

Liberté, Égalité, Fraternité, Durabilité

A Primer on Textiles EPR in France & Beyond

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Stacey Bowers

Manager, Global Market Access
Compliance & Risks



Vish Karasani

Product Marketing Manager,
Compliance & Risks

Overview

1. About Compliance & Risks
2. France's AGEC, Triman and “sorting info”
3. Netherlands' Decree on EPR for Textiles
4. Green claims in the EU and US
5. Proposals on textile waste in Sweden and Bulgaria
6. Bills on textiles EPR in California and New York State
7. Introducing C2P - Holistic Market Access Solutions



Mission Statement



Ensure global companies have the tools & information to build safe, sustainable, products in a world full of change

Trusted by the World's Leading Brands

PVH

YOOX
NET-A-PORTER
GROUP

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TOSHIBA

SAMSUNG



FUJITSU

BOSE

TESLA

KOHLER

logitech

XEROX®

Thermo
SCIENTIFIC

SONY

GARMIN



85k.
Regulations

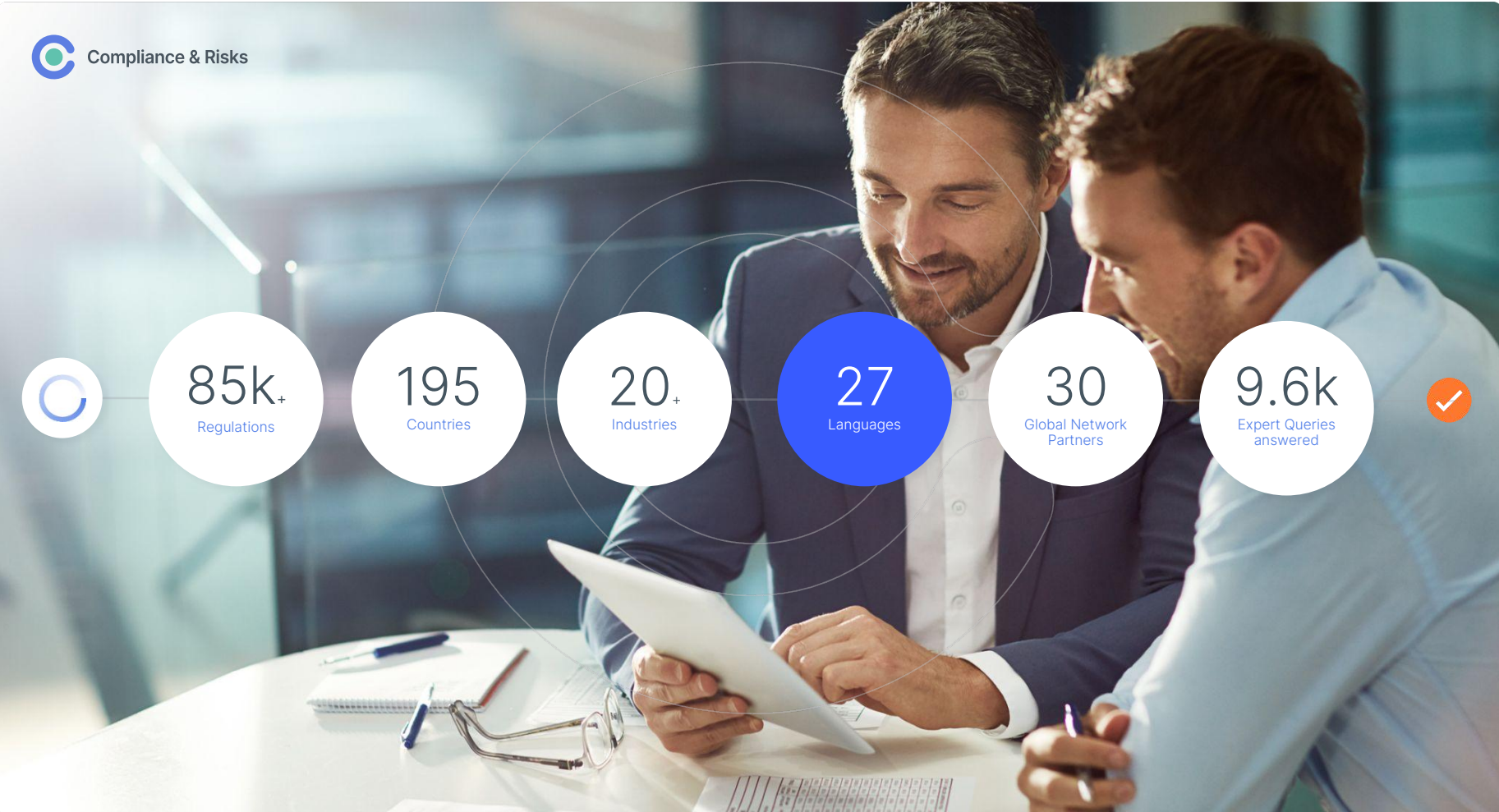
195
Countries

20+
Industries

27
Languages

30
Global Network
Partners

9.6k
Expert Queries
answered



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.



