



Compliance & Risks

Webinar

# Textile Compliance In 2024: From EU EPR to US PFAS Updates

21st of August, 2024



→ | [complianceandrisks.com](https://complianceandrisks.com)



Q&A  
Session

Slides &  
Webinar  
Recording



Request a  
Demo



# Webinar Platform Tips

# Meet the Team



---

**Maria Marecki**  
Market Access Manager



---

**Vish Karasani**  
Product Marketing Manager



# 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

YOOX  
NET-A-PORTER  
GROUP

RICHEMONT



PING







**99k+**  
Regulatory  
Sources

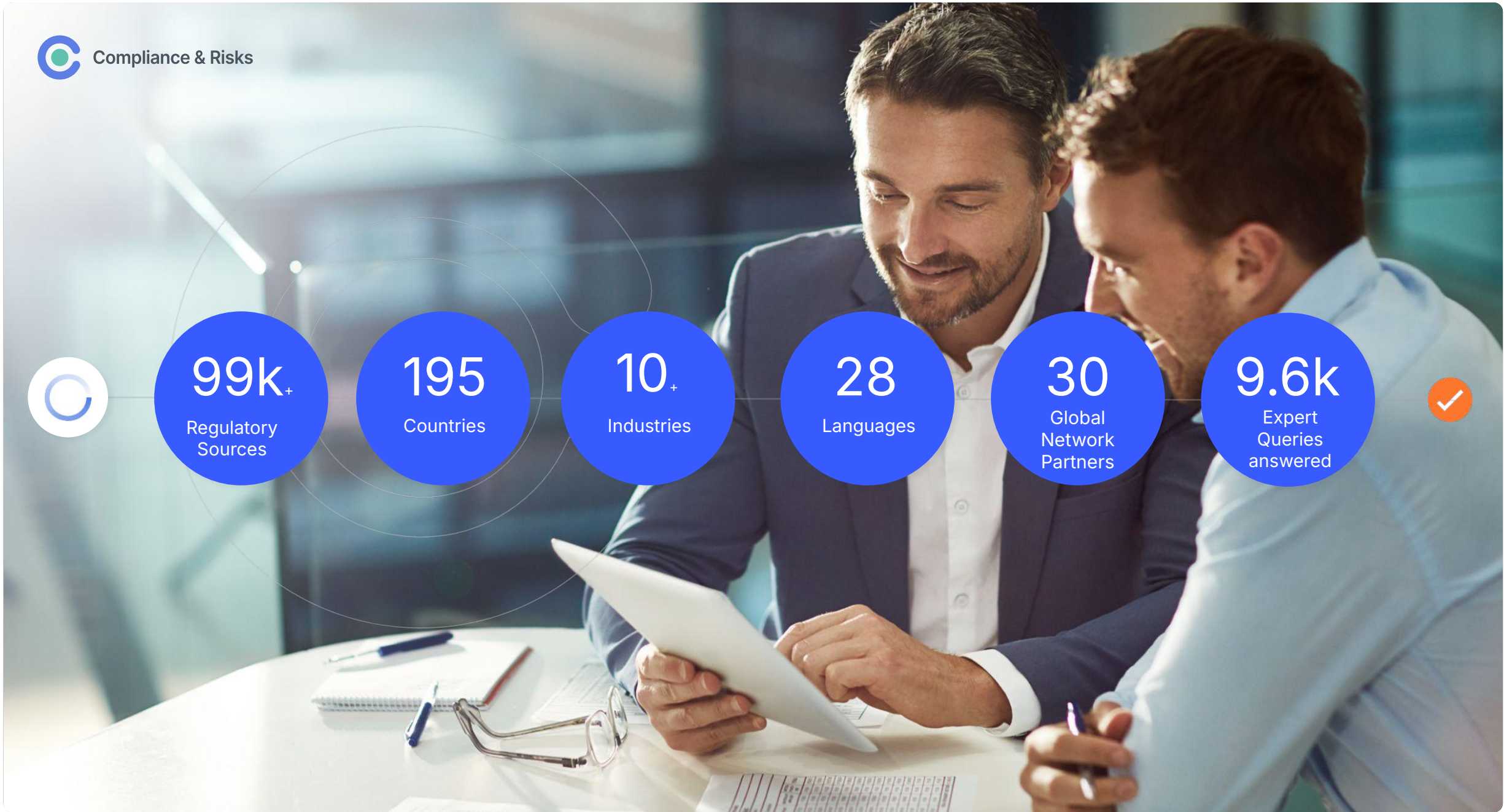
**195**  
Countries

**10+**  
Industries

**28**  
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.





# Textile Compliance In 2024: From EU EPR to US PFAS Updates



Argentina

# Labeling Amendments

In February, repeal of the requirement for manufacturers and importers of textile and footwear products to make a Sworn Statement of Product Composition (DJCP).

Labeling requirements of Resolution 622/95 on labeling of imported apparel and footwear amended:

- Exporter identification on the labels optional
- Importer name can be replaced with Unique Tax Identification Code (CUIT)

In July, Ministry of Industry and Trade eliminated customs control over the labeling of textile and footwear products entering the country.

