



SPP Programme

Report: Introduction to EU Legislation on Mandatory Green Public Procurement (GPP) Criteria for Textiles

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Summary

This report provides a comprehensive analysis of the evolving European policy landscape concerning the establishment of mandatory Green Public Procurement (GPP) criteria for textiles. Commissioned by Rijkswaterstaat under the MVI/SPP Programme of the Dutch Ministry of Infrastructure and Water Management, it aims to support Rijkswaterstaat in navigating the complex relationship between ecodesign, procurement frameworks, and sustainability objectives specific to textile products. Other policy makers in the EU institutions and Member State governments may benefit from the analysis provided in this document. The report focuses on identifying relevant legislative initiatives, mapping stakeholder influence points, and advising on policy coherence to advance sustainable procurement of textiles.

Public procurement is increasingly recognised as a strategic tool to promote circular economy objectives and reduce the environmental and social impacts of products purchased by public authorities. However, the uptake of voluntary GPP criteria for textiles has remained limited and inconsistent across Member States, leading to fragmented efforts and reduced impact. However, the adoption of the Ecodesign for Sustainable Products Regulation (ESPR) in 2024 marks a significant turning point, as it provides the legal basis for introducing mandatory minimum public procurement requirements through implementing acts. Textiles, specifically apparel, have been identified as a priority product group under the ESPR's first working plan, setting the stage for transformative policy developments in the years ahead.

The report first details the broader policy context, examining how current and future initiatives such as the ESPR, the revision of the EU Public Procurement Directives, Extended Producer Responsibility (EPR) schemes, the revision of the Textile Labelling Regulation (TLR), and the development of Product Environmental Footprint Category Rules (PEFCRs) intersect and impact the public procurement of textiles. It highlights how these frameworks increasingly align around common aspects such as durability, recyclability, chemical safety, and lifecycle environmental performance.

A central component of the report is the mapping of the ESPR-driven policy development process, particularly the ongoing Preparatory Study (PS) for textiles led by the European Commission's Joint Research Centre (JRC). The PS identifies key opportunities for stakeholders, including Member States, NGOs, industry associations, and procurers, to contribute to the design of ecodesign and GPP criteria through structured milestones and consultations. The report further identifies relevant EU stakeholders and institutional actors involved in shaping these policy instruments.

In advising on alignment opportunities, the report proposes mechanisms to integrate the ESPR's product-specific ecodesign aspects into GPP criteria, and outlines synergies with the EU Ecolabel. It also addresses technical challenges, such as verification and market surveillance, and specific needs of the workwear sector, where durability and safety requirements may demand tailored approaches. The final section highlights frontrunner initiatives across Europe that demonstrate early implementation of circular and sustainable textile procurement practices, offering replicable models and lessons for broader EU-wide adoption.

Overall, this report seeks to inform and empower decision-makers to use public procurement as a lever for driving sustainable innovation in the textile sector, ensuring that upcoming regulatory instruments are both ambitious and implementable across diverse market and policy contexts.

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List of abbreviations

Abbreviation	Full Term
ADEME	French Agency for Ecological Transition
CAM	Criteri Ambientali Minimi (Italy)
CE	Conformité Européenne (European Conformity)
CN	Combined Nomenclature
DA	Delegated Act
DG GROW	Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs
DG JRC	Directorate-General Joint Research Centre
DG-ENV	Directorate-General for Environment
DPP	Digital Product Passport
EF	Environmental Footprint
EISMEA	European Innovation Council and SMEs Executive Agency
ENVI	European Parliament's Committee on Environment, Public Health and Food Safety
EOL	Elastolefin (type of stretch fibre)
EPA	Environmental Protection Agency (Denmark)
EP	European Parliament
EPR	Extended Producer Responsibility
ESPR	Ecodesign for Sustainable Products Regulation
EU	European Union
EUEL	EU Ecolabel Criteria
EURATEX	European Apparel and Textile Confederation
EuRIC	European Recycling Industries' Confederation
FESI	Federation of the European Sporting Goods Industry
GFA	Global Fashion Agenda
GHG	Greenhouse Gas
GOTS	Global Organic Textile Standard
GPP	Green Public Procurement
IA	Impact Assessment
ICLEI	Local Governments for Sustainability
ISO	International Organization for Standardization
JRC	Joint Research Centre
LCA	Life Cycle Assessment
LCC	Life Cycle Costing

NGO	Non-Governmental Organisation
OPC	Open Public Consultation
PEF	Product Environmental Footprint
PEFCR	Product Environmental Footprint Category Rules
PLA	Polylactic Acid (bio-based polymer)
PCP	Pre-commercial Procurement
PO	Public Officer
POGI	Partnerskab for Offentlige Grønne Indkøb (Denmark)
PRO	Producer Responsibility Organisation
PS	Preparatory Study
RREUSE	Reuse and Recycling European Union Social Enterprises
SMEs	Small and Medium-sized Enterprises
TLR	Textile Labelling Regulation
TUKES	Finnish Safety and Chemicals Agency
WFD	Waste Framework Directive

1 Introduction

1.1 Purpose and target audience

This report has been prepared on behalf of Rijkswaterstaat as part of the MVI/SPP Programme supported by the Dutch Ministry of Infrastructure and Water Management. The primary audience for this report is Rijkswaterstaat's Circular Economy Department. Other bodies that may benefit from this report include policy makers and public authorities in the European Union and its Member States that are involved in the development, implementation and oversight of policies related to sustainable textiles and public procurement. The report may also be of interest to stakeholders such as procurement officers, environmental and social NGOs, industry associations, and organisations contributing to EU-level discussions on sustainable product policy.

The purpose of this report is to provide a comprehensive overview and analysis of the existing and emerging legislative and policy landscape relevant to mandatory Green Public Procurement (GPP) criteria for textile products. The European Union is placing increasing emphasis on sustainable product design and procurement practices to support the transition to a circular economy, and textiles have been identified as one of the priority sectors under several policy initiatives. Understanding how these initiatives interact and influence GPP is crucial for designing effective procurement policies and ensuring their successful implementation.

1.2 Motivation for mapping legislative and policy instruments

The need for coherent and harmonised mandatory GPP criteria for textiles has grown in response to several converging policy drivers:

- The Ecodesign for Sustainable Products Regulation (ESPR) expands the scope of ecodesign to all physical goods, including textiles, and opens the door for setting mandatory minimum GPP requirements.
- The EU's Circular Economy Action Plan and Textile Strategy prioritise reducing environmental and social impacts in textile value chains.
- Increasing pressure on public authorities to use procurement as a strategic tool to drive sustainable innovation and reduce lifecycle impacts.
- Fragmented and inconsistent uptake of voluntary GPP criteria across Member States has highlighted the limitations of non-binding frameworks.

This report lists and analyses the most relevant EU legislative and voluntary policy instruments, both existing and under development. The list of policy initiatives aims to:

- Clarify how different regulations interrelate and contribute to shaping the future of sustainable textile procurement.
- Highlight the potential synergies and alignment opportunities between policy instruments such as ESPR, the EU Ecolabel, the EU Procurement Directives or the Waste Framework Directive.
- Support policy makers in identifying strategic entry points for developing mandatory GPP criteria and aligning procurement with broader sustainability goals.
- Offer guidance for public authorities and stakeholders to effectively engage in the policy development process, including through upcoming consultations and preparatory studies.

1.3 How to Read This Report

This report is structured according to five main analytical tasks:

- **Task 1** provides a detailed overview of the EU policy context, including both mandatory instruments, e.g. ESPR, EPR, TLR, and voluntary schemes, e.g. EU GPP criteria, EU Ecolabel, PEFCRs.
- **Task 2** identifies the process and timeline for defining mandatory GPP criteria for textiles, including opportunities for stakeholders to influence the process.

- **Task 3** maps the most relevant EU policy makers and stakeholders, including key Directorate-Generals and industry organisations involved in the legislative processes.
- **Task 4** offers advice on how GPP criteria can be aligned with ESPR's circular product aspects and other emerging policy instruments and discusses the differences between mandatory and voluntary GPP mechanisms.
- **Task 5** identifies frontrunner initiatives and examples of good practice in textile GPP across Member States and beyond.

2 Task 1: Detailed overview of the policy context

This section provides a detailed overview of the EU policy processes and initiatives affecting public procurers, starting with mandatory policy instruments such as the EU Public Procurement Directive, or the Ecodesign for Sustainable Product Regulation (ESPR), and moving on to voluntary schemes affecting textile products, such as the EU ecolabel or the PEF Category Rules (PEFCR).

2.1 Mandatory policy instruments under development / review

2.1.1 EU Public Procurement Directive

To ensure fair competition among businesses throughout Europe, the EU has established Public Procurement Directives that sets out minimum harmonised public procurement rules. These directives apply to how public bodies and certain utility providers acquire goods, services, and construction work, including those related to textiles. Once these directives are adopted into national legislation, they become binding for procurement activities that exceed specific financial thresholds. For contracts below those thresholds, national regulations take precedence, though these must still align with the overarching principles of EU law.

The European Commission has initiated a comprehensive evaluation of the existing Public Procurement Directives framework, which includes Directives 2014/23/EU, 2014/24/EU, and 2014/25/EU¹. This evaluation aims to assess whether the current rules effectively promote fair competition, transparency, and strategic objectives such as sustainability and innovation. The review process involves public consultations and stakeholder feedback, with the goal of identifying areas for improvement and potential revisions to the directives. The European Commission launched a formal public consultation in Q4/2024 with an impact assessment expected to be carried out in 2025, while it aims to propose legislative changes by Q3 2025. Internal communication with the Commission revealed that these legislative changes will likely entail streamline provisions, although no comments were made at this point about the scope and level of ambition of the provisions (the latter will depend on the specific delegated acts).

The proposal for the revised directives will build upon: i) the special report from the European Court of Auditors on public procurement in the EU, published in 2023², and ii) the Council Conclusions (C/2024/3521)³. These two documents point to the need for further action to address the problem of a decreased competition in public procurement and make full use of the potential of the EU's public procurement market.

Furthermore, the Clean Industrial Deal⁴ outlines a roadmap for competitiveness and decarbonisation of European industry and calls for a revision of the Public Procurement Directives (2014/23, 24, 25) to reinforce non-price criteria such as sustainability, but also supply resilience and European preference. Likewise, the opinion⁵ by the European Economic and Social Committee on the role of public procurement in achieving various EU policy goals and call for a revision of the public procurement directives.

Based on the abovementioned sources, we anticipate the following changes to the Public Procurement Directives:

1. **Integration of non-price criteria:** the revised directives are expected to place greater emphasis on non-price criteria, such as sustainability, resilience, and European added value, in public procurement decisions. This shift aims to move beyond the traditional focus on the lowest price to consider broader socio-economic and environmental impacts.
2. **Promotion of strategic autonomy:** the Commission plans to introduce a "Buy European" policy, allowing EU governments to favour domestic over foreign bidders in public procurement for critical sectors and technologies. This measure seeks to protect European industries from cheaper foreign competitors and reduce dependence on imports.
3. **Simplification and flexibility:** in line with the Commission's Omnibus I and II packages, efforts are underway to simplify procurement procedures and reduce administrative burdens, particularly

for small and medium-sized enterprises (SMEs). This includes proposals to streamline rules and introduce more flexible tender processes.