France's AGEC

- In 2020, France enacted Law no 2020-105, relating to the fight against waste and the circular economy
- The Law, commonly called "AGEC":
 - Promoted the general reduction of waste and the circular economy and
 - Set out the legal framework to eliminate waste and reuse existing resources as much as possible
- AGEC also introduced Article L541-9-3 to the French Environmental Code, listing products subject to EPR, including clothing, household linens and shoes

Triman & 'sorting info'

- The Triman symbol indicates the product is subject to recycling
- "Sorting information" provides recycling instructions:
 - A pictogram symbolizes the product category(ies):
 - Clothing (t-shirt),
 - Household linens (folded towel) and/ or
 - Footwear (tied derby shoes)
 - The self-deposit bank is symbolized by the pictogram of a container
 - A link to the Ministry of Ecology and Energy's website
 - The letters "FR" specify this measure is governed by French regulations



quefairedemesdechets.fr

Refashion guidance on deadlines

- Refashion, the French eco-organization in charge of EPR for clothing, household linens and footwear, has provided extensive guidance on the Triman symbol and sorting info
- The Triman and sorting info has been required on all items of clothing, home textiles and footwear from 1 January 2022 and by 1 February 2023 at the latest
 - 1 August 2023 for products manufactured or imported before 1 February 2023



French Decree on environmental characteristics

- In 2022, France enacted Decree No. 2022-748, relating to consumer information on the environmental qualities and characteristics of waste-generating products
- The Decree was enacted under AGECE
- The Decree requires labeling to indicate the environmental characteristics of covered products, which include packaging, clothing, home textiles and footwear

Textile labeling requirements

- The percentage of recycled materials in the product;
- The statement "Contains a dangerous substance," for every substance present in a concentration $>0.1\%$ by weight;
 - The statement, "Contains a substance of very high concern," and the name of the substance, if the substance is a REACH SVHC;
- Traceability information for woven, dyed and printed, or manufactured textiles;
- A statement, "Releases microfibers into the environment during washing," when the proportion of synthetic fibers is $>50\%$; and
- Recyclability of the product



Compliance timeline

Timeline for compliance with Decree No. 2022-748	
1 January 2023	<ul style="list-style-type: none">• The largest companies - those reporting an annual turnover of greater than €50 million and placing at least 25,000 units on the market - were liable
1 January 2024	<ul style="list-style-type: none">• Companies with an annual revenue of greater than €20 million and which place at least 10,000 units on the market
1 January 2025	<ul style="list-style-type: none">• The smallest companies - with an annual revenue of more than €10 million and at least 10,000 products on the market - will be liable

EU's infringement procedure against France

- In February 2023, the EU Commission pursued legal action against France

...[T]he imposition of national-specific labelling requirements risks undermining the principle of free movement of goods and can lead to counterproductive environmental effects.

Such measures can also lead to increased material needs for additional labelling and additional waste produced due to larger than necessary sizes of the packaging.

France is also in breach of the notification obligations under the Single Market Transparency Directive...to the extent that the law was not notified to the Commission at a draft stage, prior to adoption.

- France had until April 2023 to address these concerns

Dutch Decree on Textiles EPR

- On 14 April 2023, the Netherlands approved the Decree on Extended Producer Responsibility (EPR) for Textiles
- The Decree is set to enter into force 1 July 2023
- Producers are required to finance and implement a system to collect, recycle, reuse and properly dispose of waste from textiles they bring to market
- Additionally, the producer shall ensure measures are taken to incorporate the greatest amount possible of post-consumer recycled textile fibers in new textile products

Reporting obligations

- Annually by 1 August, the producer shall submit a report to the Minister of Infrastructure and Water Management, providing data on compliance, implementation of the intake system and information obligations
- Reports for 2023 and 2024 will be sufficient, provided they show the quantity of textile products that were placed on the market