Based on Resolutions 156/2024 and 159/2024 companies must now arrange for products to be labeled prior to marketing.

Belgium

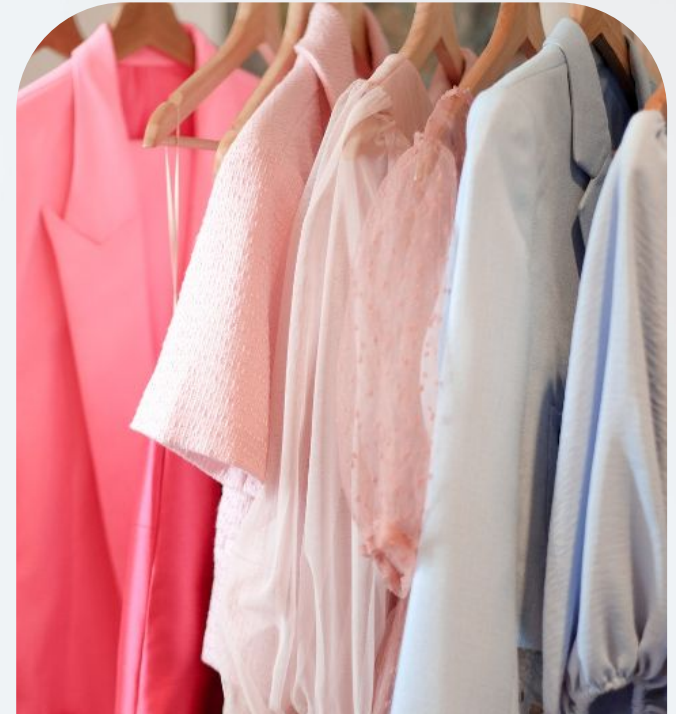
# Proposed PFAS Restriction

On 25 July 2024, the Belgian Chamber of Representatives issued the Draft Law proposing to implement the restriction on placing on the market, importing and exporting certain consumer products containing per- and polyfluoroalkyl substances (PFAS).

Applies to textiles as defined in Regulation (EU) No 1007/2011.

Protective clothing for security and civil safety professionals are excluded.

Proposed entry into force is 1 July 2025.



Canada

# Consultation on Pollution from Textiles and Apparel

Environment and Climate Change Canada (ECCC) are holding a consultation on a roadmap for addressing plastic waste and pollution from the textile and apparel sector.

Scope of the roadmap could include potential solutions for managing:

- household textile waste
- microfibre pollution
- textile waste in various subcategories within the IC&I sectors (e.g., government operations, hospitals, hotels, schools)

Overall implementation of the roadmap will be within five years of its final publication.

Comments should be submitted prior to 1 September 2024.



Canada

# PFAS Notice

In July, Canada's Department of Environment published the Notice with respect to certain per- and polyfluoroalkyl substances (PFAS).

