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**Internal Market and
Consumer Protection**



**STUDY ON LABELLING
OF TEXTILE PRODUCTS**

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DIRECTORATE GENERAL FOR INTERNAL POLICIES
POLICY DEPARTMENT A: ECONOMIC AND SCIENTIFIC POLICIES

INTERNAL MARKET AND CONSUMER PROTECTION

Study on labelling of textile products

Abstract

The debate on textile labelling was spurred by a recent proposal for a Regulation on textile names and related labelling of textile products. This study investigates whether other textile labelling requirements could be brought up in EU legislation, including care instructions, chemical substances in textiles, electronic labelling (RFID), multi-lingual, country of origin, ecological, and size labelling.

Generally, the consumer organisations do not follow the area of textile labelling very closely, with the exception of chemical labelling, because improper textile labelling does, in most cases, not present a risk to consumers' health. However, consumer organisations generally favour harmonised, mandatory systems in order to ensure that consumers meet the same information across the EU. Industry organisations are generally in favour of voluntary systems, primarily due to the costs associated with mandatory system(s). For the member states, any mandatory labelling system would increase requirements for market surveillance.

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LIST OF ABBREVIATIONS

AEDT	European Association of Fashion Retailers
ANEC	The European Consumer Voice in Standardisation
BRIDGE	Building Radio frequency IDentification solutions for the Global Environment
CIRFS	The International Rayon and Synthetic Fibres Committee
DEKRA	Product Testing and Inspection Organisation
Euratex	The European Apparel and Textile Confederation
GINETEX	International Association for Textile Care Labelling
KEPKA	Greek Consumer Organisation
MSA	Market Surveillance Authorities
MS	Member State(s)
RAPEX	EU alert system for dangerous products
REACH	European Community Regulation: Registration, Evaluation, Authorisation and Restriction of Chemical substances
RN	Registered Identification Number
RFID	Radio Frequency Identification
VKI	Austrian Consumer Organisation
VZBV	The Federation of German Consumer Organisations
ZPS	Consumer Organisation of Slovenia
Test-Achats	The Belgian Consumer Organisation

EXECUTIVE SUMMARY

The debate on textile labelling was spurred by a recent proposal for a Regulation on textile names and related labelling of textile products (COM/2009/0031 final/2). This study investigates whether other textile labelling requirements could be brought up in EU legislation, looking at possible ways in which the textile labelling regime could be improved.

Generally, the consumer organisations do not follow the area of textile labelling very closely, with the exception of chemical labelling. Reasons include the fact that missing or improper textile labelling is not a risk to consumers' health (again, with the exception of chemical labelling). However, interviewed consumer organisations felt that consumers would benefit from harmonised, mandatory systems. Industry organisations are generally in favour of voluntary systems, primarily due to the costs that they expect would be the result of any mandatory system. For the member states (MS), any mandatory labelling system would increase requirements for market surveillance.

Care labelling

There is currently no mandatory care labelling regime at the EU level. The situation at MS level is mixed, with the majority of MS (about two thirds, including most of EU-15) having voluntary regimes while the rest (including many new member states) have mandatory regimes referring to the ISO 3758 standard, which again is based on the care symbols developed and owned by the industry association GINETEX.

Consumer organisations are in favour of a harmonised (mandatory) regime because consumers can then be certain to meet the same symbols in the entire EU and would thus be more certain that they select the appropriate way of caring for their garment. Industry and standardisation bodies oppose a mandatory regime because the current (mainly voluntary) regime is seen as working well, and because of the anticipated increased costs associated with a mandatory regime.

Chemical substances in textiles

Currently, the use of chemical substances is regulated through the REACH Regulation (EC 1907/2006). However, consumer organisations feel strongly that the area of chemical substances in textiles is not sufficiently addressed in the current legislation. Their two main concerns are that nano-technologies are not covered by REACH (and its health effects are still not well-documented), and the level of chemical substances still found in some textiles. Labelling is required but not seen as sufficient by consumer organisations. The costs for industry with respect to chemical labelling are mainly related to additional tests for chemical substances. Industry is not in favour of labelling, as they think that REACH covers chemical substances sufficiently and that the issue is a question of compliance which should be checked by the market surveillance authorities. Also, they do not think that labelling will add real value for the consumer.

Electronic labelling

Electronic labelling refers to the use of Radio Frequency Identification (RFID) for storing information on a garment electronically in a label. Recent research shows that the retail sector benefits the most from RFID technology, particularly in inventory management. The benefits of RFID for consumers are still in the infancy stage. The main problematic issue related to consumer's use of RFID is the issue of privacy, meaning that consumer organisations fear that it will be possible for industry to track consumer's purchases.

Multi-lingual labelling

MS may require the national language to be used for the labelling and marking of textile products in their territory. In general, there are few complaints filed by consumers on the current system of multi-lingual textile labelling. The consumer organisations would prefer mandatory multi-lingual requirements at EU level for all types of labels but acknowledge that for the most part consumers do not seem too affected by the current system. The costs for industry are mostly associated with relabelling. Industry organisations are satisfied with the current system and oppose a mandatory system mainly because the labels would have to be very big to accommodate the many languages.

Country of origin labelling

Country of origin labelling has already been the subject of significant debate since it was covered in a Commission Regulation proposal from 2005 which has been blocked in the Council. The benefits for consumers are limited to "better information" as country of origin marking has no impact on the health or safety of consumers. Also, defining the country of origin can be difficult and may provide little useful information to the consumer. For industry, benefits are (marginally) increased competitiveness for EU producers in the Single Market. However, industry and member states attitudes towards country of origin labelling are split according to the competitive position of companies and location of their production chain. On the cost side, the price of imported garments may increase as a result of increased costs of labelling, monitoring of the production chain, and administrative and control burdens related to documentation and customs handling, which may negatively affect the competitiveness of importers (wholesalers and retailers) vis-a-vis European manufacturers.

Ecological labelling

Existing voluntary European ecological labelling include the European Ecolabel and the German Öko-tex. Consumer organisations believe that consumers are increasingly interested in the area. Costs involved in getting an ecological label are relatively significant, and consumer demand for ecological labelling will thus have to grow stronger before industry can see the benefits of investing in it.

Size labelling

Harmonisation of the size system is covered by a European voluntary standard EN13402 on size designation of clothes. Nevertheless, a range of different size labelling systems exist. Consumer organisations are not very concerned about the issue, but still prefer a harmonised system. Industry believes that in order to reach consensus on size labelling a legislative system is needed and the majority of industry organisations are in favour of such a system, despite their perception that it would impose large costs on industry. However, it may be difficult to reach consensus on which system should be used.

1. INTRODUCTION

The starting point for this study is the recent proposal for a regulation on textile names and related labelling of textile products (COM/2009/0031), which the Commission adopted on 30 January 2009. The proposal seeks to simplify the existing regulatory environment in order to allow fibre manufacturers, fibre users and consumers to benefit faster from novel fibres. The proposed regulation does not extend the scope of the current regulatory framework to other requirements beyond fibre composition and the harmonisation of textile names.

Spurred by the debate following the above proposal, the IMCO Committee wishes to investigate if there are other textile labelling requirements that could be brought up in EU legislation. The present study will therefore examine whether existing EU legislation on textile labelling could include other labelling requirements so as to provide consumers with more accurate and complete information about the properties of, and substances used in, textile products. **The study does not propose to amend the above-mentioned proposal, but merely looks at ways in which the textile labelling regime could be improved.** The utility of this study thus goes beyond the current proposal since it could also serve as a basis for future legislative initiatives. This is welcomed by the European Commission services and some industry organisations¹, which all state that the priority at this stage is to revise the regulation on names and related labelling of textile products, as the current legislation is much too complex in terms of including new names on the harmonised list of textile fibres. At the same time, they are willing to discuss if new textile labelling could be beneficial, although not as an amendment to the proposal on fibre labelling.

1.1. Objective of the study

The objective of the study is to give a balanced view of the impact on consumers and industry if the labelling requirements presented in this study were to be introduced. The study in particular will look at consumer views, legal and administrative challenges as well as implications/impacts for industry. The study will critically assess the benefits/positive impacts as well as the negative impacts of the labelling requirements included in this study, which may be both quantitative and qualitative depending on the types of data which can be collected within the framework of this study.

The labelling requirements that will be looked into in the present study are as follows (decreasing order of focus):

1. Care labelling
2. Use of, and indication of, chemical substances in textiles
3. Electronic labelling
4. Multi-lingual labelling
5. Country of origin
6. Ecological labelling

¹ CIRFS and Euratex

1.2. Structure of this study

The study is structured as follows: After the executive summary and the introduction in Chapter 1, Chapter 2 describes the impacts on consumers and the costs for industry of care labelling. Chapter 3 deals with chemical substances in textiles, while Chapter 4 concerns electronic labelling. Chapter 5 is on multi-lingual labelling, while Chapters 6 and 7, respectively, deal with country of origin labelling and ecological labelling. Chapter 8 concerns size labelling while Chapter 9 concludes.