EPR targets

EPR targets per the Decree on EPR for Textiles	
2025	<ul style="list-style-type: none">• The share of recycled (post-consumer)/ sustainable materials in textile products is 25%• 30% of (raw) materials and products sold in Netherlands are recycled after collection, if immediate reuse is no longer possible
2030	<ul style="list-style-type: none">• All textile products contain 50% sustainable materials, of which at least 30% is recycle and no more than 20% is sustainable material• 50% of (raw) materials and products sold in Netherlands are recycled after collection, if immediate reuse is no longer possible
2035	The ecological footprint of the textile sector should be halved in the fields of emissions, water consumption, chemicals and microplastics
2050	Fully circular economy

EU Parliament takes on fast fashion

- In April 2023, EU Environment Committee MEPs adopted recommendations to ensure textiles are produced in a circular, sustainable and socially just way
- Per their press release:
 - Textile products must last longer and be easier to reuse, repair and recycle;
 - The destruction of unsold or returned textiles should be banned;
 - Human, social and labor rights must be respected during production; and
 - Binding targets and measures addressing the entire lifecycle of textiles are needed
- The recommendations are based on the 2022 EU Strategy for Sustainable and Circular Textiles

EU Commission takes on green claims

- In March 2023, the EU Commission proposed a Directive on Green Claims
- The Directive would ensure consumers receive reliable, comparable and verifiable environmental information on products, including:
 - Clear criteria on how companies should prove their environmental claims and labels;
 - Requirements for these claims and labels to be checked by an independent and accredited verifier; and
 - New rules on solid, transparent and reliable environmental labeling schemes
- The EU Parliament also recently approved a proposed Directive on Empowering Consumers for the Green Transition
- The proposal addresses generic environmental claims, such as "environmentally friendly," "eco-friendly," "eco" and "green"

Sweden's proposal on circular handling of textile waste

- On 4 May 2023, Sweden's Government Office published a proposal for new circular handling of textiles and textile waste
- The proposal would require consumers to recycle textile waste
- Swedish municipalities would be responsible for the collection of textile waste that is municipal waste, including deciding how the collection system should be designed, as well as providing information on how to reuse textiles in the best way
- The proposal is being referred to stakeholders, with comments due at the end of August

US FTC considers Green Guides update

- In March 2023, the US FTC announced a regulatory review of its Guides for the Use of Environmental Marketing Claims (the "Green Guides," 16 CFR 260)
- The review will examine:
 - The current state of recycling practices and recycling-related advertising in the US;
 - Consumer perception of current and emerging recycling-related claims; and
 - The need for any updates or other changes to the Green Guides related to recycling claims
- FTC will host a workshop on 23 May 2023
- Comments are due 13 June 2023

Bulgaria's draft on footwear & textile waste

- In July 2022, the Bulgarian Council of Ministers published a Draft Regulation on the Management of Footwear and Textile Waste
- Persons who place textiles and footwear on the market would be responsible for the separate collection, transportation, storage, preparation for re-use, recycling, utilization and disposal of waste textiles and footwear
- These objectives would be implemented annually, in increasing percentages, from 31 December 2023 through 31 December 2025

California's proposed SB 707

- California's Senate is considering SB 707, Responsible Textile Recovery Act of 2023
- The bill applies to textile articles that are unsuitable for reuse by a consumer in their current state or condition
- Producers, either independently or through the creation of one or more stewardship organizations, would be required establish a stewardship program for the collection and recycling of covered products
- The bill would establish the Textile Stewardship Recovery Fund in the State Treasury, which would make moneys available to the Department of Resources Recycling and Recovery for purposes of the program

New York State's proposed S.6654

- New York State's Senate is considering S.6654, to establish EPR for textiles
- The Bill applies to any apparel, textile or textile article that is unsuitable for reuse by a consumer in its current state or condition
- It would require producers, either individually or cooperatively with a representative organization, to submit a plan for the establishment of a collection program for covered products for approval of the DEC by 31 December 2024
 - One year after the plan is approved, covered products must be labeled with the name and contact information of the producer
- Starting 1 July 2025, producers or representative organizations must implement a collection program which is free to consumers