4. **Enhancement of joint procurement mechanisms:** the revised directives will aim to strengthen joint procurement mechanisms, enabling multiple EU actors to engage in collective purchasing. This approach is intended to build strategic stockpiles of critical raw materials and enhance supply chain resilience.
5. **Incorporation of social and environmental standards:** to be fully coherent with other EU policy like the Ecodesign for Sustainable Product Regulation (ESPR), the Commission is considering making the inclusion of social and environmental criteria mandatory in public procurement processes. This move would ensure that public contracts contribute to the EU's sustainability and social objectives.
6. **Introduction of digital passports and labels:** closely related to point 5 above, to facilitate the assessment of environmental performance, the Commission plans to implement sustainability passports and labelling systems for products and companies. These tools would help contracting authorities evaluate the sustainability credentials of bidders.
7. **Support for innovation and SMEs:** the revised directives are expected to encourage innovation procurement and improve access for SMEs and social enterprises. This includes measures such as breaking down large contracts into smaller lots and reserving contracts for specific groups to enhance participation.

2.1.2 Ecodesign for Sustainable Product Regulation (ESPR)

2.1.2.1 General description

Regulation (EU) 2024/1781⁶ (hereinafter called ESPR) establishes a framework for the setting of ecodesign requirements for sustainable products. This regulation repeals Directive 2009/125/EC (hereinafter called Ecodesign Directive), expanding the scope of EU ecodesign legislation to all physical goods placed on the EU market, not just energy-related products.

A transitional period between the two regulations spans from 18 July 2024 to 31 December 2030, during which the following applies:

- Continued Validity of Existing Measures: Implementing measures adopted under the Ecodesign Directive remain in effect until they are either repealed or replaced by new delegated acts under the ESPR.
- transition period until 31 December 2026 under which the ecodesign measures under preparation for some product groups continue to be covered by the Ecodesign Directive
- transition period until 31 December 2030 for amendments to address technical issues regarding those implementing measures can continue to be covered by the Ecodesign Directive.

The Commission is empowered to adopt delegated acts to supplement this Regulation by setting ecodesign requirements at product specific level. The ESPR allows for the introduction of mandatory minimum requirements for public procurement through specific implementing acts, provided that the products covered by ESPR delegated acts are relevant to public purchasers and that acquiring the most environmentally sustainable options is economically feasible for them (Article 65(2)). This provision places significant emphasis on the principle of economic feasibility, which may contribute to a more conservative approach in setting minimum requirements. In particular, for product categories where environmentally sustainable solutions entail higher upfront costs, such as those involving advanced materials or circular-ready designs, there may be reluctance to adopt stringent criteria. This hesitance could be further reinforced where lower-cost, less sustainable alternatives remain dominant in the market. Nevertheless, it is important to recognise that the consideration of cost impacts is not a novel practice. The Commission routinely evaluates such aspects through the Impact Assessment process when introducing new

regulatory requirements. What is notable in this case is that the emphasis on economic feasibility is explicitly embedded in the legal text, thereby formalising a practice already integral to policy development.

However, the perceived cost barriers can often be addressed when considering a broader lifecycle perspective. Higher initial expenses may be offset by longer product lifespans, increased potential for reuse, availability of repair services, improved maintenance options such as laundry services, or more thoughtful product design, such as the avoidance of unnecessary branding elements. Additionally, cost savings may be realised in other parts of the value chain.

Therefore, the focus should not rest solely on the upfront investment, but rather on the overall societal and economic costs and benefits across the product's lifecycle. While governments are in a position to facilitate and coordinate such systemic solutions, companies operating in consumer-driven markets (like those targeted by the ESPR) often rely on different business models and pricing strategies, which may limit their ability to internalise these broader cost considerations independently.

On the issue of minimum requirements, the ESPR states that they shall be based on the two highest performance classes, the highest scores or, when not available, on the best possible performance levels as set out in the delegated act adopted pursuant to Article 4 applicable to the product groups in question. In this context, the minimum requirements should be based on performance thresholds, although it is still unclear whether this can limit the use of other types of requirements, e.g. information requirements.

In the preparatory work, the focus appears to be placed initially on Ecodesign requirements, with Green Public Procurement (GPP) considerations only explored subsequently and only where deemed necessary. However, the Commission should consider the integration of GPP considerations from the outset of the process since GPP addresses a distinct target group, namely public authorities, and operates within a different market segment, often characterised by Business to Business (B2B) dynamics. As such, it warrants a parallel and coordinated approach rather than being treated as a secondary or optional element.

It is also important to clarify that the reference to the “two highest performance classes” is not directly applicable in this context. This criterion is more relevant to product groups such as energy products (servers, screens, computers, lighting, etc.) which are subject to established energy labelling schemes with multiple performance classes. In the case of textiles, such structured classification systems typically do not exist, making alternative performance benchmarks more appropriate.

The Commission has recently adopted the ESPR Working Plan 2025–2030⁷, which sets out a list of product groups which are to be prioritised for the setting of ecodesign requirements and the estimated timelines for their setting (see section 2.1.2.2). According to the Working Plan, the priority products for ecodesign and energy labelling requirements include textiles, together with steel, aluminium, furniture, tyres and mattresses. These product groups were selected based on their potential to deliver on the circular economy. Scientific evidence supporting the prioritisation process are provided by the JRC study on new product priorities⁸.

2.1.2.2 Progress and process of the JRC Preparatory Study

According to the Ecodesign for Sustainable Products and Energy Labelling Working Plan 2025–2030, the expected timeline for the textiles delegated act adoption (specifically apparel) under the ESPR is year 2027. A draft Preparatory Study⁹(PS) is being carried out by the Joint Research Centre of the European Commission and focusing on ‘Textile apparel’ (see timeline in Figure 1), defined as *textile products that aim to cover the body with everything except footwear*. The JRC Preparatory Study clarifies that “apparel” also means *a textile product worn as clothing or a clothing accessory by a person to clothe and/or adorn, and/or shield from, and/or feel comfortable with the outer environment and/or to express their personal and professional identity and/or belonging to a specific social group, with symbolic meanings and aesthetic values*.

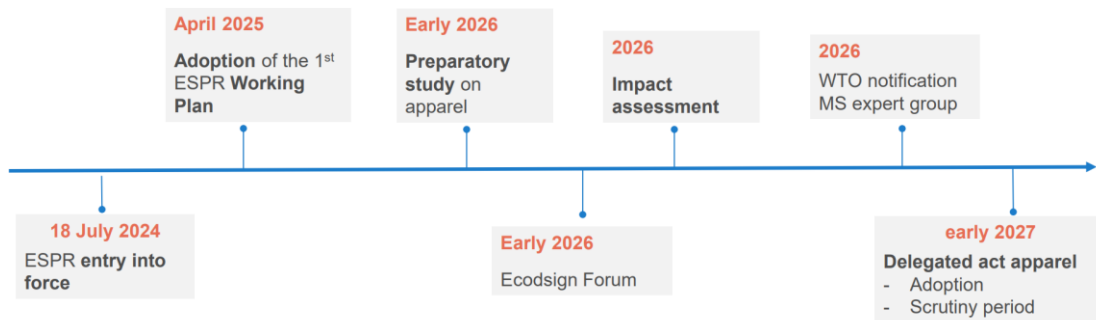


Figure 1: Updated timeline according to the most recent presentation from the European Commission. Source: Textile ETP Annual Conference 2025 (Alcoy, 13 May) - Preparatory study on textiles for product policy instruments¹

“Footwear” is not prioritised under the Ecodesign for Sustainable Products and Energy Labelling Working Plan 2025–2030 but will be reassessed in the mid-term review after further evaluation of the potential to improve environmental sustainability of footwear by the end of 2027.

According to Figure 2, the Commission will work in parallel to the Preparatory Study on the preparation of an Implementing Act related to mandatory EU GPP criteria for apparel as well as the drafting of EU Ecolabel Criteria (EUEL) based on the analysis of aspects specific to the EU Ecolabel such as the social aspects and the restriction on specific chemical substances of concern.

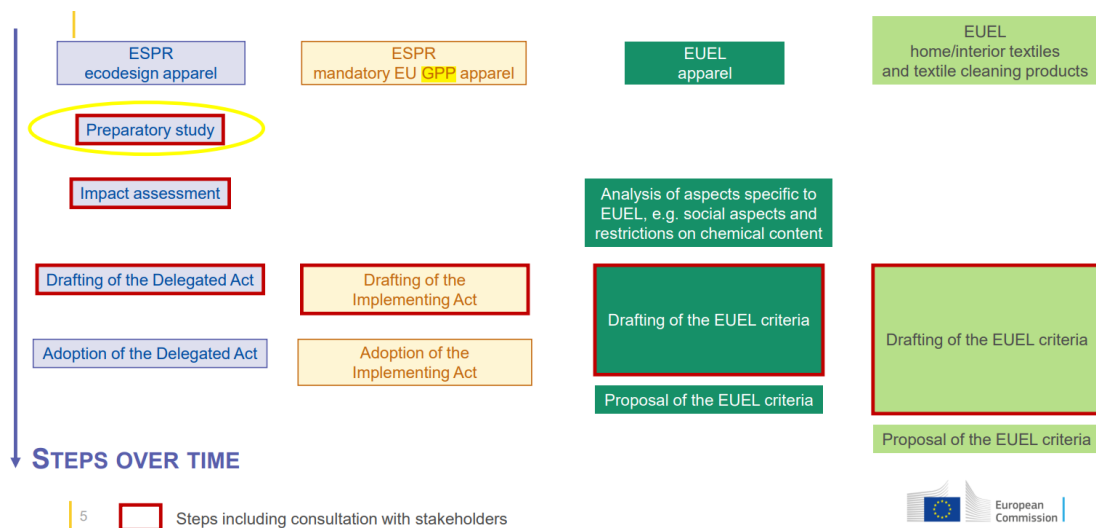


Figure 2: ESPR work stream on textile product group: steps over time. Source: most recent updates from JRC (May 2025)

The JRC Preparatory Study reports that while many European countries have voluntary GPP schemes on textile products, it is not possible to assess the uptake of the EU GPP criteria. This is mainly due to their voluntary nature and the lack of a framework to collect this kind of data. Establishing a structured data collection system for Green Public Procurement (GPP) criteria at the Member State level would provide essential insights into the actual uptake and effectiveness of these voluntary schemes. A well-designed

¹ See the JRC slides of the Textile ETP Annual Conference 2025. Available at: <https://susproc.jrc.ec.europa.eu/product-bureau/product-groups/467/documents>

system would include standardised reporting formats, digital tracking tools integrated with procurement platforms, and coordination mechanisms between national and local authorities. Such infrastructure would enable the European Commission and Member States to base future mandatory GPP criteria on solid empirical evidence, ensuring technical relevance, market readiness, and greater environmental impact.