2. CARE LABELLING

2.1. The current situation

There is no mandatory care labelling regime at the EU level. At Member State level, the situation varies. In most of the older Member States (EU-15 except Austria and Finland) and in Slovenia, Lithuania, Malta, and Cyprus, care labelling is voluntary, whereas many of the new Member States have mandatory care labelling requirements (Bulgaria, Czech Republic, Estonia, Hungary, Latvia, Poland, Romania)². Some Member States have however recently repealed those requirements from their legislation, while some others are in the process of doing so.

Both the voluntary care labelling systems applied by manufacturers and importers, and the legal requirements in the Member States where care labelling is mandatory, are generally based on the ISO 3758 standard, which again is based on the care symbols developed by GINETEX, the International Association for Textile Care Labelling. The symbols are protected by a trademark owned by GINETEX. In 1990, GINETEX allowed ISO to incorporate the symbols into the ISO 3758 standard³. The ISO 3758 in turn was adopted by CEN as a European standard ISO EN 3758⁴.

This means that in practice, there is only one system in Europe, namely the GINETEX system/ISO 3758 standard⁵.

There are 2001 and 2005 editions of the standards and there is currently a new development in ISO bringing in additional symbols relating primarily to drying symbols. With this development, the ISO standards will be more comprehensive than ever regarding the number of symbols used on garments⁶.

2.2. Care labelling systems in countries outside the EU

2.2.1. Mandatory care labelling systems

Several of the main EU trade partners have mandatory care labelling systems, including the US, Japan, Australia, and China.

The US has had care labelling legislation since 1971. The legislation has seen several amendments since then, with the current mandatory care labelling system in place since 2000. The Federal Trade Commission (FTC) is the legal body in charge of enforcing it. The American care labels can be composed of either words or symbols, although words tend to be most commonly used. As a minimum, they must include and be listed in the order of washing, bleaching, drying, ironing and dry cleaning instructions. Additional instructions can be provided for clarification purposes. In addition, the FTC requires that the care label is easily visible at the point of sale, remains permanently attached for the life of the garment, provides care instructions for ordinary use of the garment, and warns against harsh treatments of the garment.

² Euratex (2007) : Revised- Textile and Clothing Labelling- World Countries and Territories

³ GINETEX (2009): GINETEX FAQ

⁴ Interviews with AEDT, CEN and GINETEX

⁵ Interview with GINETEX

⁶ ISO (2005): International Standard 3758 -Textiles – care labelling code using symbols

The care labelling system in Japan is similar to that used in the US. The symbols used are different, but they must also be in a certain order. That order is washing, bleaching, ironing, dry cleaning, wringing and drying⁷.

In March 2009, a revised care labelling standard took effect in China. The new standard brings care labelling instructions in alignment with the international care label standard ISO 3758. The major changes necessary for this alignment were the sequence and shapes of symbols, as well as the introduction of additional symbols⁸.

The Australian system was established in 1998. It uses specific words, in English, to describe the necessary care instructions. The order in which the words must appear must refer to washing, agitation, drying, bleaching, and ironing⁹. These instructions can be specific as well as prohibitive, such as 'dry flat' or 'do not tumble dry', respectively¹⁰.

2.2.2. Voluntary care labelling system

In Canada, there is a voluntary care labelling system provided through a standard by the Canadian General Standards Board. Although this system is voluntary, it can be seen on almost all garments sold in Canada, and there are requirements that it must be used correctly.

In 2006, a study was done to see how well consumers understood the changes in the standard adopted in 2003, which made it more aligned with US and international care labelling standards.

The study found that 67% of the respondents used care label information when purchasing garments and 82% of the respondents used care label information when caring for the garments. For the most part, the respondents learned about the care labelling system through Home Economics classes, magazines, their mothers, etc. When asked about the new changes, most were unaware that the system had changed, and found the new system too complicated. They then suggested the new system be promoted through schools, retailers, magazines, and an explanation on washers and dryers. Furthermore, they felt the system should be made mandatory so they only had to learn one care labelling system. These are lessons that should be considered when looking into a mandatory EU-level care labelling system¹¹.

2.2.3. Consumer benefits from mandatory care labelling

In Australia, an impact assessment was performed before the new care labelling standard was adopted. This impact assessment discussed the benefits to consumers which a mandatory care labelling system brings. The main benefit is that consumers will be aware of the method and potential cost of caring for products at the point of sale. This is especially important since there is an increasing range of natural and synthetic fibres being used, making it difficult for consumers to assess on their own how best to care for the garment. Also, consumers are able to confidently select correct care treatments, thereby prolonging the useful life of the garment and ensuring that the garment is not damaged by improper care. This has the additional benefit of decreasing claims processing and litigation costs¹².

⁷ Intertek (2009): Care Labelling

⁸ Safeguards (2009): China Revises the Textile Care Labelling System to Use Updated Symbols

⁹ Intertek (2009): Care Labelling

¹⁰ ACCC (2007): Product Safety- A Mandatory Standards Guide

¹¹ Feltham & Martin (2006): Apparel Care Labels: Understanding Consumers' Use of Information

¹² ACCC (1998) : Care Labelling of Clothing and Textile Products Regulation Impact Assessment

In the US, there was a study done on the consumer perspective of garment care in 2000, around the time when the last amendment to textile care labelling instructions was implemented. The study found that over 50% of American respondents checked the care label before buying a garment, and around 46% said they would avoid a garment purchase due to its laundering instructions. Younger respondents were found to be less concerned with care labelling instructions when purchasing a garment. Overall, the study suggested that the role of textile care labelling would become more important due to changing consumer lifestyles. This was because the preference for comfort was becoming more prominent, thereby leading to an increase in garments laundered at home.

An additional factor that must be considered is how consumers use care labels. In the study mentioned above, 56% of respondents said they professionally cleaned garments even when the label said it could be machine-washed, and 35% said they machine-washed a garment when it was labelled to be professionally cleaned¹³. In a more recent study from 2006, consumer laundering practices were looked further into. In that study, 67% of respondents said they read care instructions before laundering. However, they also relied (70%) on trial and error, such as techniques they learned from their mothers. Furthermore, this was compounded due to the lack of standard practices for pre-treating stains, selecting detergents, loading washing machines, etc. Even when specific water temperatures are listed on care labels, 41% of respondents stated they rarely changed the temperature. This means that consumers often rely on interpretation and habit, leading to inconsistent garment care practices¹⁴. These factors must be considered when considering mandatory care labelling systems.

2.3. Impacts on consumers

In general, the consumer organisations are not very concerned about care labelling. Neither BEUC nor ANEC, the two large European consumer organisations, follow this area at the moment. However, BEUC referred to especially four national organisations that would likely have an opinion about care labelling. Three of these¹⁵ agreed to be interviewed for this study. These national consumer organisations felt strongly that care labelling should be harmonised across Europe, as it is in the interest of consumers to always meet the same symbols when shopping across borders¹⁶. Another reason stated for preferring a mandatory regime is that consumers would then be more certain that they select the appropriate way of caring for their garment. The drawback of a voluntary system is also that companies are, obviously, free to decide whether they will use it, meaning that the consumers cannot be absolutely certain to meet the same system across the EU.

Finally, according to one of the interviewed consumer organisations, a mandatory system could decrease the costs associated with filing complaints against for instance manufacturers or dry cleaning shops¹⁷. If care labelling is mandatory, dry cleaning shops cannot claim that it was not clearly outlined how the textile should be treated, and manufacturers, being required to supply the relevant information, can more easily be held responsible if the information is not correct. The BEUC member organisations who have responded to a request from BEUC on their opinion on textile labelling state that consumer complaints in relation to textiles mainly concern problems that have arisen after washing textiles, such as shrinkage, colour degradation and the like¹⁸.

¹³ Cotton Incorporated, Textile Consumer (2000) : The Role of Garment Care : The Consumers' Perspective

¹⁴ Cotton Incorporated (2007): Understanding Consumers' Expectations about Laundering

¹⁵ VZBV (Germany), KEPKA (Greece) and Test-Achats (Belgium)

¹⁶ Interviews with KEPKA and VZBV and written answers from Test-Achats

¹⁷ Written answers from Test-Achats

¹⁸ BEUC (2009) : New regulation on textile labelling: Answers received from some of the BEUC member organisations

The study on the voluntary system in Canada found that the Canadian consumers preferred a mandatory system, since they would then only have to learn one system. However, in the EU, the Ginetex system is dominant and the European consumers thus already only have one system to familiarize themselves with. Thus, the added value of this for European consumers seems to be limited.

The same argument could be put forward as regards the other reasons stated above for preferring a mandatory system. As the GINETEX symbols are already used as a basis for the ISO standards which are widely applied across Europe and which serve as the basis both for the voluntary systems and mandatory systems in individual member states, the consumer organisations' demand for a uniform system seems to a large extent already to be met. However, a mandatory system would help address the cases in which the standardised information is not supplied. It could also be argued that if all MS are already applying the system (either in practice or through regulation), it might as well be made mandatory in order to increase consumer confidence. Industry's views on this will be discussed later in this chapter.