Trying to keep on top of **it all...**



A Smarter Way to Manage Product Compliance

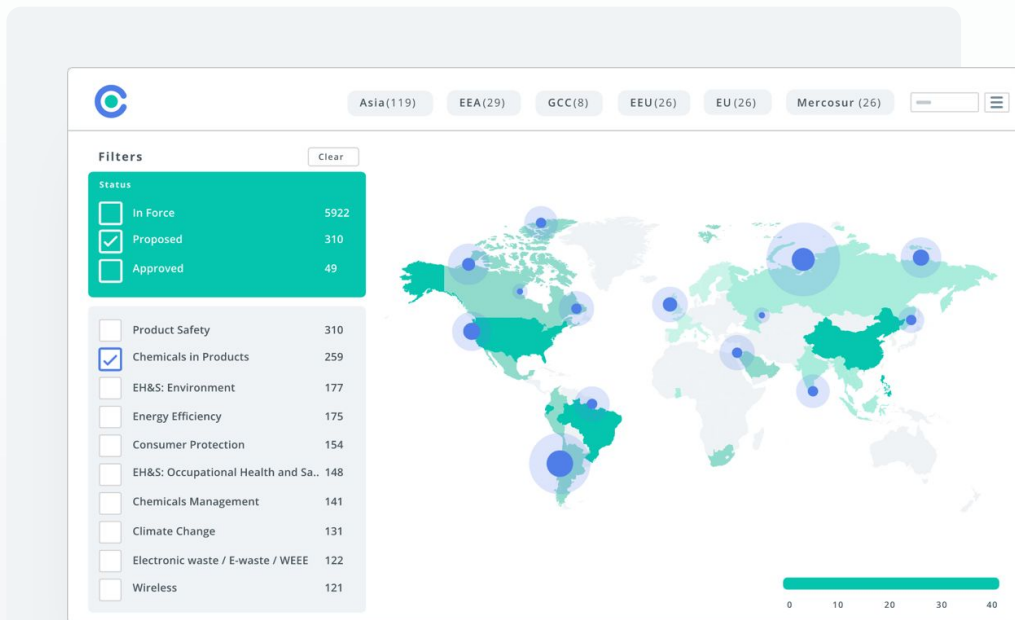
Holistic Market Access Solutions

TECHNOLOGY - C2P

C2P

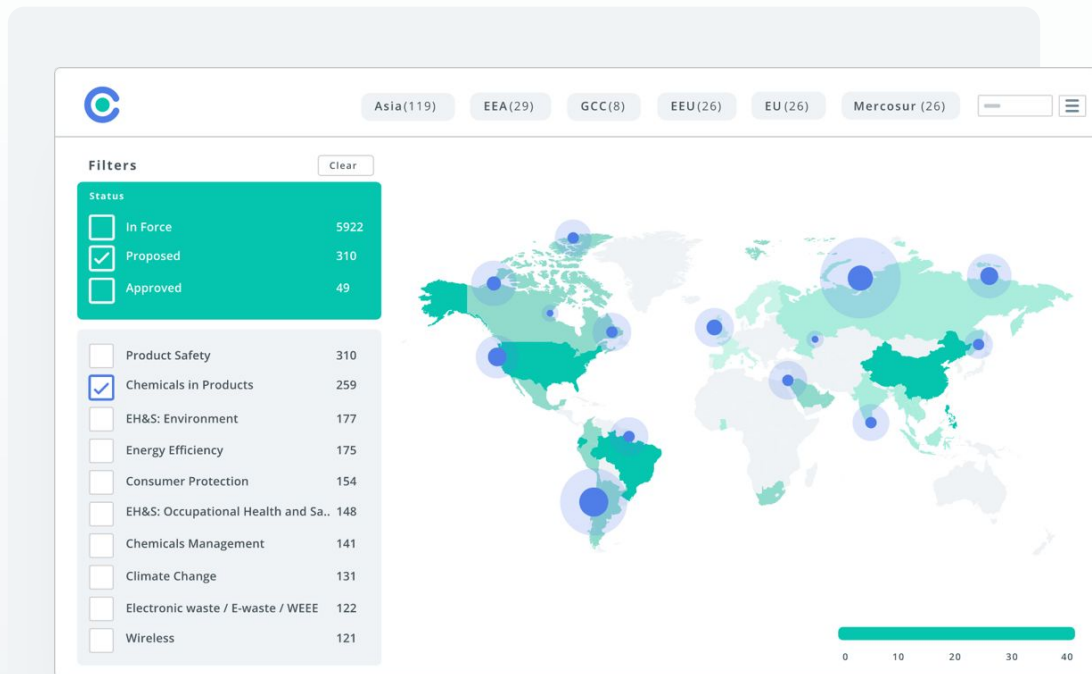
The Key to Unlocking Market Access

- Enterprise grade technology
- Cloud based platform
- Access to regulatory coverage in 195 countries
- Heatmaps with what's hot & where
- Intelligent search
- AI powered probability analysis
- Productivity tools to improve team collaboration