Considering possible future mandatory EU GPP criteria, respondents to the JRC questionnaire provided the following suggestions:

- Provide a clear and fixed set of requirements, which will allow manufacturers to produce goods that meet the demand.
- Assess administrative obstacles related to the premature disposal of textile products caused by contracting or budget period reasons.
- Facilitate the verification of product characteristics to procurers, who are usually not sustainability experts.
- Establish a framework based on Life Cycle Costing (LCC) of durable textile products.
- Establish a framework which considers environmental and social aspects in the whole value chain, possibly promoting the purchase of second-hand products.
- Support public authorities to develop a common strategy in purchasing and disposing of textile products.

2.1.2.3 Types of criteria

This adoption of a delegated act on apparel will kick off specific sustainability and information requirements related to the aspects described in Figure 3, likely implemented through tools like the Digital Product Passport, aiding in traceability and better consumer awareness.

The JRC Preparatory Study is currently (as of June 2025) designing policy options, i.e. assessing which requirements can be addressed by the delegated act and analysing which of these requirements can be relevant to public procurement. Note that GPP Criteria can be established only once the policy options are established, although the scope may be different for GPP criteria and ecodesign. The Commission has anticipated that, at this stage, dedicated baseline scenarios on professional textile (work wear) are not being developed, meaning that a differentiation between professional textiles and regular textiles will not be in scope for any policy intervention regarding ecodesign requirements, Ecolabel or GPP criteria. The policy intervention on such requirements will target textile products in general.



Figure 3: Key product aspects under ESPR – Article 5. Source: most recent updates from JRC (May 2025)

Preliminary analysis of the relevance of different aspects has been carried out by the JRC PS in chapter 10.9.1 “Qualitative assessment based on technical, socioeconomic and environmental dimensions”. The analysis covers the groups of aspects presented in Figure 3.

Physical durability is taken as the leading aspect of a group of assessed aspects (including reusability and reliability) because it focusses on intrinsic measurable properties of the product which are reported in Annex I to ESPR and allows to indirectly address reliability and reusability. Conversely, as mentioned in the JRC PS, emotional durability refers to the emotional attachment that the user has to the product and it does not fall into the definition of “durability” reported in the ESPR. Although emotional durability is not a product aspect, its relevance to the life-cycle environmental impacts of the textile apparel was largely considered in several sections of the PS (e.g. section 6.4.3 Person-product attachment).

Although the product aspect of maintenance is strictly connected to the physical durability, it was addressed separately because it is mostly related to information to be provided to the user, rather than connected to the physical performance of the product.

The third group of product aspects is led by repairability which has a definition and characteristics that closely relates to upgradability, possibility of refurbishment, and possibility of remanufacturing. When addressing repairability with product modularity, use of standard components, and the other relevant parameters, the product aspects of upgradability, refurbishment and remanufacturing is indirectly addressed.

The expected generation of waste is considered as a product aspect to be addressed individually, providing the feedstock for the recycling system.

The fifth group gathers recyclability and recycled content, because recycled material should come from recyclable textile products. From this perspective, these product aspects share the same ecosystem and are affected by the same process techniques, business models, legislation, and industrial practices. More details about recyclability and recycled content are provided in the analysis of technologies in section 9.2.5 of the PS.

The product aspect addressing environmental impacts includes the assessment of use (and efficiency) of water, energy and resources, which are the fundamental elements affecting the environment (see section 3.3 of the JRC PS). The following steps of the PS will develop the environmental and economic model that will consider all resources used in the entire life cycle of the textile apparel. In particular, the part of the model related to raw material production will gather available data coming from the most used practices. This approach will support the identification of resource use that less negatively impact the environment in this specific stage. Additionally, Task 5 of the JRC PS will report a specific analysis on microplastics release in the whole life cycle of textile products.

Although the presence of substances of concern strongly affects other product aspects, it is suggested to be addressed separately because it mainly refers to information requirements to be reported by the economic operator placing/making available the product on the market. Substances are used to give specific characteristics to the product, facilitate the manufacturing stage, or affects the treatment of the product when it becomes waste. Consequently, substances of concern could directly affect the physical durability, the recyclability, the recycled content and the environmental impacts.

Table 42 of the JRC PS “Interaction between product aspects and product parameters reported in Annex I to ESPS” provides a strategic mapping tool for identifying where interventions (via product parameters) can most effectively drive improvements in sustainability. It underlines that no single parameter addresses all aspects, reinforcing the need for a holistic and multi-parameter approach in the ESPR framework. This multi-parameter approach may be useful to identify synergies and trade-offs among sustainability goals.

2.1.3 Extended producer responsibility (EPR) for textiles

The Waste Framework Directive (WFD) is the EU's legal framework for waste management in the EU. It sets the definitions related to waste management, including definitions of waste, recycling and recovery, the waste hierarchy and basic concepts.

The last amendment to the WFD (Directive (EU) 2018/851) introduces stronger provisions for EPR schemes. While Directive (EU) 2018/851 does not yet mandate a harmonised EU-wide EPR scheme for textiles, it creates the framework that allows and encourages Member States to establish EPR schemes for textiles and other waste streams. Article 11 requires Member States to ensure separate collection of textile waste by 1 January 2025. This provision is a significant step toward supporting the implementation of EPR for textiles.

France, the Netherlands and Hungary were pioneers in establishing systems where economic operators placing textile products on the market contribute to the collection, sorting, reuse, preparing for reuse and recycling infrastructure for the same products. Other Member States establishing EPR schemes are Greece and Spain, while Italy is not far behind.

In 2023, the Commission proposed a targeted amendment¹⁰ of the Waste Framework Directive, with a focus on textile waste. The proposal aims to bring about a more circular and sustainable management of textile waste, in line with the vision of the EU Strategy for Sustainable and Circular Textiles¹¹. In particular, the Commission is proposing to introduce mandatory and harmonised Extended Producer Responsibility (EPR) schemes for textiles in all EU Member States. EPR schemes have been successful in improving the management of waste from several products, such as packaging, batteries and electric and electronic equipment. Producers will cover the costs of management of textile waste, which will also give them incentives to reduce waste and increase the circularity of textile products, i.e. designing better products from the start. How much producers will pay to the EPR scheme will be adjusted based on the environmental performance of textiles, a principle known as 'eco-modulation'.

A provisional agreement was reached on the 18 February 2025 between the European Parliament and the Council on the targeted revision of the Waste Framework Directive. The European Parliament's Committee on Environment, Public Health and Food Safety (ENVI) approved the provisional agreement on 18 March 2025. The final plenary vote in the European Parliament was originally scheduled for 7 July 2025, but it has been recently postponed until October 2025. Following this, the Council is expected to formally endorse the agreement. Member States will then have up to 20 months to transpose the directive into national legislation.

The proposed EPR scheme targets household textiles, apparel, clothing accessories, and footwear. It applies to producers who place these products on the EU market for the first time, including through online platforms. Microenterprises (under 10 employees) and self-employed tailors producing custom items are exempt. Producers will be financially responsible for the full lifecycle management of the products they place on the market, including: separate collection, transport and sorting of used and waste textiles, preparing for re-use, recycling, and, where necessary, other forms of recovery or disposal. Producers will also be made responsible for information campaigns to consumers on sustainable textile consumption, as well as funding research and innovation in textile sorting and recycling, particularly fibre-to-fibre recycling.

The proposal seeks harmonised implementation across Member States to avoid market fragmentation and administrative burdens. The proposed measures include: a common definition of products and waste categories, the use of Combined Nomenclature (CN) codes to define which products are covered and a mandate for Member States to establish a national producer register and producer responsibility organisations (PROs).

One of the key novelties introduced by the proposal is the adoption of eco-modulation of fees. Under this framework, producers will need to pay fees depending on the environmental performance of the textile products. Products that are more durable, repairable, recyclable, or include recycled content will pay lower

fees. The modulation must align with ecodesign requirements under the Ecodesign for Sustainable Products Regulation (ESPR).

2.1.4 Textile Labelling Regulation (TLR)

The EU has aligned laws in all EU countries with Regulation (EU) No 1007/2011¹² on fibre names and related labelling and marking of the fibre composition of textile products, commonly referred to as the Textile Labelling Regulation. The Regulation was adopted to ensure that citizens, businesses, and public authorities can readily identify their rights and obligations. The main elements are:

- General obligation to state the full fibre composition of textile products.
- Minimum technical requirements for applications for a new fibre name.
- The requirement to indicate the presence of non-textile parts of animal origin.
- Exemption applicable to customised products made by self-employed tailors.
- Empowerment of the European Commission to adopt delegated acts amending the technical Annexes of the Regulation.
- Reporting on the implementation, review clause, and study on hazardous substances to be undertaken by the Commission.

The Commission is undertaking a comprehensive revision of the Textile Labelling Regulation (EU) No 1007/2011, aiming to modernise labelling practices in alignment with sustainability goals and technological advancements. This initiative is part of the broader EU Strategy for Sustainable and Circular Textiles, which seeks to enhance transparency, reduce environmental impact, and streamline compliance across Member States. The key objectives of this revision include harmonisation of labelling requirements, integration of digital labelling, enhanced consumer information, support for sustainability and circular economy and consideration for SMEs.

As regards sustainability and circular economy, the revision aims to align labelling requirements with the EU's sustainability goals by incorporating information on recycled content, organic or bio-based materials, and socially responsible production practices, thereby promoting environmentally friendly consumer choices.

As for the timeline of the revision, on 12 July 2023, the European Economic and Social Committee adopted an exploratory opinion on the revision of the Textile Labelling Regulation. A call for evidence followed on 3 August 2023, with the public consultation being conducted from 19 December 2023 to 15 April 2024, gathering input from stakeholders on the functioning of the current regulation and potential improvements. On 18 October 2024, DG GROW hosted a validation workshop with stakeholders, reactions are now being carefully considered in the ongoing back-to-back evaluation and impact assessment, whose reactions underpin the initially planned proposed revision by the fourth quarter of 2025. However, the revision has not been included among the planned deliveries for 2025, indicating a possible delay in the legislative process². Undisclosed Commission sources have stated that DG GROW is working on the supporting study for the impact assessment, which is quite advanced. Adoption will likely take place in 2026.

2.1.5 Ban on destruction of unsold goods

The ESPR provides a scope for the Commission to update the list of products for which a ban on the destruction of unsold products applies, and to include the products considered for a ban in ESPR working plans. Table 1 shows the consumer products for which the destruction by economic operators is prohibited according to ESPR. For this first ESPR working plan, the Commission does not intend to use the Regulation's provision regarding ban on destruction of unsold goods. It is premature because the insights

² See the European Parliament's legislative train schedule. Revision of the textile labelling regulation – In "A new plan for Europe's sustainable prosperity and competitiveness". Available at: <https://www.europarl.europa.eu/legislative-train/theme-a-european-green-deal/file-textile-labeling-regulation>

gained from implementing the mandatory disclosure of information on the destruction of unsold consumer products (that will provide the basis for any bans in future working plans) are not yet available. Nevertheless, according to Article 25, the destruction of unsold consumer products as currently listed in Annex VII, i.e. apparel and clothing accessories and footwear, shall be prohibited from 19 July 2026.