The consumer organisations having an opinion on care labelling agree that symbols is the best way of presenting care labelling to consumers and that they are sufficient for the consumers. According to the consumer organisations, the symbols are well understood. One consumer organisation however points out that the symbols for dry cleaning may be less well-known by the consumers than for instance the symbols for ironing¹⁹, and it may be relevant here to educate consumers in order to ensure that they understand the symbols properly. In the US, such education has been carried out through national campaigns. For example, in July 1997, when manufacturers were first allowed to use symbols in care label instructions, the Federal Trade Commission (FTC) started Project CLEAN (Care Labelling Education and Awareness Network) to promote to consumers what the symbols meant and how they should be used to safely launder garments. Industry organisations, such as Clorox and Proctor & Gamble, also joined in to educate consumers. In addition, the symbols and written instructions were required to be used simultaneously for the first eighteen months until consumers got to know the meaning of the symbols²⁰. Some of these lessons learned could be used in the EU as well, if care labelling was to be promoted.

With respect to multi-lingual labelling, one of the consumer organisations feel that they might confuse the consumers more than help them, as it is very hard to get a good overview of how to properly care for a product if it is stated in many languages²¹. Another consumer organisation, however, believes that consumers are entitled to have the care labelling instructions in their own language and will not accept it if the care labelling is only written on the label in 2-3 languages²². The disagreement may be another reason for keeping the care labelling based on symbols only.

A memo from some of BEUC's member organisations²³ states that the list in Annex V of the Commission's proposal for a regulation on textile names and related labelling of textile products²⁴ (exceptions to which labelling is not required) is too long, and that at least textiles intended to be used by consumers for their personal use, such as gaiters, felt hats, oven gloves and clothes, protective requisites for sports, and textile products for protection and safety, should be labelled like clothes. The interviewed consumer organisations that had an opinion on this supported this statement.

¹⁹ Interviews with KEPKA

²⁰ Federal Trade Commission (1997): FTC Issues a Laundry List of Care Label Symbol Partnerships

²¹ Written answers from Test-Achats

²² Interview with KEPKA

²³ BEUC (2009): New regulation on textile labelling: Answers received from some of the BEUC member organisations

²⁴ Proposal for a Regulation of the European Parliament and of the Council on textile names and related labelling of textile products (COM/2009/0031 final/2 - COD 2009/0006)

Summing up, it seems that the current GINETEX/ISO care labelling system which is applied across Europe is useful and poses few problems to consumers. The consumer organisations would like to see the system made mandatory as this would increase consumer confidence by ensuring that consumers are always met with the same symbols across Europe.

2.4. Impacts on industry

The industry organisations, from the fibre producers to the retailers and the standardisation bodies, generally agree that the current system based on the GINETEX symbols is satisfactory and stress that a system based on those symbols is already used voluntarily and is well-known in virtually all MS²⁵. None of the interviewed industry organisations are in favour of a mandatory system for care labelling. The main arguments put forward against a mandatory system are the costs, the risk of “under-labelling²⁶” (both of which will be discussed in a separate section below) and the fact that the voluntary system based on GINETEX symbols is working fine as it is. In other words, the industry prefers to maintain status quo.

As stated in chapter 2.2, some of EU's major trade partners, including the US, Japan, and China, have introduced mandatory care labelling systems. This means that the EU manufacturers exporting to these countries have to comply with legal requirements while this is not the case the other way around (at least for the Member States where care labelling is voluntary). Initially, introducing a mandatory scheme in the EU could therefore help ensuring more fair competition between EU and non-EU manufacturers as they would be subject to similar conditions.

However, in practice, the GINETEX system is already widely applied²⁷ by non-EU manufacturers when exporting to the EU. There is of course a risk associated with the fact that they are not obliged to do so, and may suddenly choose to abandon this practise, which could be problematic for European consumers as they would then have to familiarise themselves with for instance a Japanese or a US labelling system. Introducing a mandatory scheme in the EU would effectively prevent this situation from happening. It is however difficult to foresee what would make the non-EU manufacturers abandon their current practise.

2.4.1. Legal implications of introducing a mandatory scheme

The main legal implications of introducing a mandatory scheme are related to the fact that the symbols' trademarks belong to GINETEX. GINETEX' current position is that anyone using those symbols needs the permission of GINETEX or a GINETEX representative, as GINETEX and its members are financed by selling the rights to use the pictograms. As mentioned above, GINETEX has given permission to incorporate their symbols into the ISO standard, but still owns the trademark (the pictograms). The national GINETEX committees in GINETEX member countries can grant companies the right to use the symbols under sub-licence or give their members a general authorisation. The national committees autonomously control the implementation and application of care labelling in their country, and the cost (fee) differs from country to country.

This means that introducing a mandatory scheme based on the GINETEX symbols (which are the de facto standard now and thus the most obvious choice for a new mandatory standard), would require the trademark issue being resolved. In effect, such a mandatory scheme would oblige industry to pay license fees to GINETEX, a private organisation, in order to live up to the requirements of the legislation.

²⁵ E.g. interview with AEDT, interview with Euratex

²⁶ The term refers to labelling care instructions below what is theoretically possible (or even desirable, in terms of adequate care for the textile). An example of under-labelling is a shirt which could be washed at 60 degrees but the label says that it should be washed at 30 degrees, in order for the producer to avoid commercial problems.

²⁷ E.g. <http://www.infomat.com/research/infre0000331.html>

Although this would mean higher income from fees, GINETEX, as an industry organisation, is opposed to a mandatory care labelling system mainly due to the associated costs imposed on industry²⁸.

Another legal implication of introducing a mandatory scheme is that the economic operators may be held liable if they do not provide the consumers with correct care instructions. It may be easier for consumers to do so as the consumers can be certain that there is a "written proof" of the correct care labelling.

2.4.2. Implications for Member States

If care labelling is made mandatory, the Member States will be required to monitor labelling. This may require new tools and extra resources for the Market Surveillance Authorities (MSA) in the Member States²⁹. A previous study by Ramboll Management Consulting³⁰ showed that the MSA generally feel that they need more funds to carry out their existing responsibilities, and it might not be welcomed by the MSA that they need to carry out even more tasks.

2.4.3. Associated costs

All interviewed industry organisations and standardisation bodies agree that making care labelling mandatory will increase costs. According to the industry organisations and standardisation bodies, costs will especially increase within the areas of additional testing and under-labelling.

In terms of additional testing, it is expected that the textile would have to be tested for shrinkage, stability and colour fastness. In order for care labels to have meaning, they need to be tested, and this is something the vast majority of major suppliers and retailers already do³¹ (no exact figures could be found on how big a share of products are currently being tested). However, at least some of the tests will most likely be carried out anyway.

Industry however fears that if care labelling becomes compulsory, a tendency could emerge where producers are being asked by retailers to carry out even more tests than they already do, as retailers would want to be absolutely certain that the textiles they sell are compliant with legislation³². If the textile producers are SMEs, it would be very costly for them to test products, and the question is whether they would be able to afford additional testing³³.

Industry organisations also link extra costs to the issue of under-labelling. However, these extra costs are mainly borne by the consumers due to unnecessary and costly treatment (dry cleaning). If producers are being too careful with the care labelling due to fear that they will be more likely, with mandatory labelling, to be held liable for damages or wear to textiles resulting from e.g. washing, consumers could be advised to undertake particular forms of cleaning that are more expensive than necessary given the composition of the product and how it could be cared for, meaning that the labelling would not fully show the real performance of the product. For instance, a textile may be washed at 60 degrees, but the manufacturers might put maximum 30 degrees on the label in order to be sure that they are in compliance with the tests³⁴.

²⁸ Interview with GINETEX

²⁹ Interview with DG ENTR

³⁰ <http://www.europarl.europa.eu/activities/committees/studies/searchPerform.do?page=3&language=EN>

³¹ Interview with GINETEX

³² Interview with Euratex

³³ Interview with Euratex

³⁴ Interview with CEN, CIRFS and Euratex

Summary of conclusions

In the area of care labelling, the large European consumer organisations are not following the area closely, which indicates that care labelling is not their main priority. Reasons include the fact that missing or improper care labelling does not present a risk to consumers' health. However, the consumer organisations having an opinion on care labelling agree that consumers would benefit from a mandatory regime as this would increase consumer confidence and help them to file complaints against manufacturers or dry cleaning shops. The drawback of a voluntary system is also that companies are free to decide whether they will use it, meaning that the consumers cannot be absolutely certain to always meet the same system across the EU.

The main costs associated with mandatory care labelling are for industry the costs of additional testing mainly due to pressure from retailers, while for MS it is the additional market surveillance which needs to be undertaken. The industry organisations (producers and retailers) as well as standardisation bodies are all against a mandatory regime, both because the current voluntary regime, where Ginetex symbols are used as a basis for the ISO standard which is applied across Europe, works well, and because of the associated costs.

3. CHEMICAL SUBSTANCES IN TEXTILES

3.1. The current situation

At the moment, there are no requirements for labelling in relation to chemical substances in textiles. The REACH Regulation (EC 1907/2006) is the legislation currently monitoring the use of chemical substances. It deals with the **R**egistration, **E**valuation, **A**uthorisation and **R**estriction of **C**hemical substances, and entered into force on 1 June 2007. The aim of REACH is to improve the protection of human health and the environment through better and earlier identification of the intrinsic properties of chemical substances. At the same time, innovative capability and competitiveness of the EU chemicals industry should be enhanced.