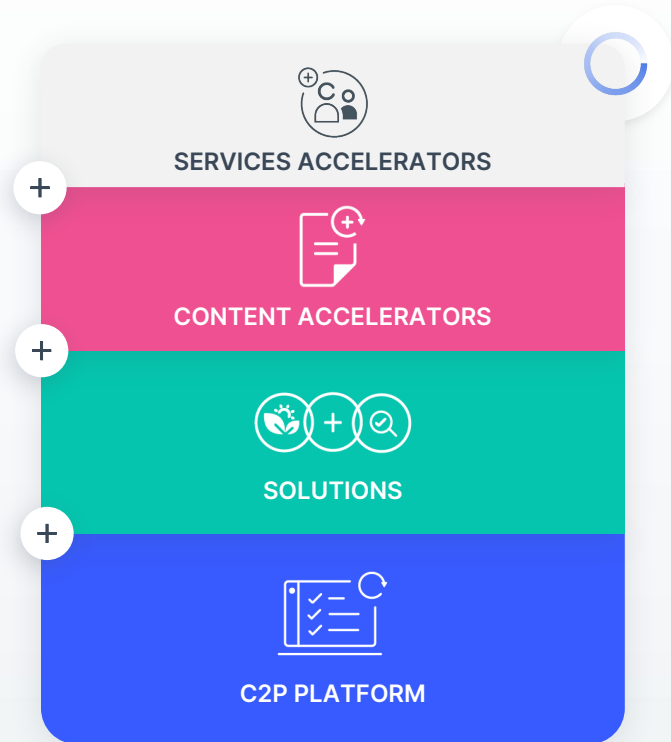
Manage everything in One Place...

- Design, build, and collaborate on new products with confidence
- Keep all [compliance evidence](#) up to date & [live linked](#) back to their Regulations, Standards & Requirements
- Continually [monitor regulatory changes](#) & [keep ahead of proposed changes](#) before they happen
- Integrate with other systems to enable [streamlined business processes](#)



Tailored to meet your needs...

- Comprehensive capabilities that enable enterprise-wide management of regulations, standards, requirements and evidence
- Add-on packages to accelerate market access through:
 - Use-case specific solutions
 - Global regulatory content
 - Professional services



Unrivalled Global Coverage for Apparel

- Compliance news & alerts, requirements types, topics, materials & substances, products covered, key dates, deadlines, exceptions & exemptions
- Commentary from regional experts in the Americas, EMEA & Asia

41+

Regulatory Areas covered

95+

Countries monitored

3,758+

Regulatory Sources

Compliance Labeling Requirements

Our regulatory experts have assessed all Regulations & Standards relevant to your Product Labeling needs.

All of your mandatory legal requirements are immediately available for each of your products within 40 seconds in C2P - to help build a compliant label.



Achieve & Demonstrate Compliance

- Create Compliant labels across markets, with considerable time and cost savings
- Compare requirements, reuse labels in multiple countries
- Daily alerts on new or updated requirements that directly impact your product's label
- Answer compliance queries/issues on product labels with unlimited access to [Subject Matter Experts](#)

The screenshot shows a web interface for managing compliance requirements. At the top, it indicates the document was created on Jun 15, 2022, and updated on Jun 15, 2022. Below this, there is a red t-shirt icon and the text 'SPEC Apparel' with a radio button for 'No attribute'. A navigation bar includes tabs for 'All', 'Australia', 'European Union (EU)', 'New Zealand', 'United Kingdom (UK)', and 'United States of America (USA)'. On the left, a sidebar lists policy areas: 'All Policy areas', 'Substances and Materials' (635), 'Labelling' (206), 'Waste and Takeback' (189), 'Safety' (40), 'Testing and Certification' (24), and 'Design' (6). The main content area shows '206 REQUIREMENTS Published' and a list of requirements. The first requirement is 'ISO 3758, Textiles - Care labelling Code Using Symbols', with sub-options for 'Labelling: Instructions', 'Textile Fibers', and 'World'. Other requirements include 'Labeling of Non-Textile Parts of Animal Origin in Textile Products', 'Organic Claims for Textile Products', and 'Lacey Act Declarations for Products Containing Plant Material'. A small inset window on the right shows various care symbols and is labeled 'GINETEX Symbols.png'.

9,000

Regulations & Standards Monitored Daily

1,400

Compliance Labeling Requirements

49

Countries

7

Product
Categories

24

Product
Attributes



A Solution
that's Cut To Fit

COMPLIANCE LABELING REQUIREMENTS

Scope of Content - Product & Packaging

Products covered in the following categories



Apparel & Textiles



Sporting Equipment



Consumer Electronics



Footwear



Personal Protective Equipment



Bikes (including e-bikes)

COMPLIANCE LABELING REQUIREMENTS

Labeling Requirements Coverage across 49 Countries



Q&A

Thank you!



Stacey Bowers
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Vish Karasani
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