Collect information on certain PFAS substances, either alone, in mixtures, products, or manufactured items in Canadian commerce for the calendar year 2023.

Applies to 312 substances listed in Schedule 1 of the Notice.

Manufactured item categories include:

- Clothing or footwear, including life jackets, personal flotation devices, and other safety apparel
- Bedding, sleeping bags, or towels
- Furniture, mattresses, cushions or pillows intended to be used by an individual, where the substance is contained in foam or leather or in a textile fibre, yarn or fabric

Deadline for response is 29 January 2025.

China

# Footwear Standards Published

GB 25038-2024 General safety requirements for footwear replaces GB 25038-2010, GB 21536-2008 and GB 25037-2010. Revisions include:

- Added test methods for sharp point and broken needle
- Added requirements for Cr VI, dimethyl fumarate, chlorinated phenols and short-chain chlorinated paraffin, and phthalates.

GB 30585-2024 Safety technical specifications for infants' and children's footwear replaces GB 30585-2014. Revisions include:

- Deleted requirements and test methods for odor
- Changed requirements for formaldehyde, total heavy metals, dimethyl fumarate, and phthalates
- Added requirements and test methods of short-chain chlorinated paraffins

Implementation date for both is 1 July 2025.



Denmark

# PFAS Ban Planned

Ministry of the Environment announced intention to ban PFAS clothing beginning 1 July 2026.

Order on the ban is expected by 1 July 2025.

Ban will target the sale and import of clothing, shoes and waterproofing agents to consumers.

Ban will be implemented by setting limit values that ensure PFAS cannot be deliberately used products.

PFAS in professional clothing and safety clothing will be excluded from ban.





European Union

# Waste Framework Directive Amendment Proposal

Proposes harmonized extended producer responsibility (EPR) schemes for products such as clothing and accessories, blankets, bed linen, curtains, hats, footwear, including products that contain textile-related materials such as leather, composition leather, rubber or plastic.

Require producers to pay fees in order to help fund the textile waste collection and treatment costs.

Fees will be based on the circularity and environmental performance of textile products (eco-modulation).

EPR schemes to be created within 30 months after entry into force.

Member States shall establish a register of producers.

Producers shall register in each Member State where they make products available on the market for the first time.

European Union

# Ecodesign for Sustainable Products Regulation

Published in the Official Journal of the EU on 28 June 2024 and entered into force on 18 July 2024.

From 19 July 2026, prohibit the destruction of unsold apparel, clothing accessories and footwear as listed in Annex VII.

Derogations may be made by delegated act to be adopted by 19 July 2025.

Economic operators must disclose information annually on unsold consumer products that are directly discarded by them or discarded on their behalf on their websites.

Commission shall adopt implementing acts setting out the details and format for the information by 19 July 2025.

First working plan setting out the priority products (such as textiles) must be adopted by 19 April 2025.

European Union

# Revision of the Textile Labeling Regulation

Consultation held from December 2023 to April 2024

Options include: revising and updating fiber identification, digital labeling, such as origin labeling ('made in'), EU-wide uniform size, care labeling, presence of allergenic substances, leather and fur authenticity, flammability and socially responsible production of textile and related products

Commission adoption planned for second quarter 2025





France

# Proposed PFAS Restriction

Proposed February 2024.

**1 January 2026:** Prohibition of any textile clothing product, footwear and waterproofing agents for textile clothing products and footwear intended for consumers containing PFAS.

**1 January 2030:** Prohibition of any textile product containing PFAS, with the exception of textile products necessary for essential uses.

Derogations to be specified by decree.

Prohibitions will not apply to products containing PFAS present in a concentration less than or equal to a residual value defined by decree.

France

# Textile Ecolabeling Update

Voluntary and supervised tool established by Law no. 2021-1104.

Aims to inform consumers about the environmental impact of the products they use by using a numerical value.

"Environmental cost index" displayed on products or services, on shelves or on the internet is calculated over the entire life cycle of the product or service, according to a validated reference.