However, a Commission Proposal has recently been put forward for a Regulation concerning the placing on the market and use of biocidal products³⁵. One of the main elements of this proposal (article 47) is that articles treated with biocides shall be clearly labelled with, inter alia, the name of active substances used to treat the material, their authorisation number, and any hazard statement or precautionary statement set out in the authorisation for the biocidal product. The biocidal products referred to in relation to textiles are specifically products used for the preservation of fibrous or polymerised materials, including textile products, by the control of microbiological deterioration.

3.2. Consumers

The area of chemical substances is an area of great concern to all the consumer organisations that have been interviewed. Especially nano-technologies is an area that is worrying the consumer organisations, as the amount of chemicals, nano-technologies and nanomaterials in for instance textiles are a question of safety, not only a question of quality³⁶.

ANEC and BEUC do not believe that the REACH Regulation sufficiently addresses the area of nano-technologies³⁷. In a joint position paper on nano-technologies by ANEC and BEUC, the consumer organisations also call for clear definitions on nano-technologies and that research towards safety, health and environmental risks of nanomaterials, which could then be used for risk assessment procedures, is prioritised by the Commission³⁸.

The consumer organisations generally think that labels can be useful for informing the customers on chemical substances in textiles, but that it is not in itself sufficient to address health concerns³⁹. Consumers have the right to be informed about the content of a textile product and could be so via labels. It is however important to highlight that labelling is just for informing the consumers. The labels do not mean that consumers should or could be able to evaluate the risk of substances or make a safety assessment based on labels. Labelling requirements for products should therefore not be considered sufficient or be regarded as an acceptable substitute for more far-reaching measures such as obligatory pre-market safety assessment systems⁴⁰.

³⁵ Proposal for a Regulation of the European Parliament and of the Council concerning the placing on the market and use of biocidal products, COM(2009) 267 final, 12 June 2009

³⁶ Interview with ANEC

³⁷ Interview with ANEC and ANEC/BEUC (2009): Nano-technology: Small is beautiful but is it safe?

³⁸ ANEC/BEUC (2009): Nano-technology: Small is beautiful but is it safe?

³⁹ Interview with ANEC, written answers from Test-Achats

⁴⁰ Interview with ANEC, written answers from Test-Achats

Another aspect of labelling is the question of ensuring consistency throughout the production chain. Some substances may be used in one part of the production chain and other substances may be used in another. This is especially true for textiles, where the fabric is often produced in one country, the yarn in another, and the product is assembled in a third country. The ability to trust all parts of the production chain is really an issue.

Two of the consumer organisations however feel that there should be more labelling of how the textile (both clothes and furniture etc.) has been treated. Currently labelling is only about fibre, and there is no information on the chemical colour used or the dyeing process (cf. however the above-mentioned proposal for a regulation concerning biocides). Allergic or irritant reactions to clothing can be a result of rubber materials, formaldehyde finishing resins, chemical additives, dyes, glues and tanning agents used in processing the fabric or clothing or metallic fasteners.⁴¹ For instance, chemicals used in textile finishes have been shown to elicit contact dermatitis (swelling, hives), with formaldehyde in particular being the eliciting agent⁴². There are also other concerns in addition to allergies. For instance, sportswear, shoes, sponges and dishcloths are sometimes given an antibacterial treatment. The increasing use of various antibacterial agents may, in the longer term, lead to adverse effects as useful bacteria disappear and more resistant bacterial strains arise. In the worst case this may lead to diseases that are difficult to treat⁴³. Finally, as mentioned above, consumer organisations are concerned that the use of nano-technologies may have health effects which are not yet fully known.

3.2.1. Measures to address health concerns other than labelling

Three consumer organisations call for better regulation on chemical substances. On nano-technologies, the joint position paper by ANEC and BEUC states that the REACH Regulation is currently not providing a proper frame for the registration and assessment of nano-technologies⁴⁴. Another consumer organisation is not satisfied with the REACH Regulation either and states that dangerous substances used in textiles should be more strictly regulated⁴⁵. The consumer organisation Test-Achats is involved in testing products and state that it has found that textile products sometimes have unacceptable amounts of dangerous substances (for instance in decorations used on clothes). Therefore, in addition to labelling, Test-Achats feels that a specific regulation limiting the use of phthalates, formaldehyde, heavy metals and products for colouring textiles should be introduced, as these are widely used in the textile industry and pose health risks as described above⁴⁶.

Other relevant measures include market safety assessments (assessments of the substances used in textiles), post-market surveillance, and testing. It is ANEC's opinion that not enough market surveillance is being undertaken regarding chemicals in shoes and chemicals in furniture such as sofas⁴⁷. Also, more studies could be undertaken to properly understand the harm a certain chemical can cause⁴⁸. For instance, according to ANEC currently there is no scientific information on the effects of migration from nanomaterials and nanoparticles through skin into larger organs. In ANEC's opinion, a precautionary principle should then apply, meaning that until it is proven that the chemical is not harmful then it should be prohibited to use it.

⁴¹ Washington State Department (2001): Clothing Dermatitis and Clothing-related Skin Conditions

⁴² Bircher (2003): Cutaneous Immediate-Type Reactions to Textiles

⁴³ KEMI Swedish Chemicals Agency (2009) : Chemicals in textiles : Practical advice for companies in the sector,

⁴⁴ ANEC/BEUC (2009): Nano-technology: Small is beautiful but is it safe?

⁴⁵ Written answers from Test-Achats

⁴⁶ Written answers from Test-Achats and Test-Achats (2009): "Produits Chimiques dangereux dans des pyjamas pour infants"

⁴⁷ Interview with ANEC

⁴⁸ Interview with KEPKA

A specialised website could also be a means to communicate official health concerns to consumers, as long as it is not used to transfer the responsibility of evaluating the risks of substances posing potential risks for health to consumers.⁴⁹ Serial numbers may be used to identify the textile⁵⁰. The security of such a website would need to be very high in order to minimise risks that it is hacked, and would have to be neutral. A website managed by the European Commission website could be a solution, as it is important that it is a host that can be trusted and that companies cannot interfere with⁵¹.

However, the consumer organisations stress that such a website should only be seen as additional information. Not all consumers have access to the Internet, and most often, there is not access to the Internet in the store where consumers buy the textiles⁵². However, such a website could be a good supplement to inform consumers through.

3.3. Industry

All interviewed industry organisations believe that the REACH legislation sufficiently addresses the issue of chemical ingredients in textiles. In addition, there exists a legislation which bans certain azo-dyes⁵³ that industry is also complying with⁵⁴. The REACH Regulation aim is to improve the protection of human health in the environment. Chemicals identified as harmful under the REACH regulation means that that these chemicals cannot be used or should only be used in miniscule quantities. From manufacturer to retailer, industry tests its products to be sure the chemicals are not present. The European textile industry is closely following the legislation on the control of chemical use. REACH is gradually introducing tighter controls in consumer products, including textiles, and there are currently strong compliance requirements⁵⁵.

The industry organisations also do not believe that labelling will add value for the consumers⁵⁶. According to the industry organisations, all respectable companies are complying with legislation and no respectable producer will knowingly use dye, chemicals, etc that are not supposed to be in the garment and that will likely cause allergies⁵⁷. Also, if producers do not comply with legislation they would not write that on the label either. Compliance problems will not be solved by adding a label to the textile.

Therefore, industry feels that it is rather a question of monitoring compliance – the legislation is strong enough as it is.

Proper control through random tests at borders/proper education of importers might help solve the issue of compliance. Better control of certain third countries through the use of more and better focused customs risk assessment methods could beneficially be implemented through the national market surveillance systems⁵⁸. This is however again a question of whether the market surveillance authorities will have sufficient funding to carry out these tasks. The market surveillance authorities have the obligation to carry out regular visits to producers and do carry out random tests to see whether the products on the market are in compliance with the law⁵⁹. However, expanding the market surveillance authorities' responsibilities may not be feasible in all MS at the moment.

⁴⁹ Written answers from Test-Achats

⁵⁰ Interviews with VZBV and ANEC

⁵¹ Interview with ANEC

⁵² Interviews with ANEC and the European Consumer Centre Austria

⁵³ Directive 2002/61/EC of July 2002 amending for the nineteenth time Council Directive 76/769/EEC relating to restrictions on the marketing and use of certain dangerous substances and preparations (azocolourants)

⁵⁴ Interview with Euratex

⁵⁵ Interviews with CEN, AEDT, CIRFS, Euratex, Ginetex

⁵⁶ Interviews with CEN, AEDT, CIRFS, Euratex, Ginetex

⁵⁷ Interview with CIRFS

⁵⁸ Interview with Euratex

⁵⁹ Interview with DG ENTR

3.3.1. Associated costs

The industry organisations especially highlight the costs of testing all products for chemical substances as the main additional cost of labelling. The costs of testing textile products for chemical substances through randomly selected samples are already quite high⁶⁰. If all products should be tested for chemical substances it would therefore add greatly to the costs. According to the independent test laboratory DEKRA, a typical test for chemical substances would include the following:

The laboratory would typically test for the content of azodyes, if allergic reactions emerge when the textile is in skin contact, if the textile contains dispersed dyes, and if it is a non-natural textile it is also tested for phthalates. The cost of such a test ranges between 100 Euro and 500 Euro per textile material.

In a typical textile product (for instance a bag, a sofa or a shirt), there is often more than one kind of textile. If all textiles were to be tested individually, it would be very expensive, so the normal procedure is therefore to test a mixed sample. The cost for a mixed sample is normally between 500 Euro and 2000 Euro for the complete product.