The proposed derogations on unsold goods destruction are available since June 30 and feedback can be provided until 11 August.¹³

Table 1: Consumer products for which the destruction by economic operators is prohibited according to ESPR.

Commodity code	Description
Apparel and clothing accessories	
4203	Articles of apparel and clothing accessories, of leather or composition leather
61	Articles of apparel and clothing accessories, knitted or crocheted
62	Articles of apparel and clothing accessories, not knitted or crocheted
6504	Hats and other headgear, plaited or made by assembling strips of any material, whether or not lined or trimmed
6505	Hats and other headgear, knitted or crocheted, or made up from lace, felt or other textile fabric, in the piece (but not in strips), whether or not lined or trimmed; hairnets of any material, whether or not lined or trimmed
Footwear	
6401	Waterproof footwear with outer soles and uppers of rubber or of plastics, the uppers of which are neither fixed to the sole nor assembled by stitching, riveting, nailing, screwing, plugging or similar processes
6402	Other footwear with outer soles and uppers of rubber or plastics
6403	Footwear with outer soles of rubber, plastics, leather or composition leather and uppers of leather
6404	Footwear with outer soles of rubber, plastics, leather or composition leather and uppers of textile materials
6405	Other footwear

2.2 Voluntary schemes

2.2.1 EU Green Public Procurement (GPP) for textiles

The most recent EU Green Public Procurement (GPP) criteria for textiles were published in 2017¹⁴. These voluntary guidelines assist public authorities in procuring textile products and services with reduced environmental and social impacts throughout their life cycle. Specifically, the Green Public Procurement criteria for textiles are voluntary guidelines that help public authorities purchase textile products and services with lower environmental and social impacts. They take a life-cycle approach, considering everything from raw material sourcing to use and end-of-life. The criteria encourage the selection of textiles made from sustainable sources, such as organically grown or recycled fibres, and favour materials produced with lower inputs of water, pesticides, and fertilisers. To reduce harm during manufacturing, the use of hazardous chemicals is strictly limited, with compliance expected under EU chemical regulations

like REACH. Textiles must also meet high performance standards to ensure durability, with requirements for colour fastness, shrink resistance, and overall strength, so that products last longer and need to be replaced less frequently. Transparency is key, and suppliers must provide documentation to verify compliance with the various environmental and social criteria. While ecolabels such as the EU Ecolabel can help demonstrate compliance, they are not strictly required. Instead, the GPP criteria offer flexible tools so that authorities can adopt them according to their ambitions and market context.

Regarding circular economy goals, the GPP framework already promotes to some extent reuse, reparability, and recyclability. However, for instance, textiles-to-textiles recycling (using recycled fibres) is not considered in the current version of the criteria. Given that the criteria are 8 years old (or older as they were originally drafted before then) an update of these criteria is considered as necessary.

In the context of the ESPR Preparatory Study, the initial questionnaire allowed the collection of respondents' opinions on the status of the current voluntary EU GPP criteria and on the lessons learnt so far. The questionnaire showed that although many European countries have GPP schemes on textile products, it is not possible to understand the level of uptake of the EU GPP criteria. This is mainly due to their voluntary nature, and the lack of a framework to collect this kind of data.

Since the adoption of the ESPR, the EU Green Public Procurement (GPP) criteria are expected to become more prominent, and in certain contexts, mandatory. More details on the implementation of GPP criteria via the ESPR can be found in section 3 (Task 2).

2.2.2 Product Environmental Footprint Category Rules (PEFCR)

The Product Environmental Footprint Category Rules (PEFCR) for apparel and footwear is a voluntary tool which provides rules for calculating the environmental impact of a product category. This set of standardised guidelines developed by the European Commission, are a part of the broader Product Environmental Footprint (PEF) methodology, which aims to provide harmonised approach for evaluating and comparing the environmental performance of products across the EU.

The PEFCR was developed by a Technical Secretariat composed of industry stakeholders, sustainability experts, and life cycle assessment (LCA) professionals. Its creation involved multiple rounds of public consultation, technical review, and validation by the European Commission. The challenge addressed by the Technical Secretariat was twofold: first, to accommodate the complex nature of apparel supply chains; and second, to ensure the methodology is accessible to both large and small market actors.

The PEFCR for Apparel and Footwear encompasses a broad range of textile and footwear products, grouped into 13 sub-categories.

- Garments: T-shirts, shirts/blouses, sweaters/mid layers, jackets/coats, pants/shorts, dresses/skirts/jumpsuits, leggings/tights/socks/stockings, underwear, swimwear, and accessories.
- Footwear: Open-toe shoes, closed-toe shoes, and boots.

Although these categories provide a practical structure, the PEFCR acknowledges that within-category differences (e.g. performance footwear vs. fashion shoes) present distinct environmental profiles. This necessitates adaptable modelling parameters within a standardised framework.

The current version (3.1) released April the 25th of 2025, validated by the European Commission and in effect until 2027, includes guidelines for thirteen sub-groups. The scope is cradle-to-grave and incorporates parameters relevant to sustainable product design, including recycled content, recyclability, durability, and reparability. The environmental performance is assessed using the European Commission's Environmental Footprint (EF) 3.1 Reference Package, which ensures consistency across assessments by requiring standardised datasets and modelling procedures. However, the current version

of the EF database expires by the end of 2025 and there is work in progress to update the EF database and release a 4.0 version.

In addition to core impact categories, the PEFCR partially addresses microplastic emissions via a fibre fragmentation module – to marine compartment only and does not allow for differentiation between the impact of new or second-hand items. Future development of the methodology is identified to relate to impacts on biodiversity and second-hand use as priority areas¹⁵.

Through an internal communication, the European Commission has confirmed that PEFCR could be used as the basis to establish the rules for calculating the environmental impact of textiles in the Delegated Act, which would mean to have a legal basis to be included in the Implementing Act establishing GPP criteria.

2.2.3 EU ecolabel

The EU Ecolabel for textile products¹⁶ covers various textile product groups such as textile clothing and accessories, interior textiles, fibres, yarn, fabric and knitted panels. Existing criteria focus on sustainable fibre production, the production process impacts, the use of hazardous substances, and durability of the final product. As it is the case of the GPP framework, circular economy-related criteria beyond recyclability, e.g. repair and reuse, are lacking in the current version of the EU Ecolabel for textiles. Recycled content is partially addressed for polyester and polyamide. The current criteria are based on Commission Decision (EU) 2014/350 of 5 June 2014, and their validity is until 31 December 2025, with the revision on-going.

The EU has also issued a specific set of EU Ecolabel criteria for footwear products. These criteria cover all kinds of footwear, including school, casual, town, sports, fashion, infants and indoor footwear. Current criteria are based on the Commission Decision (EU) 2016/1349¹⁷ of 5 August 2016 and the validity is also until 31 December 2025.

2.2.4 Other Labels

The JRC Preparatory Study identifies 73 global environmental labels applicable to textiles as of 2024, with 58 used in Europe. A summary of the ecolabels related to textiles used in Europe can be found in Table 2. Key ones include the EU Ecolabel described above and other Type I ecolabels such as Blue Angel (Germany) and Nordic Swan in the Nordic countries. A comprehensive list of the most addressed topics by these labels include:

- Toxics and harmful chemicals
- Natural resource usage
- Waste and recycling³
- Energy use and GHG emissions
- Water use and quality
- Pesticide and herbicide reduction

Table 2: Ecolabels related to Textiles used in Europe. Source: JRC Preparatory Study

Label Name	Environmental Focus Areas	ISO Type
EU Ecolabel	Chemicals, energy use, material use, water, toxics, durability, biodegradability, recyclability	Type I
Blue Angel	Carbon emissions, energy use, forests, natural resources, recycling, toxics, wastewater, water use	Type I
Nordic Swan Ecolabel	Pesticides, GMOs, harmful substances, energy use, water quality, chemicals, social aspects	Type I
Better Cotton Initiative	Biodiversity, pesticides, chemicals, soil, water quality, wastewater	Not specified
bluesign® standard	Chemicals, energy, toxics, material use, water, GHG emissions	Not specified

³ Repair and reuse are not explicitly considered by any of the reviewed labels

Carbon Reduction Label	Carbon/GHG emissions	Not specified
Climatop	Biodiversity, chemicals, carbon, energy, GMOs, soil, toxics, water	Not specified
Compostability Mark	Chemicals, natural resources, recycling, water quality	Not specified
Coop Naturaline	Biodiversity, chemicals, GMOs, natural resources	Not specified
Cradle to Cradle	Material use, recycling, waste, water, carbon, chemicals, toxics	Not specified
Demeter	Biodiversity, chemicals, energy, GMOs, natural resources, soil	Not specified
Eco Mark	Energy, forests, GMOs, natural resources, toxics, waste	Type I
Fair Trade Textile Standard	Biodiversity, chemicals, GMOs, social aspects	Not specified
Fair Wear Foundation	Social aspects	Not specified
FSC Recycled	Forests, recycling, natural resources	Not specified
GOTS	Biodiversity, chemicals, GMOs, toxics, natural resources, social aspects	Not specified
Green Mark	Chemicals, GMOs, toxics, water	Not specified

2.3 Other relevant initiatives

2.3.1 Enrico Letta's report on the future of the Single Market

In 2023, Enrico Letta received a mandate from the European institutions to elaborate a High-Level Report on the future of the Single Market. The report "Much More Than a Market"¹⁸, published in April 2024, offers a strong and strategic reframing of EU public procurement policy. Here's a detailed breakdown:

- Framing Public Procurement as Strategic Leverage: Letta emphasises that public procurement should be more than a price-based exercise, it must be a strategic tool aligned with broader EU objectives.
- The report calls for a "more European and more strategic public procurement market," integrated across Member States and used to deliver on green, digital, social, and industrial policy goals.
- It specifically criticises the current overreliance on the "lowest price" award criterion, which sidelines quality, innovation, and social/environmental value.
- Letta advocates for a "High Road" approach to procurement, i.e. no more race-to-the-bottom bidding, but rather procurement that promotes fair wages, high labour standards, and social inclusion.
- The report highlights the role of public procurement in stimulating demand for circular materials, products, and services, thereby supporting environmental sustainability and economic growth.

According to Letta's report, public tenders should actively support the green and digital transformation by embedding ecological and technological innovation directly into the criteria for awarding contracts, rather than treating them as secondary considerations. Public procurement is envisioned as a catalyst for innovation, particularly by enabling startups, small and medium-sized enterprises (SMEs), and scale-ups to deliver novel solutions in areas such as sustainability and digital technology. Moreover, the report emphasises that circular economic approaches must be systematically integrated into both public and private investments.

Letta's vision aligns public procurement with broader socio-economic objectives. It suggests using procurement to strengthen social economy enterprises and advocates for the inclusion of non-market value criteria, e.g. social fairness, territorial cohesion, ecological sustainability, and social inclusion, when evaluating tenders. To enhance accessibility, the report recommends breaking down large contracts into smaller lots and reserving some funding for social entities.