Entered the final consultation phase this spring 2024.

Publication of text expected by end of 2024.

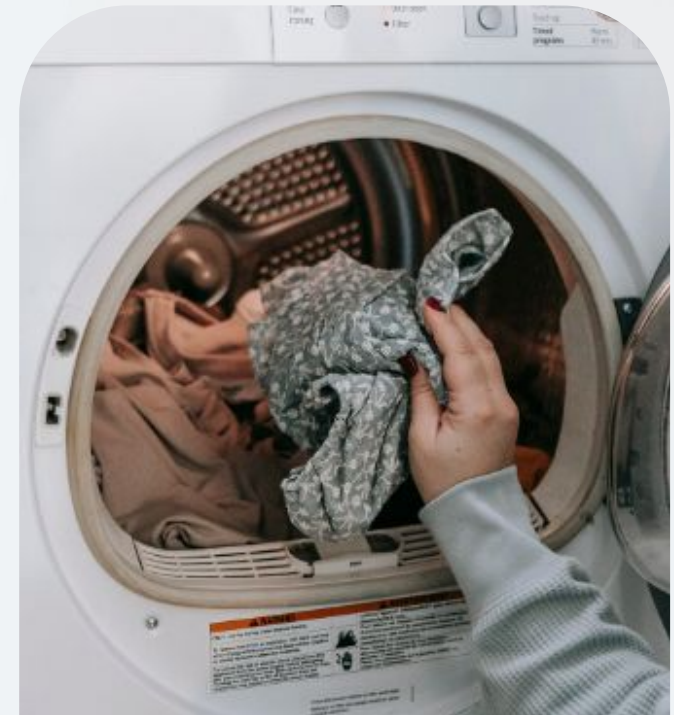
Ecobalyse too used to calculates the environmental cost of products went online in March.

Japan

# Care Labeling Proposal

Proposed revision to the Textile Goods Quality Labeling Regulation.

Will update care labeling standard to 2024 version: JIS L0001:2024 (Textiles-Care Labelling code using symbols).



South Korea

# Labeling and Testing Update

On 7 March 2024, the South Korea Agency for Technology and Standards (KATS) issued an amendment to the Notice on Safety Standards for Household Items.

Amendments made to Annex 1 include:

- simplified method for detecting Arylamine
- indication that the product is made of recycled down/feathers
- allowing the display of the date of import for imported products instead of date of manufacture

Entered in force on 7 March 2024 with one-year transition period.



United States

# PFAS Reporting

2023 EPA Final Rule requires any person that manufactures (including import) or has manufactured (imported) PFAS or PFAS-containing articles in any year from 1 January 2011 - 31 December 2022, to electronically report information regarding PFAS uses, production volumes, disposal, exposures, and hazards.

No minimum volume or concentration exemption.

Persons who have only processed, distributed in commerce, used, and/or disposed of PFAS are not required to report under this rule, unless they also have manufactured (imported) PFAS for a commercial purpose.

Reporting window is 13 November 2024 to 8 May 2025.

5-year recordkeeping period following final date of submission period.



## United States

# H.R.8978

Introduced in July, bill to establish a Voluntary Sustainable Apparel Labeling Program at the Environmental Protection Agency (EPA).

Label would contain EPA-verified information relating to the carbon footprint of the product.

The information included on the apparel sustainability label shall:

- convey a numerical summary of the best available information regarding the total greenhouse gas emissions released throughout the full life cycle article of apparel and input materials
- convey a summary of the voluntary commitment made to reduce the total greenhouse gas emissions released throughout the full life cycle of articles of apparel and input materials
- provide electronic access to the information through a quick response (QR) code

## California

# AB-347

Bill would require the Department of Toxic Substances Control to adopt regulations for the enforcement of the current PFAS restriction on or before 1 January 2029.

Department to enforce and ensure compliance with those provisions and regulations on 1 July 2030.