If a chemical labelling requirement is introduced, industry fears that the testing costs will increase as they may need to test every garment in order to comply with the labelling, rather than the random tests they carry out today where approximately 1 out of 100 pieces is controlled⁶¹. Today, textile products are tested by laboratories to identify the presence of chemicals, but only through random samples. If a mandatory chemical labelling requirement was to be introduced, industry would as mentioned need to test all their products to ensure that they all comply with what is written in the label. Industry will not be able to afford one product that does not live entirely up to standard if it has a label in it stating that it does not contain certain chemicals. Some industry organisations state that this extra cost will be passed on to consumers⁶². The costs however depend on what kinds of substances would need to be tested and consequently which tests are needed⁶³.

Industry will however always have to live up to legislation, and a solution to the additional testing costs could be to emphasise that random tests (which are being carried out today) suffice. For consumer organisations, the main issue here is to inform the customers what chemicals the garments contain, so that the customers can make an informed choice.

⁶⁰ E.g. interviews with Ginetex, CIRFS, AEDT

⁶¹ Interview with Ginetex

⁶² Interviews with Ginetex and AEDT

⁶³ Interview with Euratex

Summary of conclusions

Consumer organisations state that the benefits of labelling for consumers are that they have a right to know the level of chemical substances in textiles. Consumer organisations however also believe that labelling is not sufficient, and that new legislation will need to be introduced. Labelling can be used to inform the consumers, but does not necessarily enable them to make decisions on health risks.

The costs for industry related to chemical labelling will mainly be on additional tests for chemical substances, as industry fears that all products will need to be tested as opposed to the random tests carried out today.

Industry is not in favour of labelling because 1) they consider that the REACH Regulation covers chemical substances sufficiently and that it is more a question of compliance which should be checked by the market surveillance authorities, and 2) they cannot see what should be put on the label as responsible producers would comply with regulation and thus not put harmful substances in their product, while any producers that do not comply with legislation are not likely to declare this on a label.

If legislation is not sufficient, then it would need to be strengthened and compliance will have to be monitored more closely. The consumer organisations feel strongly that this is an area that is not sufficiently addressed in the current legislation, and a study could possibly be undertaken in order to determine whether new legislation is needed.

4. ELECTRONIC LABELLING – RFID IN TEXTILES

Radio Frequency IDentification (RFID) is the use of an object (typically referred to as an RFID tag or chip) applied to or incorporated into a product for the purpose of identification and tracking using radio waves. Electronic labelling refers to the use of RFID for storing information on a garment electronically in a label.

A recent project (BRIDGE) funded under the 6th framework programme for research and development (FP6) has looked into several areas where RFID could be developed and implemented. The textile sector was one of those areas. The project will be described briefly before moving on to discussing the impacts of electronic labelling on consumers and industry.

4.1. The BRIDGE project

The BRIDGE project was a 3-year FP6 project which began in 2006. Textiles were one area of the project which applied RFID in pilot projects and experience in real-life environment, as well as developed a business case for RFID.

In order to receive representative results, three different business models were used for the pilot projects: a department store, a hypermarket, and an SME supplier. Retail was found to benefit the most from RFID technology, particularly in inventory management. For example, at the pilot in one store, the speed of counting goods was increased by 20 times and there was a reading rate of nearly 99%⁶⁴. Other benefits that especially retailers in general are expected to receive from RFID implementation include goods traceability, quality assurance, quality control, warehouse flow optimality, and theft prevention.

The BRIDGE project has been highlighted here as it has tested the most promising ways of introducing RFID in the textile sector: to manage the supply chain and to some extent to improve the information to consumers and the shopping experience.

4.2. Impacts on consumers

RFID in textiles may be expected to impact consumers by giving them more information about the garment in a RFID chip, thus increasing consumer information, in particular at the point of sale. The BRIDGE project has in its department store segment focused on gathering customer attitudes toward RFID. For example, smart shelves, smart dressing rooms and a smart mirror were installed. These had the ability to read the RFID tag and give additional information to the consumer, such as different sizes, colours, and types. Based on a customer survey, 56% said the intelligent shelf gave added value, 49% found the intelligent dressing room informative, and 33% felt the intelligent mirror was useful⁶⁵.

The consumer organisations, however, did not fully agree with the positive results from the BRIDGE consumer survey.

The main concern of consumer organisations with respect to electronic labelling involves privacy issues. More specifically, they worry that the chip could be used to “spy” on consumers, to track and profile consumers, for consumer discrimination, to violate their security (ID theft), to go against ethics, etc⁶⁶. Two consumer organisations⁶⁷ therefore suggest that the RFID chip should be detached when the consumer leaves the store as a default action, and not only if the customer specifically asks for it.

⁶⁴ BRIDGE (2009) : Final Report

⁶⁵ Interview with BRIDGE project manager and BRIDGE (2008): Kaufhof Store Customer Satisfaction Results

⁶⁶ Interview with KEPKA, interview with ANEC, written answer from Test-Achats

⁶⁷ KEPKA and ANEC

The reason for this is mainly a wish to ensure that RFID is not used as means of targeted marketing, and one organisation⁶⁸ was also afraid that if the RFID chips were left in the garment, it may expose the customers to health risks through too much additional exposure to radiation, a concern that was also voiced by one of the industry organisations⁶⁹.

It was also mentioned that the privacy issue should be focused on and potentially solved, especially if information that consumers will eventually need, such as washing instructions, are included in the RFID tag as well. Due to privacy concerns, it may not be possible to include all information about the garment in the same tag⁷⁰, because if the tag is removed at the shop then care instructions will have to be included in another label.

The BRIDGE project's privacy policy attempted to address this concern by stating that industry must agree to communicate to consumers whether a garment has an RFID chip, and assure that no personal data will be stored on the electronic tag⁷¹. However, according to the above discussion, some consumer organisations might not be satisfied with such a solution, and further discussions between industry and consumer organisations should take place before RFID chips are systematically added to textiles.

If RFID tags are left in the garment, some consumer organisations were concerned with how the consumers would read the information stored in the RFID tag. For instance, would they need to invest in a reader machine at home? Could they access garment information somehow through the Internet? A number of consumer organisations argued that consumers would probably find it too difficult to use the electronic label and would prefer a physical label instead, or would prefer to ask a sales person.

CEN believes that RFID is still in the infancy stage of development, which means that it is still far too early to talk about possible effects and impacts on consumers⁷². One of the industry organisations⁷³, however, saw the potential for extending RFID benefits to the consumers as well, by for instance including washing instructions in them. It appears that there is potential to use RFID to benefit the consumers as well, but it is also clear that if the technology can be used to track the textiles, it is not acceptable for the consumer organisations to rely on the industry behaving well. From their point of view, rules will have to be introduced in order to overcome the privacy issue.

Consumer organisations were also of the impression that consumers can benefit from RFID chips by being able to track products they have ordered on the Internet⁷⁴ or maybe get access to more information about the product⁷⁵, if the chip could be made readable by the consumer, since it could probably be possible to store more information on a chip than on a physical label⁷⁶.

The BRIDGE project shows a number of ways in which RFID can be used to benefit the consumers, such as informing them about the different sizes, colours etc. a certain garment is available in. Also, "smart" washing machines could possibly be developed that can read the garment RFID chips via a scanner on the machine and base the washing process on that information. However, as of yet, it is not certain that the technology will be able to survive the washing cycle⁷⁷.

⁶⁸ Interview with KEPKA

⁶⁹ Interview with Euratex

⁷⁰ Interview with ANEC

⁷¹ Kuhlmann and Olbertz (2009): Industrial Trial Preparation Final Report, BRIDGE (2009): Final Report, p. 31

⁷² Interview with CEN

⁷³ Interview with AEDT

⁷⁴ Written response from Test-Achat

⁷⁵ Interview with VZBV

⁷⁶ Interview with VKI

⁷⁷ Interview with Euratex, interview with Ginetex

Furthermore, RFID chips are already used in nursing homes in Germany, where the chips help the nurses to correctly sort the garment according to care instructions⁷⁸.

However, it does not seem that the broad majority of the consumers (or the organisations representing them) are ready for this development yet. Three out of four consumer organisations mainly see electronic labelling/RFID as a manufacturer inventory management issue. From a consumer point of view, it would probably be best to leave information on a traditional label.

One industry organisation mentioned that electronic labelling for consumers could be better for the Asian market due to more interest in receiving detailed product information, whereas European consumers do not have that interest to the same extent⁷⁹.

Finally, the use of RFID chips raised another concern regarding electronic waste. If the RFID chips were removed at the point of sale, a system would need to be developed to recycle or reuse the RFID chips. Also, if customers remove the chip at some point, the consumer organisations were worried that the consumers might not dispose of it properly⁸⁰.

4.3. Impacts on industry

The BRIDGE project showed that the retail industry can probably benefit the most from using RFID, as RFID enables the retailers to manage their inventory more efficiently, for instance by locating goods in the store easily and counting goods rapidly. In addition, the BRIDGE project revealed that RFID can be used to track shipments from e.g. outside Europe to the store. Again, this would be used mostly for inventory management purposes.