Further expanding on this vision, the report calls for the implementation of socio-environmental conditionalities. It proposes that social and environmental conditionalities should be applied in public funding and state aid, ensuring that only organisations which provide fair wages, uphold workers' rights, and honour collective agreements are eligible for support. Letta also encourages the EU to take cues from the U.S. Inflation Reduction Act, integrating tangible social and climate objectives into procurement and state support mechanisms.

To make procurement more strategic and effective, the report outlines several structural recommendations. These include:

- Fostering greater EU-level integration of procurement markets through harmonised regulations.
- Shared digital platforms.
- Coordinated joint tenders.

It further argues for a transition from non-binding EU directives to binding regulations to prevent member states from undermining strategic procurement goals. Additionally, it promotes the use of pre-market consultations, improved public-private partnership frameworks, and tools that balance fiscal sustainability with incentives for investors.

2.3.2 Mario Draghi's report on the future of European competitiveness

In September 2024, Mario Draghi published his report on the future of European competitiveness¹⁹. Here, Draghi addresses public procurement as a horizontal enabler across energy and industrial policy, focusing primarily on how public procurement can drive innovation, strategic autonomy, and support the green and digital transitions.

The report highlights that public procurement, especially at the EU and national levels, can catalyse investment in innovative sectors by creating lead markets through increased demand-side innovation, the scaling of emerging technologies and providing market certainty. These markets serve as a launchpad for European solutions in fields such as clean technologies, digital infrastructure, and advanced manufacturing.

However, Draghi identified several challenges that currently undermine the effectiveness of public procurement in the EU:

- Fragmentation across Member States: Different rules and priorities dilute the collective power of EU-wide procurement.
- Risk-aversion and administrative burden: Public authorities often prefer mature, low-risk technologies, discouraging innovative suppliers.
- Short-term focus: Procurement often prioritises upfront cost rather than lifecycle cost, total value, or broader policy objectives.
- Limited pre-commercial procurement: There is low uptake of mechanisms like pre-commercial procurement (PCP) and public procurement of innovation (PPI), which are essential for scaling nascent technologies.

The report also highlights the synergies of public procurement with other policy areas such as the Net-Zero Industry Act, the Green Deal Industrial Plan and Resilience and strategic autonomy initiatives.

2.4 Links between the ESPR and other policy initiatives

Figure 4 provides an overview of how the ESPR relates to other policy initiatives such as the Textile Labelling Regulation (TLR), the Waste Framework Directive, and PEFCRs on apparel and footwear (A&F).

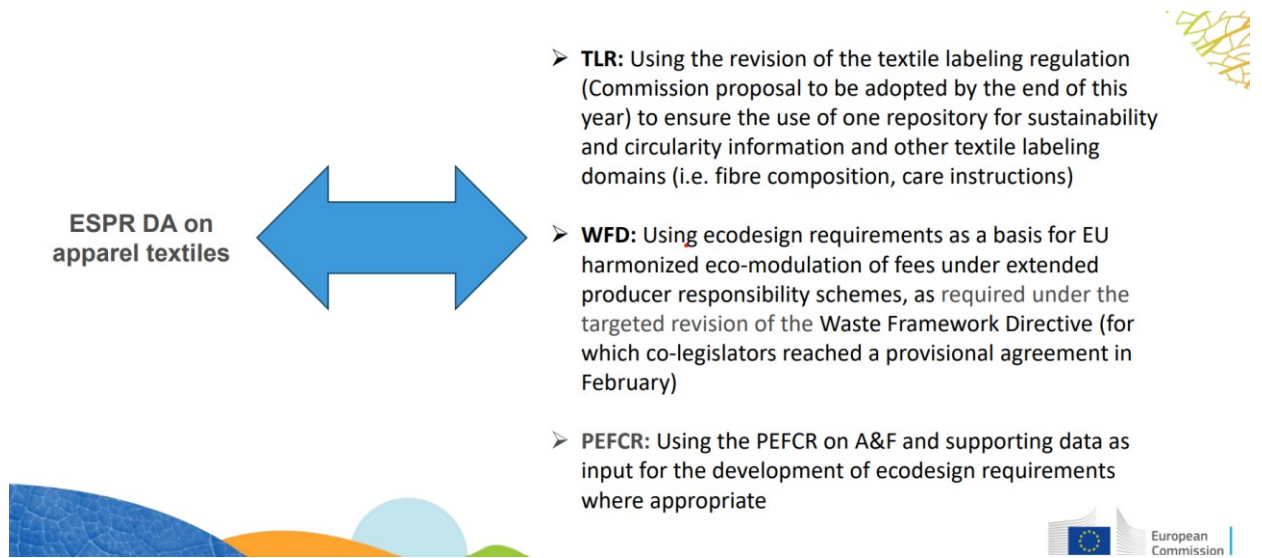


Figure 4: European Commission view on links between Ecodesign Delegated Act (DA) on apparel textiles and other EU policy initiatives²⁰

2.5 Summary of policy initiatives

Table 3 below provides a summary of the EU policy initiatives possibly impacting the public procurement of textile products in EU.

Table 3: Summary of the status of the EU policy initiatives and expected changes in short-medium term.

Initiative	Current Status	Expected changes in short- medium terms
Procurement Framework	Directives under evaluation (2014/23, 24, 25)	Likely inclusion of sustainability, resilience, local preference, and EU-made quotas. “Buy European” clause and strategic aims might allow preference for EU/regional suppliers
ESPR	Entered into force in June 2024	<ul style="list-style-type: none"> • Ecodesign requirements through Delegated Act • Mandatory GPP criteria through Implementing Act • Preparatory study ongoing
Textile GPP Criteria	Voluntary criteria since 2017	Due to be updated; some of the EU GPP criteria could become binding through ESPR Mandatory GPP
Textile Labelling Regulation	Regulation under revision	<ul style="list-style-type: none"> • Digital Labelling & Product Passports • Expanded Scope of Labelling Requirements (country of origin, sustainability credentials, care instructions, environmental and social information) • Inclusion of New Fibre Types (innovative and bio-based fibres (e.g., PLA, recycled cellulose) Recycled fibre specifications)

Initiative	Current Status	Expected changes in short- medium terms
Waste Framework Directive	Plenary vote in the European Parliament originally scheduled for 7 July 2025. Postponed until October 2025	Mandatory and harmonised Extended Producer Responsibility (EPR) schemes for textiles in all EU Member States
Ban on destruction of unsold goods	Destruction of unsold apparel, clothing accessories and footwear shall be prohibited from 19 July 2026	Proposed derogations are available since June 30 and feedback can be provided until 11 August.
Product Environmental Footprint Category Rules PEFCR	PEFCR for apparel and footwear Version 3.1 approved on 29 April 2025	<ul style="list-style-type: none"> • To integrate an impact category for biodiversity, improve data quality and to integrate impacts from fibre fragments and include second-hand use • If the EF 3.1 database is not updated by the end of 2025, the methodology is no longer valid, thereby the future of the PEFCR also depends on a new version of the EF database

3 Task 2: Identification of the process for the definition of mandatory GPP and opportunities for stakeholders to influence this process

The development of the JRC Preparatory Study (PS) includes the direct involvement of stakeholders, who will enable the JRC to verify with stakeholders the work under development and collect additional evidence on the investigated topics. Table 4 summarises the stages of the project that will require the participation of registered stakeholders. Any organisation, institution and citizen can register as a stakeholder by filling in a form on a dedicated webpage²¹. Stakeholders can register at any stage of the development of the PS.

Table 4: Development of the preparatory study for textile products (red, past date; green, ongoing)

Milestone	Topic to be addressed	Date
Initial questionnaire	Definitions, Scope, Market analysis, User Behaviour, Ecodesign aspects, EU Ecolabel, EU Green Public Procurement	30 March 2023 – 8 May 2023
1 st milestone	Scope, market, user behaviour, current EU Ecolabel criteria, current EU Green Public Procurement criteria	23 February 2024 – 22 April 2024
2 nd milestone	Technologies, framework and data gaps of environmental and economic model, and a questionnaire about substances of concern	14 November 2024 – 10 February 2025
3 rd milestone	Analysis of base cases and design options	End of Q2 2025
4 th milestone	Policy scenarios, and elements to be included in the digital product passport	Q4 2025

Note that in the second half of 2025 there will be two opportunities to provide feedback: one on the 3rd milestone (Analysis of base cases and design options) and another one on the 4th milestone (Policy scenarios, and elements to be included in the digital product passport). According to Figure 1, the full Preparatory Study should be published by early 2026.

Once the Preparatory Study is completed the Commission will call a dedicated meeting at the European Commission's new Ecodesign Forum²². The Forum established under the Ecodesign for Sustainable Products Regulation (ESPR), serves as a key consultation body, bringing together over 100 representatives from Member States, industry, NGOs, and academia to discuss the implementation of the ESPR and related energy labelling regulations.

The Ecodesign Forum includes 96 "Type C" organisations. This term refers to entities appointed as members to represent specific stakeholder interests. These organisations have been selected through an open call for applications and are responsible for nominating representatives who possess the requisite expertise and experience in areas such as product sustainability, ecodesign, or energy labelling policies. Examples of Type C organisations include industry associations, environmental NGOs, consumer groups, and research institutes.

Among the organisations selected by the Commission as Type C Members of the Ecodesign Forum, with an interest in the textile / apparel sector there are:

- **European Apparel and Textile Confederation (EURATEX):** EURATEX has been selected as a member of the Ecodesign Forum. As the principal voice of the European textile and clothing

industry, EURATEX actively engages in shaping sustainable regulations for textiles under the Ecodesign for Sustainable Products Regulation (ESPR). Their participation ensures that the industry's perspectives are considered in discussions surrounding ecodesign and sustainability.

- **European Textile Services Association (ETSA):** ETSA represents Europe's largest textile rental firms, suppliers, and national textile services associations, focusing on promoting the interests and concerns of the textile service industry. The association works closely with its members and national associations to influence policies at the European level and serves as a platform for discussing best practices. ETSA also monitors and responds to developing EU legislation to ensure the interests of the textile industry are represented.
- **Policy Hub – Circularity for Apparel and Footwear.** Policy Hub is actively involved in the European Commission's Ecodesign Forum. As a coalition representing over 700 stakeholders including brands, retailers, manufacturers, and industry associations—the Policy Hub plays a significant role in shaping sustainable product policies within the EU. The Policy Hub was established in 2019 by key industry organisations: the Sustainable Apparel Coalition (now Cascale), the Federation of the European Sporting Goods Industry (FESI), and Global Fashion Agenda (GFA). It aims to unify the apparel and footwear industry's voice to advocate for ambitious policies that promote circularity and sustainability throughout the product lifecycle.
- **Reuse and Recycling European Union Social Enterprises (RREUSE).** RREUSE is a network of social enterprises active in reuse, repair, and recycling. While their scope covers various sectors, they have a vested interest in textiles, particularly in promoting circular economy practices. Their involvement in the Ecodesign Forum helps integrate perspectives on reuse and recycling into the development of sustainable product regulations.