On or before 1 July 2029, a manufacturer of a covered product shall register with the department and provide:

- name and a description of each covered product it manufactures
- applicable registration fee
- statement of compliance certifying that each covered product is in compliance with the applicable PFAS restriction

List of accepted methods for testing whether a covered product complies with the covered PFAS restrictions and appropriate third-party accreditations for laboratories to be published by 1 January 2029.

Department may procure and test any covered product for compliance with the applicable covered PFAS restriction.

## California

# SB-707

Bill would require a producer of apparel or textile articles to join the approved producer responsibility organization (PRO) by 1 July 2026.

Any producer, regardless of whether that producer is domiciled in California, who sells, offers for sale, or distributes a covered product into the state shall be responsible for compliance.

Upon approval of a PRO plan, or 1 January 2030, whichever is sooner, a producer is subject to penalties unless the producer is a member of a PRO and all covered products are accounted for in the plan.

Online marketplace would have to notify the Department of Resources Recycling and Recovery and the PRO of all third-party sellers with sales of apparel or textile articles over \$1,000,000 in the preceding year and provide all specified required information.



Colorado

# SB24-081 enacted

Outdoor apparel for severe wet conditions containing intentionally added PFAS accompanied by disclosure "MADE WITH PFAS CHEMICALS"  
1 January 2025

Textile articles and outdoor apparel for severe wet conditions containing intentionally added PFAS prohibited  
1 January 2028

Maine

# LD 1537/ SP 610 Enacted

In April, Maine enacted LD 1537/ SP 610 to amend the state's PFAS requirements

Eliminates the general notification requirement that was previously scheduled to take effect 1 January 2025

Establishes a new reporting program for those product categories that receive a Currently Unavoidable Use (CUU) determination as of 1 January 2032

Creates new sales prohibitions for products with intentionally added PFAS



Maine

# LD 1537/ SP 610

Textile articles containing intentionally added PFAS prohibited  
1 January 2026

Outdoor apparel for severe wet conditions containing intentionally added PFAS accompanied by disclosure "Made with PFAS chemicals."  
1 January 2029

Any products containing intentionally added PFAS sold in Maine unless the use of PFAS in the product is a currently unavoidable use  
1 January 2032

## Minnesota

# Lead and Cadmium Guidance

Minnesota Pollution Control Agency (MPCA) published Guidance about Minn. Stat. §325E.3892.

Establishes 90 parts per million limit for lead and 75 parts per million for cadmium.

Covered products include, but are not limited to: clothing, footwear, headwear, and accessories, costumes, and costume accessories.

Considers the law to cover potentially accessible components in any listed product.

“Component” can mean a visible part or piece of a product such as a zipper, pendant, button, rivet, or coating and parts or pieces which are not immediately visible.

To determine if a product or any of its components meet the statute's limits complete acid digestion of a product sample is used as opposed to leaching tests.

Mirrors the initial total metals step in ASTM F96.

New Hampshire

# HB 1649 Enacted

Signed 6 August 2024.

On January 1, 2027 PFAS-added certain consumer products shall be prohibited in the state including, but not limited to: textile furnishings, textile treatments and juvenile product.

“Textile furnishings” means textile goods of a type customarily used in households and businesses, including but not limited to, draperies, floor coverings, furnishings, bedding, towels, and tablecloth but excluding textiles used in medical or industrial settings.

Products and replacement parts manufactured prior to the ban and products made with at least 85 percent recycled content and are exempt.

Rhode Island

# S 2152 / H 7356 enacted

Textile articles containing intentionally added prohibited  
1 January 2027

Outdoor apparel for severe wet conditions containing intentionally added PFAS accompanied by disclosure that includes the following statement: "Made with PFAS chemicals."  
1 January 2029

Utah

# Labeling Amendments

Effective as of 26 June 2024, slippers that contain filling material in the top portion are exempt from listing the filling material in the bottom.

Department of Agriculture and Food published draft amendments to Bedding, Upholstered Furniture, and Quilted Clothing labeling requirements in July.