For the most part, retailers and manufacturers see the potential in using electronic labelling. There are a lot of benefits in the supply chain for RFID, such as inventory control, data management, etc. where suppliers and manufacturers can track, monitor and store data on RFID. That has cost benefits on the supply chain, so further implementation will probably come about when the technology becomes better and cheaper⁸¹.

A few large retailers are running pilot projects using RFID technology in Germany and the Netherlands, among other countries⁸². The benefits they have experienced in the pilots are a reduced time to market, increased cost savings, better inventory control, improved data management, and the availability of more information to handling officers. CEN also believes that, contrary to the achievements on the consumer side, RFID use for inventory management is currently developing quite well.

4.3.1. Associated costs

As the technology for electronic labelling is currently not fully developed, this means that while there are several benefits of using electronic labelling for retailers and manufacturers, the costs are still fairly high. This means that retailers must look at the return on investment for implementing an electronic labelling system by performing a cost-benefit analysis depending on their business model. Two types of costs seem to be the most prominent: the implementation costs and the costs of inserting the chip in the textile product.

⁷⁸ MoreRFID (2008) : Datamars Brings Leading-edge RFID-based Textile Identifications Solution to Nursing Home Sector

⁷⁹ Interview with Euratex

⁸⁰ Interview with VZBV, interview with VKI

⁸¹ Interview with Ginetex

⁸² Interview with AEDT, interview with Ginetex

As for the **development costs**, it could be seen that in Germany, where a number of pilot tests on the use of RFID has been implemented, profits are possible with RFID, but the costs associated with setting up the system are still too high and the return on investment is still low⁸³. The estimated implementation costs used in the BRIDGE project included both hardware and software costs, and took into consideration future prices for the mass market of RFID technology. The table below shows the estimated BRIDGE project costs⁸⁴ (the most recent available figures):

General costs	Euro (per device)
Item Level hanging garment gate	2.500,00 €
Item Level lying garment desk reader/antenna	2.000,00 €
Cash desk reader/antenna	1.000,00 €
Fitting room reader/antenna	2.000,00 €
RFID printer	2.000,00 €
Mobile reader	1.500,00 €
Event management	15.000,00 €
Server	12.000,00 €

The quantity of devices necessary depends on the type of retailer and how it would like to implement the RFID system. For instance, a department store could choose to have the same amount of installations in distribution centres and stores, or could have more installations in distribution centres than in stores, etc. Also, it depends on whether the store wants to focus on customer benefits by installing equipment for smart fitting rooms, shelves and displays, or whether they wish to use the RFID system primarily for inventory management.

In terms of the costs of **inserting the chip in the textiles**, the BRIDGE project estimated that the additional costs per RFID label of the type used in the case study compared to a traditional label were between 8 to 12 cents per label, mainly depending on the volume of tags used (due to economies of scale)⁸⁵.

Another factor to consider when looking at the cost of a RFID label is whether disposable or reusable labels will be used. Disposable labels will be used once and removed at the point of sale. These costs are estimated to be relatively low compared to reusable labels. Unfortunately, specific costs were not mentioned in the BRIDGE project, although it did mention that the costs of RFID labels are decreasing.

The costs for RFID labels should be acceptable for most textile products, but for very inexpensive products which may be sold in supermarkets for a price of e.g. 2€, adding an RFID tag may not be beneficial in the short run⁸⁶. However, in the long run, even producers of inexpensive textiles may gain from using RFID chips, as the BRIDGE project estimated that goods could be counted 20 times faster using RFID than with a manual screening process, which could save man-hours and thereby money in the long run. Whether this benefit would be enough to pay for installing the system is an issue that needs to be investigated further.

⁸³ Interview with AEDT

⁸⁴ BRIDGE (2007): "Supply Chain Management in the European Textile Industry: Business Case", p. 24

⁸⁵ Interview with project manager of the BRIDGE project

⁸⁶ Interview with project manager of the BRIDGE project

The BRIDGE project however showed, not unsurprisingly, that the cost-benefit equation seems to work better for more expensive goods and retailers with a large amount of items, as it is especially with large amounts of goods that time can be saved counting and re-ordering goods.

RFID labelling could be combined with a Registered Identification Number (RN) system, which is currently in place in the US. A RN is issued by the Federal Trade Commission and can be used on the textile label rather than the company name. There are benefits associated with using an RN, such as the ability for buyers to easily identify a company through an RN look-up internet service, less space taken up on the label, and further improvement with inventory tracking by facilitated record-keeping. Therefore, while the concrete benefits cannot be concluded definitively based on this analysis, the combined use of RN number and RFID could further benefit industry and consumers and could be looked into.

Summary of conclusions

Electronic labelling, or RFID tags in textiles, is still in its infancy. In general, electronic labelling is seen mainly to benefit the supply chain of textiles. However, further technological development is necessary in order to decrease costs of implementing electronic labelling and allowing electronic labelling to become mainstream. The costs of developing RFID chips are very high at the moment. The costs of inserting the chip in the textile are relatively modest, but can nevertheless be an issue for very inexpensive textile products. The BRIDGE project showed that the cost-benefit equation works best for relatively expensive products or large amounts of products.

Also, while it is clear that electronic labelling will benefit industry, the benefits for consumers are still in the infancy stage. The main concern related to consumer's use of RFID is the privacy issue, which must be solved before introducing RFID chips to consumers.

5. MULTI-LINGUAL LABELLING

5.1. The current situation

In Article 8 of Directive 2008/121/EC on textile names (recast), it is recognised that some MS may require the national language to be used for the labelling and marking when textile products are sold in their territory to end consumers⁸⁷. Furthermore, in Article 12 of the current proposal for a regulation on textile names and labelling, which replaces Directive 2008/121/EC, it is stated more explicitly that the labelling and marking shall be available in the language of the MS where the textile products are sold if the legislation of the MS requires it⁸⁸.

5.2. Consumers

The three organisations that did have an opinion on this issue agreed that the information should be available in the consumer's national language⁸⁹, and would thus not accept the labelling of the fibre composition in one language only. One of those organisations however said they do not receive many complaints about textile labels not being available in the consumer's language, therefore they assume that the current linguistic labelling regime is acceptable to consumers⁹⁰.

One of the organisations said that uniform requirements should be applied and that it should not be left up to industry to decide what language to put the information in, particularly since it is mandated by EU legislation that consumers should get clear and understandable information⁹¹.

The third consumer organisation having an opinion on the matter stated that the consumers seem satisfied with the current language labelling system, but that since it mostly only applies to fibre names, other textile labelling areas should be looked into being provided in national languages. It was suggested that the way cosmetic ingredients are labelled could be a template for how textile information can be provided in national languages, perhaps online and/or in a brochure at the retailer⁹².

The example of cosmetic information the organisation referred to is the International Nomenclature for Cosmetic Ingredients (INCI) System. It has been in place for 30 years, is based on Latin, and provides a multilingual and multinational way to name cosmetic ingredients. It is also the mandatory system used in the EU, Japan, US, and Canada⁹³. The INCI system requires that the ingredients are listed with the INCI name. Consumers can then look up the INCI name on the internet or in the INCI handbook to find the common name or the name in their language⁹⁴. In this way, for instance in the labelling of textile fibres, perhaps a similar system could be used where the Latin name is used on the label, then the consumer can look up what it is in their language. Naturally, it is recognised that consumers may not like this additional burden of having to look up the information on their own.

⁸⁷ Directive 2008/121/EC of the European Parliament and of the Council of 14 January 2009 on textile names (recast)

⁸⁸ Proposal for a Regulation of the European Parliament and of the Council on textile names and related labelling of textile products (COM/2009/0031 final/2).

⁸⁹ Interview with KEPKA, VZBV, written answer from Test-Achat

⁹⁰ Written answer from Test-Achat

⁹¹ Interview with KEPKA

⁹² Interview with VZBV

⁹³ Making Cosmetics.Com, Inc. (2009): INCI List

⁹⁴ COMMISSION DECISION of 8 May 1996 establishing an inventory and a common nomenclature of ingredients employed in cosmetic products (Text with EEA relevance) (96/335/EC)

5.3. Industry

Currently, most industry organisations decide on the language in which to provide label information by where they are marketing it⁹⁵. This is primarily dependent on their strategy and where their biggest sales are. Also, most producers produce for a few markets with similar languages, for example one producer may sell in Germany, Austria and Switzerland. In this case, multi-lingual labels are not an issue. However, international retailers such as H&M and Zara must put several languages on the label⁹⁶. Industry do not think that it would be too beneficial to provide the fibre content in all national languages, and thinks that by doing so, the labels will be rather large and quite comprehensive, which may mean that the consumers will cut them out. However, this could be solved by only providing the label information in the language of the country in which they are marketing it, which also seems to be the strategy for a number of companies.

CEN thinks that the only information that should be required to be multi-lingual is performance claims. They see that performance claims, such as whether the product is water repellent or flame proof, should be multi-lingual in the areas where it is sold to end consumers. However, CEN did not feel that fibre content should be multi-lingual, particularly since fibre names are relatively similar to each other in different languages⁹⁷. Another organisation agreed, and stated that consumers seem to understand the fibre content even when it is not in their national language⁹⁸.