The participation in the consultation activities under the Ecodesign Forum can have an influence on the output of the policy process. In this context it is evident the lack of organisations representing interests of professional procurers (including public procurers).

As discussed in section 2.1.2, the ESPR provides for the possibility to set mandatory minimum requirements for public procurement in ad hoc implementing acts, whenever the products regulated by ESPR delegated acts are relevant for public buyers and it is economically feasible for them to buy the best environmentally sustainable products. These measures are designed to foster the creation of lead markets, stimulate investments and help the EU industry improve its competitiveness in line with the Clean Industrial Deal's objectives. The Commission will assess the scope to set those minimum public procurement requirements for the products prioritised in the working plan together with the assessment of the specific ecodesign requirements for the same products. For the first ESPR working plan, the priorities were set in the Regulation (Article 18) itself, with textile products being identified as priority product.

Despite being two separate legal acts, the delegated act setting ecodesign requirements and the implementing act setting public procurement requirements are closely linked because the product aspects covered in both acts must be the same. Therefore, the Commission will study and assess the measures jointly and run the two adoption procedures in parallel.

According to the Better Regulation Guidelines²³, an Impact Assessment (IA) is required for certain types of EU policy initiatives to ensure that decisions are evidence-based, transparent, and deliver value for citizens, businesses, and public administrations. In the case of implementing acts, an IA is necessary if they are expected to have significant impacts, as it is the case of mandatory GPP criteria for textile products. An Impact Assessment on the implementing act for textiles GPP criteria is expected in 2026, although the Commission has stated that, at this stage, they cannot comment whether the same impact assessment will cover both the delegated and implementing acts or there will be a dedicated IA for each policy instrument.

Every IA must be accompanied by a consultation strategy, as outlined in the European Commission's Better Regulation Guidelines, which is designed to ensure that stakeholders are meaningfully involved throughout the policy-making process. The consultation strategy typically consists of the following stages:

- Call for Evidence (CfE): it runs for 4 weeks, it is published on the Have Your Say portal, and it is open for feedback from the public and stakeholders.
- Open Public Consultation (OPC): running for 12 weeks, it is typically conducted via an online questionnaire, and it covers the problem definition, policy objectives, options and likely impacts. It is made available in all official EU languages.
- Targeted consultations: it consists of thematic Interviews, workshops, or surveys with specific stakeholder groups, e.g. businesses, NGOs, national authorities.

A summary of the opportunities to influence the process for the definition of mandatory GPP criteria for textiles can be found in Table 5. In this context we would recommend that consultations covering green public procurement and targeted consultations with public procurement experts should be planned by the European Commission.

Table 5: Summary of opportunities to influence the process for the definition of mandatory GPP criteria for textiles

Type of initiative	Type of feedback	When
3rd milestone PS	Analysis of base cases and design options	End of Q2 2025
4th milestone PS	Policy scenarios, and elements to be included in the digital product passport	Q4 2025
Impact Assessment for textiles delegated act (it may also cover implementing act)	Call for evidence	2026 (to be determined)
	Open public consultation	
	Targeted consultation	

4 Task 3: Identification of the most relevant policy makers and stakeholders

Table 6 identifies relevant Directorates-General (DGs) involved in the relevant policy initiatives, while Table 7 highlights EU stakeholders outside of the Commission.

Table 6: European Commission's Directorates-General (DGs) and policy officers involved in different initiatives

Topic	Contact persons
ESPR, GPP, Ecolabel	<ul style="list-style-type: none"> Carsten Wentink. The Directorate-General for Environment (DG-ENV) Antonio Delre (Preparatory study). The Directorate-General for Joint Research Centre (DG JRC)
Circular Economy Act	<ul style="list-style-type: none"> Ivan Azevedo. The Directorate-General for Environment (DG-ENV)
Public Procurement Directives	<ul style="list-style-type: none"> Anna Lupi. The Directorate General for Internal Market, Industry, Entrepreneurship and SMEs (DG GROW)
EPR	<ul style="list-style-type: none"> Karolina D'Cunha. The Directorate-General for Environment (DG-ENV)
Textile Labelling Regulation	<ul style="list-style-type: none"> Anna Lupi. The Directorate General for Internal Market, Industry, Entrepreneurship and SMEs (DG GROW)

Table 7: Stakeholders at European level relevant to the textiles sector

Organisation	Context	Website
EURATEX	European Apparel and Textile Confederation	https://euratex.eu/
EuRIC	The umbrella organisation for the recycling industry in the EU (inc. textiles recycling)	https://euric.org/
EBCA	European Branded Clothing Association	https://ebca-europe.org/
ETSA	European Textile Services Association	https://www.textile-services.eu/
RREUSE	Reuse and Recycling European Union Social Enterprises	https://www.rreuse.org/
BIR	The Bureau of International Recycling	https://www.bir.org/en/
FESI	The European Federation of the Sporting Goods Industry	https://fesi-sport.org/
CEC	European Footwear Confederation	http://cec-footwearindustry.eu/

5 Task 4: Advise on how GPP criteria can be better aligned with the ESPR circular product aspects and other (emerging) (EU) legislation on textiles

5.1 The role of GPP criteria compared to ecodesign and ecolabel

Through Directive 2009/125/EC, Ecodesign sets mandatory requirements for energy-related products sold in the EU to improve their environmental performance. More recently, with the adoption of the ESPR (Regulation (EU) 2024/1781), the focus has also been extended to non-energy-related products such as textiles and furniture. On the other hand, the EU Ecolabel is a voluntary certification scheme that identifies products and services with a reduced environmental impact across their life cycle. This is intended to help consumers make informed and sustainable choices. Green public procurement can leverage both by for example using Ecolabel as evidence of compliance and excluding products not meeting Ecodesign rules. Figure 5 depicts how different product policy initiatives relate to each other in terms of their ambition levels.

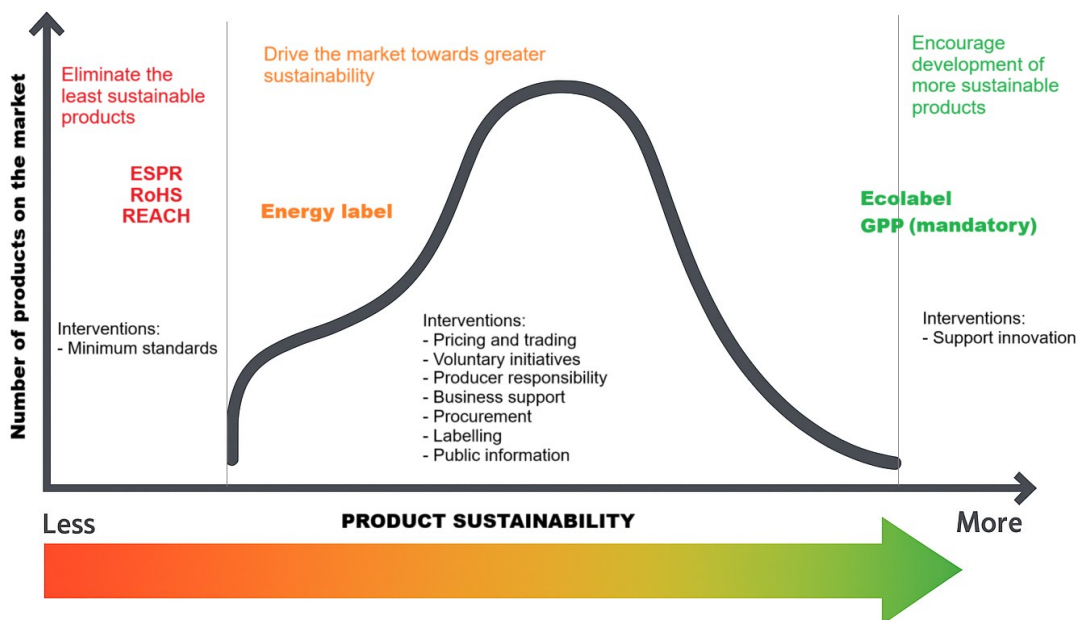


Figure 5 Scope of different product policy instruments in the EU (adapted from Galatola (2015)²⁴)

5.2 GPP criteria alignment with ESPR

To enhance the effectiveness and market relevance of Green Public Procurement (GPP), a comprehensive strategy is needed to ensure close alignment with the requirements of the Ecodesign for Sustainable Products Regulation (ESPR). As public procurement plays a critical role in shaping sustainable product markets, it must increasingly reflect the ambitions of the ESPR, particularly in the textile sector.

First, ecodesign and GPP criteria should be aligned in terms of scope and product aspects addressed. Mandatory and voluntary GPP should be set in relation to the product aspects addressed in the ecodesign delegated act adopted. If an index with performance classes is introduced (e.g. durability index) minimum GPP requirements shall be based on the two highest performance classes, similarly to the approach used on energy-related products under the Energy Efficiency Directive.

Award criteria can be much more ambitious than ecodesign minimum requirements and, where appropriate, should have a minimum weighting of between 15 % and 30 % in the awarding process which enables them to have a significant impact on the outcome of the tendering procedure, and which favours

the selection of the most environmentally sustainable products. Finally, wider GPP strategies and policy could set targets requiring that a certain percentage of the annual national procurement meets environmental performance requirements above the minimum level. The implementing acts shall be adopted in accordance with the examination procedure referred to in Article 73(3) of the ESPR.

In its Article 5, the ESPR sets the 16 product aspects that must be considered to address the product's environmental impact. In line with the Commission's Textile Strategy¹¹, of these 16 aspects, the following are considered particularly relevant for textile products.

- **Durability, reusability, repairability, and recyclability** of textile products to reduce environmental impact and extend product life.
- **Restrictions on harmful chemicals** to protect human health and the environment.
- **Minimum recycled content** and clear disclosure of **material composition** to support secondary raw material markets.
- **Energy, water and resource use.**

To operationalise these ESPR principles within GPP frameworks, it is recommended to update technical specifications in GPP criteria to explicitly require:

- Demonstrable product durability and lifespan, such as performance guarantees or minimum wash-cycle requirements.
- Access to repair services and spare parts, ensuring maintainability throughout the product's use phase.
- A defined percentage of recycled content harmonised with ESPR targets and verifiable through third-party certification.
- Provision of a Digital Product Passport (DPP) by suppliers, with data fields consistent with ESPR requirements.

Furthermore, in the absence of EU Ecolabel criteria, it is recommended to include lifecycle assessment (LCA) as part of procurement evaluation processes to account for environmental impacts beyond price and quality. In line with this, third-party verification or conformity assessments can be mandated, ensuring compliance with ESPR benchmarks and enabling standardised enforcement across suppliers and jurisdictions.

By embedding these measures into procurement procedures, GPP can act as a strategic tool to stimulate demand for ESPR-compliant textile products, foster innovation, and accelerate the market shift toward a circular and sustainable European economy.