Bedding upholstered furniture, and quilted clothing will be required to have either a digital law label or a digital textile label, respectively, beginning on 1 April 2025.





Utah

# Labeling Amendments

Draft updates definitions including "law label" and "textile label" to differentiate between the different industry articles

Manufacturing facility may use "recycled" for items containing down or feather if the facility:

- Global Recycled Standard (GRS) or Recycled Claim Standard (RCS) certified
- Certified under another industry accepted standard consistent with ISO 17065



## Vermont

# S .25 Enacted

Signed 30 May 2024.

1 January 2026 textile articles cannot have intentionally added 'regulated' PFAS.

"Regulated PFAS" means:

- PFAS that a manufacturer has intentionally added to a product and that have a functional or technical effect in the product, including PFAS components of intentionally added chemicals and PFAS that are intentional breakdown products of an added chemical that also have a functional or technical effect in the product; or
- the presence of PFAS in a product or product component at or above 100 parts per million, as measured in total organic fluorine.

1 July 2027: 100 ppm lowered to 50 ppm.

1 July 2028: definition of "apparel" to include "outdoor apparel for severe wet conditions".

Washington

# Apparel Regulatory Determinations

On 30 May 2024, Department of Ecology published the Regulatory Determinations Report to the Legislature: Cycle 1.5 Implementation Phase 3.

Regulatory determinations for apparel and gear:

- Reporting requirement for:
  - outdoor apparel designed for experts or professionals who are exposed to extreme weather for extended periods of time
  - shoes
  - gear
- Restriction for all other types of apparel

Draft rules to be published in September.

Rules adopted by December 2025.

