclosure.

6. Digital Product Passport Readiness

where required by future delegated acts or other applicable Union legislation

The Digital Product Passport should be treated as a data governance system, not as a QR-code project. The visible passport is only the front end of a controlled evidence architecture.

DPP DATA DOMAIN	TYPICAL CONTENT	SOURCE SYSTEMS	RISK
Product identity	Model, SKU, product category, manufacturer, economic operator.	ERP, PLM, PIM.	Inconsistent product master data.
Material composition	Main materials, components, additives, coatings and trims.	BOM, supplier declarations.	Incomplete supplier data.
Sustainability data	Environmental footprint, recycled content, durability and circularity metrics.	LCA, ESG, quality systems.	Unsupported claims.
End-of-life information	Repair, reuse, disassembly, sorting, recycling and collection guidance.	Service, recyclers, waste partners.	Mismatch with real infrastructure.
Compliance evidence	DoC, technical file, test reports, SoC and standards references.	Regulatory and quality systems.	Weak audit trail.

7. Business Impact and Risk Areas

Fragmented tier-2 and tier-3 supplier data

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Inconsistent fibre composition and material-origin records.

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High claim risk around recycled content, low-impact materials and circularity.

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Insufficient chemical and finishing-agent transparency.

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DPP data gaps across seasonal collections and private-label supply chains.

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8. Enterprise Readiness Roadmap

PHASE	OBJECTIVE	KEY ACTIVITIES	OUTPUTS
1. Discover	Map exposure and current data maturity.	Product portfolio, suppliers, materials, variants and claims scan.	Readiness heat map.
2. Prioritize	Focus on high-volume and high-risk products.	Rank by material complexity, SoC risk, supply-chain opacity and DPP relevance.	Priority roadmap.
3. Build evidence	Create reliable data foundations.	BOM enrichment, supplier templates, test evidence and sustainability metrics.	Evidence repository.
4. Engage	Influence requirements while still in development.	Ecodesign Forum input, industry associations and technical papers.	Advocacy package.
5. Implement	Prepare for delegated acts and DPP.	Design changes, data workflows, technical files and DPP pilot.	Operational compliance model.
6. Operate	Maintain continuous readiness.	Regulatory monitoring, supplier updates, audits and executive reporting.	Compliance dashboard.

9. Advocacy and Stakeholder Engagement

Advocacy opportunities are strongest before delegated acts are finalised. Companies should provide evidence on technical feasibility, environmental benefit, testing methods, costs, market structure, SME impacts and realistic transition periods.

- Participate in relevant preparatory studies and stakeholder meetings where available.
 - Coordinate technical positions through industry associations.
 - Develop evidence-based position papers on feasibility, thresholds and transition periods.
 - Engage suppliers and recyclers to validate practical circularity claims.
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- Monitor Ecodesign Forum outputs and delegated-act drafts.

10. Board-Level Priorities

- Treat ESPR as a product-strategy and data-governance transformation.
- Map affected products and suppliers against the ESPR Working Plan.
- Start DPP and material-data readiness before delegated acts are final.
- Build a substances-of-concern control framework.
- Integrate sustainability and circularity criteria into product development stage gates.
- Prepare evidence-based advocacy positions during consultation windows.
- Create an executive ESPR timeline and risk dashboard.

11. Outlook and Conclusion

ESPR will progressively change how textiles products are designed, documented, sold, repaired, reused and recycled in the EU market. Companies that prepare early can reduce compliance disruption and strengthen their sustainability position with verified evidence.

FINAL MESSAGE

For textiles, ESPR readiness is data readiness, supplier readiness and product-design readiness. The delegated act will define the legal obligation, but the capability must be built before then.

References

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