5.3 GPP criteria alignment with EU Ecolabel

The European Commission is currently revising the EU Ecolabel criteria for textile products as part of its efforts to align with the EU Strategy for Sustainable and Circular Textiles and the Ecodesign for Sustainable Products Regulation. This revision is being informed by a preparatory study that will serve as the technical and scientific foundation for future ecodesign requirements, green public procurement criteria, and updated EU Ecolabel standards for textiles.

Aligning Green Public Procurement (GPP) criteria more closely with the EU Ecolabel for textiles can significantly streamline sustainability requirements, promote consistency across policy instruments, and simplify implementation for public authorities and suppliers.

Three recommended alignment measures can be proposed:

1. **Use of the EU Ecolabel as a default reference:** this consists of requiring or preferentially awarding suppliers whose products are EU Ecolabel-certified or equivalent,

e.g. Nordic Swan, OEKO-TEX, GOTS for organic fibres, etc. This can be complemented by offering additional scoring or price-quality weighting to certified products.

2. **Technical specifications harmonised with Ecolabel criteria:** incorporate chemical restrictions consistent with the EU Ecolabel, e.g. banned azo dyes, formaldehyde thresholds, etc. Also, require minimum performance benchmarks for wash resistance, shrinkage, colourfastness, etc., all mirroring durability tests in the Ecolabel. Finally, reflect EU Ecolabel thresholds for recycled content and sustainable raw materials such as organic cotton or recycled polyester.
3. **Verification via Ecolabel Certification:** accept EU Ecolabel (or equivalent ecolabels type-I) certificates as sufficient proof of compliance for relevant sustainability aspects, streamlining verification processes. This eliminates the need for fragmented document review and LCA analysis when Ecolabel is used instead.

To enhance uptake and market readiness, public authorities should engage suppliers early to encourage EU Ecolabel certification and avoid excluding capable vendors. Procurement staff should receive training to apply Ecolabel-aligned criteria effectively, ensuring consistency and confidence in implementation. Pilot tenders can be used to test full alignment with the EU Ecolabel, allowing lessons to be drawn on feasibility, market availability, and administrative efficiency before broader rollout.

5.3.1 Mention of GPP criteria in the JRC Preparatory Study

In December 2024, the JRC published a document²⁵ containing the feedback that was provided by stakeholders through the consultation on the 1st milestone working document: Scope, market, user behaviour, current EU Ecolabel criteria, current EU Green Public Procurement criteria. Stakeholders provided mixed but constructive feedback on the treatment of public procurement and existing GPP criteria. Key themes include:

- **Limited uptake and fragmentation:** several stakeholders pointed out that GPP criteria are underutilised across Member States. The voluntary nature and lack of harmonization have led to fragmented application, with some regions showing stronger implementation than others. They recommended making GPP criteria mandatory or linking them more clearly with the forthcoming ESPR requirements.
- **Need for stronger alignment with EU Ecolabel and ESPR:** it was widely agreed that GPP criteria should reflect EU Ecolabel requirements, as well as the circularity and product performance standards introduced under ESPR. This would ensure consistency across instruments and send a clear market signal.
- **Procurement as a strategic lever:** stakeholders emphasised the potential of GPP to stimulate demand for sustainable textile products and suggested it be used more strategically. Suggestions included:
 - Prioritizing durability, recyclability, and non-toxicity.
 - Using Digital Product Passport information during procurement.
 - Rewarding suppliers based on verified sustainability performance.
- **Verification and feasibility challenges:** concerns were raised about administrative complexity and feasibility for contracting authorities, particularly around verifying compliance with criteria such as recycled content or hazardous substance restrictions. Stakeholders advocated for the adoption of clear, standardised documentation and templates, as well as third-party certifications such as the ones used in the EU Ecolabel as default proof of compliance.
- **Capacity Building:** there were calls for improved **capacity-building tools**, such as procurement training for public authorities, centralised platforms for sustainable suppliers and case studies showcasing successful GPP implementation in textiles.

5.4 Mandatory vs. voluntary criteria and wider possibilities for public procurers to set requirements.

In the current policy context, the EU Green Public Procurement criteria can be established as mandatory legislation (at EU level) through the ESPR or at voluntary level, based on the EU GPP Criteria¹⁴ guidance documents issued by the European Commission as Staff Working Documents. Furthermore, mandatory and voluntary criteria could potentially go hand in hand whereby a mandatory minimum is set upon which it is possible to add on voluntary extras. Strengths and weaknesses of the two approaches are reported in Table 8.

Mandatory GPP at European Level established under the ESPR have the advantage of providing consistency, level playing field and high market impact, ensuring environmental outcomes at EU level. Nevertheless, mandatory GPP cannot have a high level of ambition, due to possible issues of market distortion if suppliers from certain regions or sectors cannot comply easily with mandatory GPP requirements, reducing competition.

On the other hand, the voluntary GPP Criteria of the European Commission criteria developed by the Joint Research Centre (JRC), have ensured more flexibility for public authorities, giving the opportunity to adapt criteria to the local contexts, capacities, and priorities. Voluntary criteria allow procurement officers to experiment with green procurement without legal constraints, selecting criteria and level of ambition better fitting their context, helping to develop best practices and benchmarks that eventually can evolve into future mandatory requirements. With a voluntary GPP approach, public bodies can incrementally adopt sustainability criteria, reducing the risk of procurement failure or legal challenges. On the other hand, voluntary EU GPP have been suffering from low level of enforcement / inconsistent uptake across Europe, with some procurement frontrunners and other lagging behind due to limited institutional capacity or awareness.

Commission sources have hinted that mandatory GPP criteria will supersede voluntary ones once the Implementing Act is approved, provided that both address the same product aspects and considering that the voluntary GPP Criteria are not updated since 2017 (the Commission does not plan to update the current voluntary criteria).

Table 8: Strengths and weaknesses of Mandatory and Voluntary GPP Criteria.

	Mandatory GPP Criteria	Voluntary GPP Criteria
Strengths	Consistency, level playing field and high market impact, supporting laggards, ensuring environmental outcomes at EU level	Flexibility, encourage innovation, supporting frontrunners, creating positive incentives instead of penalties
Weaknesses	Less flexible tool, lower ambition level due to the need to adapt to regional differences	Low enforcement and inconsistent uptake

5.5 Documentation and market surveillance

Documentation and market surveillance play a crucial role in ensuring that GPP criteria are effectively implemented, credible, and enforceable. Proper documentation allows contracting authorities to verify compliance with environmental and social requirements, while market surveillance ensures ongoing conformity and prevents greenwashing or non-compliant products from entering public procurement channels.

The documentation focus varies significantly between GPP, EU Ecolabel, and ESPR frameworks. In GPP, the documentation primarily aims to demonstrate compliance with the technical specifications / award criteria defined in the tender documents. This often involves targeted evidence for specific environmental

or social criteria included in the procurement process. In contrast, the EU Ecolabel requires a much broader and more holistic environmental performance certification, covering multiple lifecycle stages and verified through comprehensive third-party assessments. The ESPR represents a further evolution by introducing full lifecycle documentation through digital product passports, ensuring complete traceability of product characteristics, environmental impacts, and compliance information across the entire supply chain.

Another important aspect is the level of verification required under each framework, which reflects their respective level of ambition and enforcement mechanisms. In GPP, verification often relies on supplier self-declarations, which may be supported by third-party certificates where appropriate, but third-party verification is typically optional and left to the discretion of the contracting authority. Since contracts are assigned based on claimed environmental performance, a rigorous verification scheme becomes even critical. The EU Ecolabel, however, mandates independent third-party verification of all claims, ensuring that all certified products meet the full range of environmental and performance criteria established by the EU Ecolabel Regulation. Under the ESPR, verification is carried out by national market surveillance authorities, who perform inspections based on risks or random sampling. In the codesign context, national authorities also conduct document checks (technical documentation, CE marking, declarations of conformity) and perform testing procedures in accredited laboratories to assess compliance with ecodesign parameters, e.g. energy efficiency, standby power, material use, etc.

Finally, the enforceability of requirements also differs considerably between the three frameworks. In voluntary GPP, enforceability largely depends on the capacity and diligence of individual contracting authorities, leading to variations in how strictly requirements are applied and verified. EU Ecolabel offers stronger enforceability through a centralised EU framework, with national competent bodies responsible for certification, monitoring, and potential sanctioning of non-compliant products. The ESPR introduces the highest level of enforceability, embedding compliance obligations directly into EU product legislation. Its legal framework requires that non-compliant products cannot be placed on the EU market, with enforcement supported by customs authorities, market surveillance bodies, and the systematic use of digital product passports for efficient compliance verification.

5.6 Important aspects for the workwear sector

Alignment with ESPR is important. However, the differences between applications should be reflected in the definition of requirements.

5.6.1 Technical durability vs. emotional durability

For workwear, technical durability is one of the most critical factors in determining environmental impact. These garments are designed for repeated, intensive use and must withstand frequent industrial washing⁴, mechanical stress, and wear over time. The longer a product lasts while maintaining functionality, the more its environmental impact is spread out over time, reducing the impact per use. Therefore, maintaining high durability is essential for minimizing the total environmental footprint of workwear.

In contrast, for fashion and other apparel items, the relationship between durability and sustainability is less straightforward. The number of times a fashion garment is used often depends on aesthetic preferences, trends, or consumer behaviour rather than the garment's physical durability. In such cases, it may be acceptable to make trade-offs that slightly reduce technical durability if they lead to significantly lower impacts from material production or improved recyclability, for example, by simplifying fibre types or using low-impact materials.

Ultimately, requirements and regulations related to fibre choices and material design need to be differentiated between workwear and fashion. For workwear, durability is essential and must be prioritised to minimise environmental impacts over the product's lifetime. Although workwear is included in the scope

⁴ Professional washing, drying and repairing may extend the product lifespan and enhance longevity and durability

of the JRC Preparatory Study, the abovementioned differentiation is not reflected yet in the current work under the PS (development of policy options). Regulatory frameworks and procurement criteria should therefore reflect the need for high performance, longevity, and compatibility with industrial laundering.

5.6.2 Use of recycled content

In the workwear sector, where durability is critical to extending product life and minimizing environmental impacts, this has become a key concern. Depending on the recycling technology used, some recycled fibres like cotton can be shorter and weaker, which can compromise textile strength and longevity²⁶, which is an unacceptable trade-off in garments designed for heavy use.

Using recycled PET from food-grade bottles also poses a sustainability dilemma, as diverting it to textiles breaks the closed-loop system of packaging recycling, leading to increased demand for virgin plastic.

Recycled fibres from discarded textiles, via mechanical or chemical processes, are alternatives. Mechanical recycling is more widespread and less energy-intensive but typically results in shorter fibres. However, this technology is rapidly advancing, gradually improving the quality and environmental value of recycled fibres.

5.6.3 Limiting mix of fibre types

To improve recyclability, it is not uncommon to apply “design for recycling” principles and recommend a limit on the number of different fibre types allowed in a textile²⁷. The idea is that garments made from fewer materials are easier to sort and recycle at end-of-life, especially in mechanical recycling systems where fibre separation is a challenge. While this approach can support circularity, it can also introduce trade-offs in garment performance and durability.