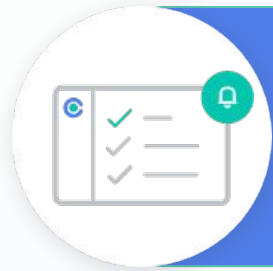


Compliance & Risks

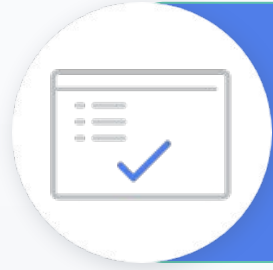
# Apparel Product Compliance Solution

A Solution That's Cut to Fit

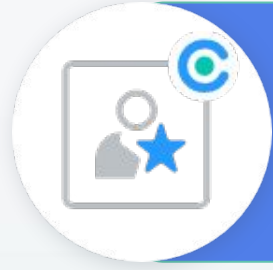




Powerful Enterprise  
Technology



Extensive Global  
Regulatory Content



Team of Subject  
Matter Experts

# Holistic Market Access Solutions...





*"Can we sell product X in market Y?"*

Achieve Market Access



*"Can we continue to sell product X in market Y when there is a change?"*

Maintain Market Access



*"What do we need to do to sell product X into a new market?"*

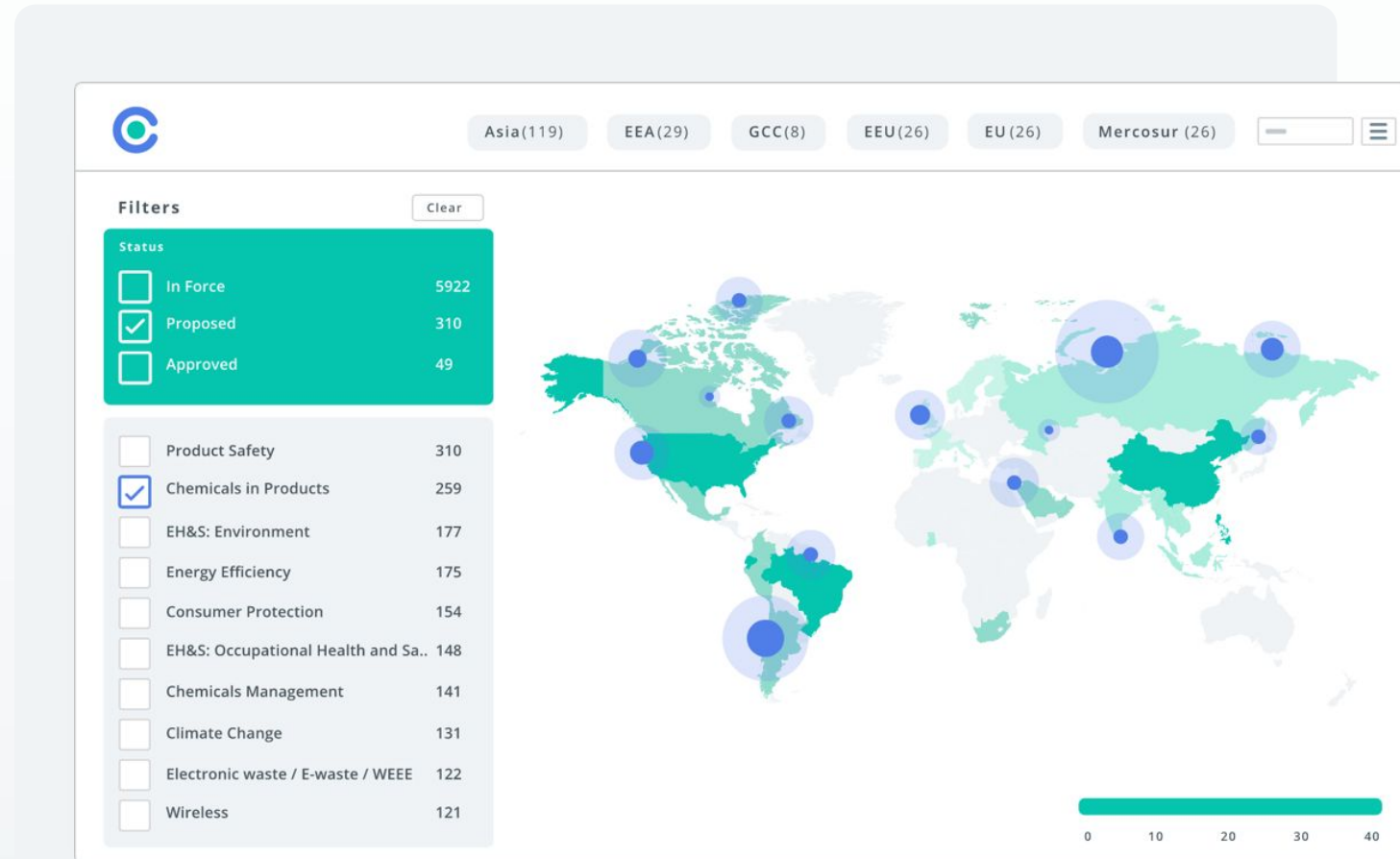
Expand Market Access

# Accelerate the ability to

Achieve, Maintain & Expand Market Access for all products in all markets

# 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



REGULATORY CONTENT

# 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

37+

Content areas available

---

95+

Countries monitored

---

5,774+

Regulatory Sources

# Regulatory Topics related to Fashion, Apparel, Luxury & Sporting Goods



**A**  
Artificial Intelligence (AI)

**B**  
Batteries  
Brexit

**C**  
California Proposition 65  
Carbon Footprint  
Chemicals and EH&S:  
Occupational Health & Safety  
Chemicals & EH&S: Environment  
Chemicals In Products  
Chemicals Management  
Circular Economy/ Waste  
Climate Change  
Conflict Minerals

**C**  
Consumer Protection  
Corporate Social Responsibility  
COVID-19

**E**  
EH&S: Environment  
EH&S: Occupational Health & Safety  
Ecodesign  
Ecolabelling  
Electromagnetic Compatibility (EMC)  
EU REACH  
ESG Reporting