5.3.1. Associated costs

The costs for industry organisations⁹⁹ associated with mandatory multi-lingual labelling comprise mostly of translation costs and the actual label costs. CEN found the translation costs to be rather insignificant; whereas AEDT found them to be more significant considering that the costs for the creation and management of the multi-lingual labelling would also need to be considered¹⁰⁰. As for the bigger label costs, it was assumed that the more languages necessary, then the bigger the label. One organisation also pointed out that the bigger label could cause additional environmental concerns, since consumers may cut the label out so that the garment is more comfortable when worn¹⁰¹.

Costs of introducing language changes in labels are basically related to two issues: re-labelling already finished garments, and producing different labels for different markets due to language requirements. For *re-labelling* in general (not only regarding language, but any changes to the label), costs have been estimated in the order of 1.5-3€ per label per garment¹⁰². There is no information available regarding the costs of introducing different labels for different markets.

⁹⁵ Interview with CIRFS, Euratex, AEDT, GINETEX

⁹⁶ Interview with Euratex

⁹⁷ Interview with CEN

⁹⁸ Interview with CIRFS

⁹⁹ Interview with AEDT, CEN, CIRFS, and GINETEX

¹⁰⁰ Written response from AEDT

¹⁰¹ Interview with CIRFS

¹⁰² Interview with Euratex, and Commission Staff Working Document (2005): *Annex to the Proposal for a Council regulation on the indication of the country of origin of certain products imported from third countries – Impact Assessment* {COM(2005) 661 final}. According to Euratex, 2-3 EUR would be the cost for a simple garment such as a t-shirt, while more complex garments, e.g. jackets, would be more costly.

Furthermore, three industry organisations are against using pictograms to label the fibre composition. The reason for this is more confusion than clarity in the marketplace, costs associated with marketing the new symbols to consumers, and the complexity of creating the pictograms, particularly since a new pictogram would need to be developed for every new fibre¹⁰³.

Summary of conclusions

In general, there have not been too many complaints filed by consumers on the current system of multi-lingual textile labelling, indicating that the current linguistic labelling regime is acceptable for consumers. The consumer organisations would nevertheless not accept the labelling of the fibre composition in one language only, as the consumers have the right to have this information in their own language. However, few consumer organisations are actually following this area.

The costs for industry are mostly associated with re-labelling (in case of addition of new languages), and with producing different labels for different markets. The industry organisations seem content with the current system, but are not sure it will be beneficial to include information in all national languages. The current prevalent strategy seems to be that information is provided in the language of the markets the companies are targeting. One standardisation body however did not believe that it is necessary to have the fibre content in all official languages, as the fibre names are rather similar.

¹⁰³ Interview with CIRFS, interview and written response from AEDT, Euratex (2009): Preliminary Comments on the Draft Regulation on Textiles Denominations as Discussed by the IMCO Committee

6. COUNTRY OF ORIGIN LABELLING

6.1. The current situation

At present, there is no EU legislation on country of origin marking for industrial products (except for some agricultural products and foodstuffs). The current Community legislation requires a declaration of origin to accompany imported goods, but does not provide for any origin marking except for the above-mentioned specific cases of agricultural products. The situation among MS is heterogeneous, as some MS have regulated the issue and apply different criteria to determine the country of origin for marking purposes, while others have no regulation on the issue at all¹⁰⁴.

The issue of origin marking has been the subject of substantial debate in recent years. Following concerns expressed by some Member States and some sectors, including the textile sector, over the growing incidence of misleading and fraudulent origin marks being carried by imported products, the Commission held consultations and produced working documents on the need and feasibility of an origin marking scheme from 2003 and onwards^{105, 106}. In 2005, the Commission put forward a proposal for a Council Regulation on the indication of the country of origin of certain products imported from third countries¹⁰⁷. The Council has not so far adopted the Commission proposal due to diverging views among member states. Recently, the Commission has tried to revive the draft Regulation, and a briefing note was produced by the Parliament services outlining the situation in November 2009¹⁰⁸. Thus, the current situation is already well described. However, the following sections outline the contents and the reactions to the 2005 proposal as well as the current views of stakeholders on the basis of interviews with industry and consumer organisations carried out for this study.

Currently, third country origin marking regimes are applied by all major trade partners of the EU, including USA, China, Canada, Japan, Russia, and Mexico¹⁰⁹.

6.1.1. The 2005 proposal

The Commission's 2005 draft Regulation (cf. above) proposed the introduction of a mandatory origin marking scheme covering a large range of products mostly (but not exclusively) intended for final consumption, including textiles and textile articles, and applicable to imported goods only. The marking was proposed to be made compulsory for all imported items from countries outside the EU, except for Bulgaria and Romania (at that time still not members of the EU), Turkey, and the EEA countries. The marking was to be placed on the items at the time of entering the Single market, and allowed in any official EU language provided that it would be easily understood by the final customers in the MS in which the goods were to be marketed. The proposed regulation did not define the meaning of "made in", and did not enable controls by customs authorities¹¹⁰.

¹⁰⁴ Community origin marking: The new European Commission Proposals (DG EXPO/B/PolDep/Note/2009_268)

¹⁰⁵ Ibid.

¹⁰⁶ Proposal for a Council regulation on the indication of the country of origin of certain products imported from third countries (COM(2005) 661 final): Explanatory memorandum

¹⁰⁷ Proposal for a Council regulation on the indication of the country of origin of certain products imported from third countries (COM(2005) 661 final)

¹⁰⁸ Community origin marking: The new European Commission Proposals: (DG EXPO/B/PolDep/Note/2009_268): General Briefing

¹⁰⁹ Ibid.

¹¹⁰ Community origin marking: The new European Commission Proposals (DG EXPO/B/PolDep/Note/2009_268), Proposal for a Council regulation on the indication of the country of origin of certain products imported from third countries (COM(2005) 661 final): Explanatory memorandum

The manufacturing industry was divided over the proposal: some did not see the need whereas others supported it (especially the clothing, footwear and furniture sectors which have significant competitiveness issues in relation to third countries)¹¹¹. European associations of importers and wholesalers strongly opposed the proposed scheme¹¹². The made-in label was generally supported by consumers reacting to an on-line consultation by DG Trade in April 2005 which attracted significant interest from stakeholders¹¹³.

The main arguments in favour of the scheme were the following:

- Establishing a “level playing field” and improving competitiveness for European producers, as many trade partners outside the EU already require country of origin marking
- Creating transparency and allowing a better informed consumer decision
- Addressing instances of misleading or fraudulent use of origin indications (would however require the establishment of control mechanisms)

Criticism of the scheme was mainly focused on the following issues:

- Possible increased costs of marking/labelling
- Potential negative impacts in the form of protectionist action relating to foreign imports
- The disruption of integrated chains of production established in third countries by the European companies which have partly or fully relocated or split up their production¹¹⁴

As mentioned, the proposal has not so far passed through the Council.

In 2009, the Commission (DG Trade) presented an options paper in order to feed discussions on how progress could be made towards the adoption of the 2005 proposal¹¹⁵, proposing some reductions in the scope of the proposed regulation (geographically and in terms of products covered). As mentioned by one of the interviewed industry associations, the new Commission document, like the 2005 proposal, can be seen as an attempt to create a tool for protecting industry, rather than a tool for consumer protection.

6.2. Consumers

As mentioned above, consumers who responded to the Commission’s consultation of the issue in 2005 were positive towards country of origin labelling. However, since the consumers responding to a Commission on-line survey are not necessarily representative of consumers in general¹¹⁶, these results do not provide any strong evidence for this issue being something with which the average consumer is much concerned. In the context of this study, five consumer organisations were interviewed on the issue, and four of these did not think it was a good idea to make the made-in label mandatory, as they did not see the benefits for consumers – some even said that they preferred the status quo.

¹¹¹ Interview with Eurocommerce

¹¹² Interview with Eurocommerce and Community origin marking: The new European Commission Proposals (DG EXPO/B/PolDep/Note/2009_268)

¹¹³ It should be mentioned that 97% of the replies came from Italy, but there were more than 5000 replies from other MS and non-EU countries.

¹¹⁴ Community origin marking: The new European Commission Proposals (DG EXPO/B/PolDep/Note/2009_268)

¹¹⁵ DG Trade : Options paper on the Origin Marking Proposal, Ref. 646/09

¹¹⁶ In fact, these respondents are rather unlikely to be representative as the consumers who make the effort to answer the survey will tend to be those who are already interested in the subject and may be assumed to generally be in favour of initiatives that will provide more information.

Academic researchers debate the extent to which the country of origin has an impact on consumers' willingness to buy a product; while some research has shown that country of origin matters to consumers, other studies found that the brand or the origin of the design is often more important than the country of origin (examples mentioned include for instance Nike shoes which are perceived by US consumers as "American" even though they are in fact manufactured in China)¹¹⁷.

One consumer organisation cited the difficulties with the country of origin labelling because of the many steps involved in the production of textile products, of which many are made in different countries. This means that the label would not provide sensible information to consumers because it would not be able to say where all the steps were made. For instance, should the label say "made in Germany" if that is where the last button was put on, or should it say where the fibre comes from? Thus, there is a strong need for clear definitions, and subsequently for control of the information provided¹¹⁸. The Commission proposal states that the made in label should present the country in which the garment was last substantially altered, but this may not be very informative to the consumer as they may want to know where the fabrics originate from as well.