In workwear, a common fibre blend is polyester and cotton, typically in 50/50 or 65/35 ratios. This combination balances comfort (from cotton) with durability and wash resistance (from polyester), which is essential for garments that must withstand frequent industrial laundering. Many manufacturers also include a small percentage (around 3%) of a stretch fibre such as elastane or EOL to improve comfort and fit. Although some fabrics achieve stretch mechanically, stretch fibres are more commonly used.

A major challenge arises when procurement specifications limit materials to just two fibre types. This often forces manufacturers to compromise: either exclude stretch (reducing comfort) or remove cotton (reducing comfort), since polyester is typically needed to maintain durability. Limiting fibre types in this way could therefore hinder both performance and sustainability goals in workwear.

6 Task 5: Identify frontrunners

Until 2024, the Danish EPA previously operated a Green Public Procurement initiative called *Partnerskab for Offentlige Grønne Indkøb* (POGI) — the Partnership for Green Public Procurement. Through this initiative, municipalities, regions, and other public authorities could choose to become members, thereby committing to specific GPP criteria (such as those for textiles) defined under the partnership. The initiative was discontinued at the end of 2024. Despite this, the Danish EPA continues to prioritise the textile agenda and is closely monitoring the progress of the JRC Preparatory Study.

In addition, several Danish regions, particularly Region Midtjylland and Region Hovedstaden, maintain a strong focus on textile circularity. They have carried out multiple projects aimed at reducing the use of single-use textiles in the hospital sector.

Researchers at Aalborg University (AAU) have developed a publication titled “Practical Guidelines for Circular Public Textile Procurement”, which outlines actionable strategies for public institutions aiming to green their textile procurement. The report includes criteria design, risk management in supply chains, and guidance on market dialogue with circular textile providers. If accessed, the publication could offer one of the few academically grounded resources tailored to the operational realities of procurement officers²⁸.

Recently, the Interreg EU project “Closing the loop on Circular Medical Textiles for the transition to a circular economy (CEMTex) was launched. In the period from May 2025 to end July 2029 the following countries NL, DK, CZ, RO, IT, LU, ES are working on identifying bottlenecks in both public procurement frameworks on demand-side as well as the logistical and compliance on the supply side²⁹.

The City of Vienna is also identified as a frontrunner in the transition to Green Public Procurement, by being pro-active since 1998 with ÖkoKauf, a programme for procurement of green products and services – including textiles³⁰. Through initiatives like ÖkoKauf Vienna has procured sustainable products and services across municipal departments, setting an early precedent for integrating circularity, health, and resource efficiency in public tenders.

Health Care Without Harm has partnered with the Norwegian Retailers’ Environment Fund (NREF) in a two-year international initiative (2024–2026) aimed at transforming textile production and consumption practices across Latin America, Southeast Asia, and Europe. The project is positioned within a broader movement to address the global plastics crisis by promoting alternatives to plastic-based textiles and reducing the use of harmful chemicals. Key project activities include supporting sustainable material innovation, increasing awareness in the healthcare sector, and strengthening cross-regional collaboration³¹.

RegioGreenTex is a flagship EU-funded initiative launched in January 2023 under the International Innovation Investments instrument, supported by the European Regional Development Fund and through the European Innovation Council and EISMEA. Coordinated by The European Apparel and Textile Confederation, EURATEX, with a consortium of 43 partners—including regional authorities, industry clusters, SMEs, research institutes, and local governments across 11 regions in 8 countries (Belgium, Czechia, Denmark, Italy, Netherlands, Portugal, Romania, Spain, Sweden, France)—the project aims to catalyse circularity in Europe’s textile sector³². The key objectives are:

- **Mapping needs and potential:** Across regions to identify economic and institutional barriers to circular textile adoption
- **Building a digital ecosystem at EU level:** to link supply and demand, enhancing transparency and collaboration
- **Supporting SME pilots:** using recycled-content solutions, with technical coaching and methodology exchange
- **Establishing five regional recycling hubs – “ReHubs”:** aligned with the EU Textile Strategy to foster circular value chains
- **Mobilising investment:** by creating regional business cases for circular textile value chains

Local Governments for Sustainability (ICLEI's): Circular procurement benchmarking between EU and China. ICLEI's 2024 publication "*Benchmarking Guide: Transition to a Circular Economy in the Textile and Apparel Industry*" provides insights from EU–China cooperation on sustainable textile systems. The guide outlines lessons from municipal procurement initiatives, identifies barriers in supply chain verification, and offers case-based indicators for circular transition in public purchasing. It contributes to knowledge-sharing among local governments and reinforces the relevance of procurement as a systems-change tool³³.

Ghent University Hospital in Belgium has become a leading example of sustainable workwear procurement in Europe. Through a process of extensive market dialogue and needs-driven specification, the hospital integrated circularity, social standards, and functionality into its tendering process. The initiative serves as a replicable model for healthcare institutions across Europe seeking to reduce environmental impacts through public procurement³⁴.

Other examples of frontrunners in GPP include:

The Netherlands – Sustainable Public Procurement (SPP)

In the Netherlands, procurers can use the "SPP criteria tool"³⁵ to collect the most recent Sustainable Public Procurement (SPP) criteria for their purchasing document. It provides suitability requirements, selection criteria, requirements, rewarding criteria and contract provisions. It contains criteria for three ambition levels. Workwear is one of the product groups for which the tool provides criteria. The tool is being updated periodically based on feedback from experts and users, (policy) developments³⁶ and best practices. Best practices on circular procurement are developed and collected in buyer groups and communities of practice. Circular workwear is one of the product groups focused on in these groups.

France – Mandatory Environmental Labelling on Textiles

As part of its 2020 Anti-Waste Law for a Circular Economy, the French government introduced a requirement (Article 15) for mandatory environmental labelling of all textile products sold in France by 2024. The labelling scheme is based on the 'Ecobalyse' methodology—France's version of the Product Environmental Footprint (PEF)—and developed by the French Agency for Ecological Transition, ADEME. While focused on consumer transparency, the policy has implications for public procurement by enabling clear sustainability comparisons between products³⁷.

Germany – the German Environmental Agency: Leveraging the Blue Angel Label for Textile Procurement

Germany extensively integrates its Blue Angel (Blauer Engel) ecolabel into public textile procurement. Under the 2016–17 German public procurement reform, federal and municipal buyers are allowed to reference Blue Angel certification (or equivalent Eco-labels like the EU Ecolabel) as technical or award requirements, simplifying verification of environmental claims³⁸. The criteria for Blue Angel textiles (DE-UZ 154) were revised recently, with recommendations now addressing circularity features such as fibre choice³⁹.

Italy – Italian Ministry of Environment with Criteri Ambientali Minimi (CAM) Textiles

Under Italy's CAM (Criteri Ambientali Minimi) framework—established via the Ministry of the Environment—public tenders for textiles must comply with minimum environmental specifications, including recycled fibre content declarations and restrictions on hazardous substances. Procurement bodies often engage expert legal assistance to design tender documents and evaluation clauses aligned with CAM, ensuring textile acquisitions are both legally robust and environmentally progressive⁴⁰.

Spain – Collection systems and Extended Producer Responsibility

Spain is advancing its Circular Economy and EPR policies aimed at textiles through two key measures⁴¹:

Re-Viste – A pilot project launched in 2025 across six municipalities, testing municipal textile collection systems via community containers to improve sorting and recycling rates

Law 7/2022 Under Spain's national GPP plan (2022–2025), this law requires establishment of an EPR scheme for textiles by April 2025, supporting sustainable waste management compatible with public procurement objectives⁴².

Sweden – *Emphasis on Dyeing Standards, Durability, and Traceability*

Sweden's Upphandlingsmyndigheten (Public Procurement Authority) has developed detailed procurement criteria for textiles that mandate⁴³:

- Boilerplate wastewater treatment levels in dyeing,
- Supplier quality assurance routines and chain-of-custody,
- Emphasis on long-lasting and easily maintainable textiles

Additional national policy requires municipalities to adopt criteria promoting circular features such as product repairability and extended warranties in textile procurements starting in 2025.

Finland – *National Guidelines & Responsible Procurement Strategy*

Finland's 2024–27 national procurement strategy emphasises responsibility criteria, including circularity and sustainability, in public contracts—textiles fall under these emerging standards. In practice, authorities like TUKES (the Finnish Safety and Chemicals Agency) embed technical specifications and performance requirements—for instance, revolution in textile reuse models—into tenders, aligning with EU ecodesign and product passport principles⁴⁴.

7 Concluding remarks

The report outlined the growing relevance of Green Public Procurement (GPP) as a strategic policy instrument to support the EU's transition towards a circular and sustainable economy. In a context where textile products are increasingly recognised for their significant environmental and social impacts, the alignment of procurement practices with EU sustainability legislation is both timely and necessary. The adoption of the Ecodesign for Sustainable Products Regulation (ESPR) provides a strong legal and procedural foundation for setting mandatory GPP criteria for textiles, a step that will reshape how public authorities engage with markets, suppliers, and sustainability objectives.

Several EU policy initiatives are converging in their ambition to make textile products more durable, recyclable, non-toxic, and resource efficient. These include ESPR, the revision of the EU Public Procurement Directives, the Waste Framework Directive (introducing harmonised Extended Producer Responsibility for textiles), the Textile Labelling Regulation, and the Product Environmental Footprint Category Rules. While each of these instruments serves a specific purpose, they collectively reinforce the broader policy vision articulated in the EU Strategy for Sustainable and Circular Textiles. Procurement will be essential in translating this vision into market action, at the very least in the professional wear sector.

Public authorities, however, must be adequately supported in navigating this complex regulatory landscape. The success of mandatory GPP will depend not only on well-designed legal texts but also on the practical tools, verification mechanisms, and capacity-building measures available to implement them effectively. This is particularly true for local and regional authorities, many of whom may have limited resources to adopt advanced procurement strategies. Equally important is ensuring that SMEs and innovative suppliers across the textile value chain are not excluded by overly burdensome criteria but instead empowered to participate in the sustainable transition.

It is also clear that meaningful stakeholder engagement (including from procurers themselves) is crucial to ensuring that future GPP criteria are robust, realistic, and impactful. The ongoing Preparatory Study by the JRC, as well as upcoming impact assessments and implementing acts, present vital opportunities for stakeholders to shape the outcomes of the ESPR process. To that end, the report has identified key milestones and recommended strategic entry points for feedback and influence.

Finally, frontrunner initiatives at both national and municipal levels demonstrate that sustainable textile procurement is already feasible and impactful when political will, technical guidance, and market readiness align. These examples should serve as inspiration for scaling best practices across the EU and for reinforcing the EU's leadership in sustainable product policy.

By setting coherent, mandatory GPP criteria for textiles, the EU could transform public procurement from a transactional process into a catalyst for systemic change, ensuring that sustainability is embedded not only in what governments buy, but in how they shape markets for the common good.

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