**G**  
Globally Harmonized System  
(GHS)

**H**  
Human Trafficking and Slavery  
(HTS)

**I**  
Illegal Logging

**N**  
Nanotechnology

**P**  
Packaging  
Product Safety

**S**  
Single-use Plastics

**T**  
Textiles  
Transport of Dangerous Goods

**W**  
Wireless

# Compliance Labeling Requirements

9,000

Regulations & Standards Monitored Daily

1,600

Compliance Labeling Requirements

49

Countries

7

Product  
Categories

29

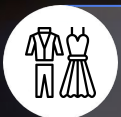
Product  
Attributes





# Labeling Requirements - Scope of Content

Products covered in the following categories



Apparel & Textiles



Footwear



Sporting Equipment



Personal Protective Equipment



Consumer Electronics

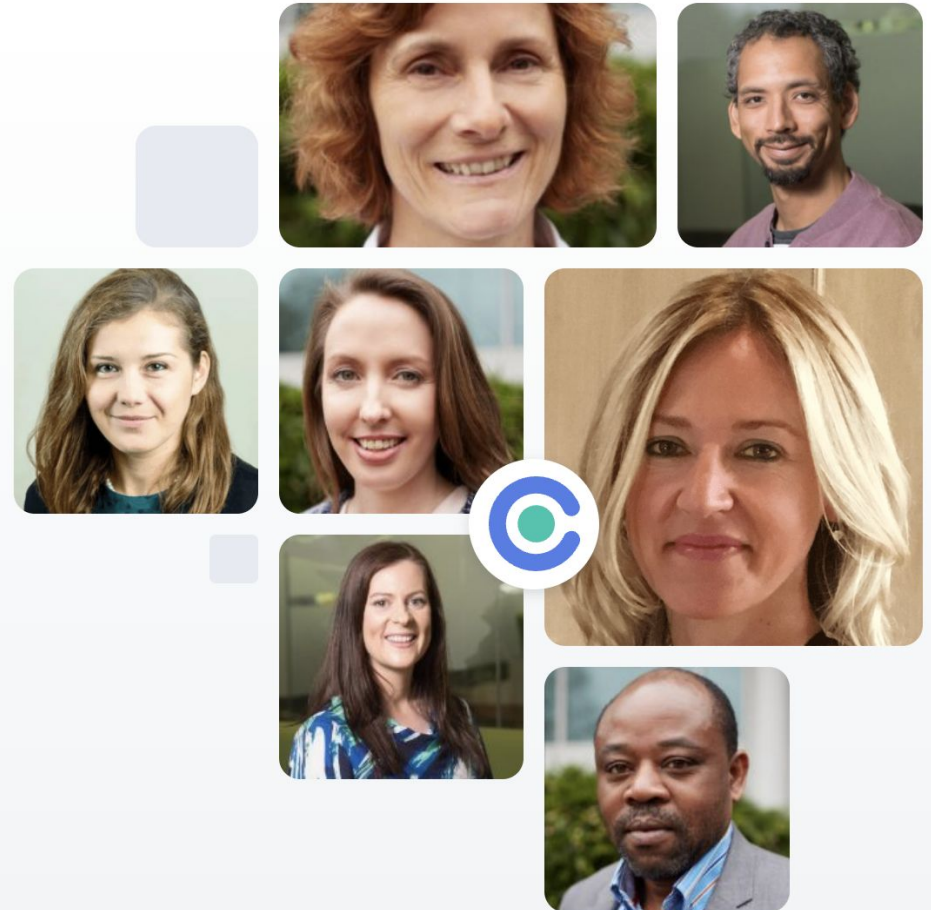


Bikes (including e-bikes)



# Ask our Experts at the click of a button...

- 40+ Subject Matter Experts
- Extensive Knowledge Partner network
- Expertise across products, geographies & policy areas
- Addressing questions on laws & regulations including purpose, applicability, requirements highlights & more.





Compliance & Risks

# Q&A

→ | [complianceandrisk.com](https://complianceandrisk.com)



# Thank You!



---

**Maria Marecki**  
Market Access Manager



---

**Vish Karasani**  
Product Marketing Manager