6.3. Industry

Several of the interviewed industry representatives pointed, like the consumer organisations, to the question of what country of origin means (origin of the fibre, where the main assembly took place, where the product was finalised, etc.). In other words, there is a need for a clear definition of the concept. The definition put forth in the Commission proposal was also questioned by a number of industry organisations, as many production processes are rather complex (that several countries may be involved in the production of a single t-shirt). Several interviewees therefore questioned whether the information that can be provided will actually benefit the consumer, because the label can never tell the full story, as the fabric can be altered or treated in many different countries which are not shown on the label. This means that the made-in label has no impact on product safety or consumer health.

There is no uniform attitude towards country of origin marking neither among European industry, nor between, and within, Member States. Manufacturers producing inside the EU are generally in favour of origin labelling because European quality standards are perceived as high by consumers (compared to, for instance, garments produced in China). Thus, it could be of value for manufacturers producing in Europe to show consumers that the product is made in one of the EU member states. In very general terms, the north of Europe leans towards being against a made-in label approach, because the industry here tends towards producing world-wide, while southern and eastern countries tend to favour a made-in label, because they produce more inside than outside the EU. However, even within countries positions are split because the viewpoint depends mostly on the competitive position of the individual company.

To this should be added that the current proposal only requires labelling of country of origin from products from outside the EU, which means that the labels may only contain part of the information. However, others pointed out that consumers are looking at brand name and the fibre content, while the rest is not as important. For that reason, many companies consider that a brand label can guarantee quality and social responsibility, possibly more than a made-in label¹¹⁹.

¹¹⁷ Community origin marking: The new European Commission Proposals (DG EXPO/B/PolDep/Note/2009_268), and Josiassen and Harzing (2008): Descending from the ivory tower

¹¹⁸ Interview with VZBZ

¹¹⁹ Interviews with CIRFS, Euratex, Eurocommerce

6.3.1. Associated costs

The Commission's own Impact Assessment study estimated that introducing a new made-in label would add to the cost of the products – around 1.5€ per garment and 2€ per pair of shoes. This extra cost may be expected to be added directly to the consumer price of the product, as the profit margin in especially the footwear industry is low. It has furthermore been pointed out that this estimate does not take into account the additional costs related to the stock control between the goods with mandatory origin marking and goods without¹²⁰. Increased costs for monitoring the supply chain are also mentioned in interviews, but not quantified.

Control costs would also increase (cf. below). However, an industry representative points out that it is not very likely that MS would introduce a separate marking system, but rather integrate the country of origin marking with other control systems so costs would not be too high. Along the same lines, the interviewee doesn't think that costs for final producers would be very high, since there are already labels on products, and it would thus not be very costly to add country of origin information.

However, a retail organisation argues that as for fibres, the "made-in" will have to be put in the label in many languages. For example, in a piece of lingerie, the label could have 20 languages for fibre names and 20 languages for made-in, which could make the label very big.

6.4. Member states - Control and administrative burdens

Obviously, if the made-in label were to be made mandatory, the regulation could – and should – serve as the basis for control. But as for other labelling issues, the question is who and how should control this? Since the proposed regulation concerns only goods imported into the EU from third countries and requires the marking to be present at the time of entry into the Single Market, control would have to take place at the external borders, i.e. by customs. One interviewee stated that this might lead to lengthy controls at customs if all made-in label were to be controlled. Again, more time and resources will probably need to be spent on compliance and surveillance.

¹²⁰ Clothing and Textile Trade Organisations of European and Mediterranean countries (2007): Tunis Declaration

Summary of conclusions

Country of origin labelling has already been the subject of significant debate since it was covered in a Commission Regulation proposal from 2005 which was, however, blocked in the Council.

The benefits for consumers are limited to “better information” as country of origin marking has no impact on the health or safety of consumers. Also, due to the many steps often involved in producing a garment, defining the country of origin as the last country where the garment was substantially altered may not inform consumers to a satisfying extent.

For industry, benefits are mainly expected in terms of (marginally) increased competitiveness for EU producers in the Single Market since EU consumers may tend towards a preference for products originating from EU Member States, as these are perceived as generally being of better quality than imported goods from third countries. However, positions are deeply split among industry, as well as between and inside Member States, depending on the competitive position of the individual company, in particular whether the garments are produced inside the EU or sourced from outside the EU.

On the cost side, the price of imported garments may increase as a result of increased costs of labelling, monitoring of the production chain, and administrative and control burdens related to documentation and customs handling, which may negatively affect the competitiveness of importers (wholesalers and retailers) vis-à-vis European manufacturers. The impact assessment carried out in connection with the Commission's 2005 proposal estimated this cost at around €1.5 per textile garment for inserting new labels, and additional costs (logistics, supply chain monitoring) may be involved as well.

7. ECOLOGICAL LABELLING

7.1. The current situation

There are a number of voluntary ecological labelling initiatives in Europe today. The European Ecolabel is a voluntary scheme introduced in the beginning of the 1990s, applied on a wide range of products, including textiles. Products and services awarded the Ecolabel carry the flower logo, allowing consumers - including public and private purchasers - to identify them. The regulation (EC) No 1980/2000 on the EU Ecolabel scheme sets out the guidelines for the Ecolabel, including the tests needed to obtain the label, such as wastewater treatment, biodegradable dyes, etc.¹²¹. The regulation provides that specific eco-label criteria are to be established according to product groups and regularly reviewed. The most recent criteria for the award of the Community eco-label to textile products were established with a Commission Decision in 2009¹²². The criteria are divided into three main categories: a) textile fibres, b) processes and chemicals, and c) fitness for use. The ecolabel shall be accompanied by the following text: "encouraging the use of sustainable fibres", "durable and high quality" and "hazardous substances restricted".

The German label Öko-tex is, according to industry, the most widespread eco-label in Europe. It is a recognised measure of ecological and health consciousness, and is widely used in the textile production sector in Europe¹²³. The Öko-tex Standard 100 was introduced at the beginning of the 1990s as a response to the needs of the general public for textiles which posed no risk to health. In order to be entitled to mark and advertise textile products with the Öko-tex label, all components, including accessories, must satisfy the requirements of a criteria catalogue without exception. The Öko-tex certificate issued is evidence of this. Manufactured end products usually require their own test, even if all components have already been successfully tested and certified according to the Öko-tex Standard 100¹²⁴.

7.2. Consumers

Consumer organisations state that consumers are increasingly interested in natural and organic products in various areas, including textiles¹²⁵. One consumer organisation has estimated that the market for eco-labelling is growing rapidly every year¹²⁶. This means that according to the consumer organisations, there is definitely a demand for eco-labelling in the EU. This is supported by a current Eurobarometer survey (2009) where half of the interviewed participants state that eco-labelling plays an important role in their purchasing decisions. Large country variation could nevertheless be witnessed, ranging from 64% in Greece to 22% in Czech Republic. The study further shows that certain types of consumers are interested in eco-labelling, including those with a relatively higher awareness of the environmental impact of the products that they buy and use¹²⁷, a finding that is not unexpected.

¹²¹European Ecolabel (2009): What is the Ecolabel? and interview with Eco-label

¹²² COMMISSION DECISION of 9 July 2009 establishing the ecological criteria for the award of the Community Eco-label for textile products (2009/567/EC)

¹²³ Interview with CIRFS

¹²⁴ Oeko-Tex (2009): Oeko-Tex Standard 100

¹²⁵ Interview with VZBV, written answers from Test-Achats

¹²⁶ Estimation from Test-Achats

¹²⁷ Eurobarometer (2009): Europeans' attitude towards the issue of sustainable consumption and production

The consumer organisations however state that the current labels, especially the European Eco-Label, are not so well-known among consumers yet¹²⁸, and this is supported by a German study on eco-label opportunities¹²⁹. The aforementioned Eurobarometer survey confirms this to some extent, as around 40% of the interviewees had seen the Eco-label while only around 20% had bought products bearing the label¹³⁰.

One consumer organisation believes that the most important aspect for the ecological labels is that consumers must be able to trust them¹³¹. With respect to textiles, this might be difficult due to the numerous steps involved in the textile production, and the consumer organisations thus call for strict regulation of ecological labels in textiles, such as minimum requirements and common definitions for organic and/or natural products, and welcome an introduction of a mandatory labelling of organic and natural products, covering the above issues^{132, 133}.

The Eurobarometer survey shows that consumers are especially interested in whether a product can be recycled/reused, and whether a product comes from environmentally-friendly sources¹³⁴. The latter is also discussed by one of the consumer organisations, which stated that it should be clarified whether for instance genetically modified products can be used in eco-labelled clothing, and if a textile can be considered ecological if it contains RFID¹³⁵.

7.3. Industry

The standardisation bodies, industry organisations¹³⁶ and a member of the Eco-label team in DG Environment do not perceive consumers to be very aware of eco-labelling. The German Öko-tex is generally believed to be the most well-known eco-label across Europe and is used rather extensively in some countries¹³⁷, whereas fewer consumers are perceived to be aware of the European Eco-label. Some large companies, such as H&M and Carrefour, are using the Eco-label, but generally it could be more widespread, and possibly would be if consumer demand was greater¹³⁸. Most companies involved in ecological labelling appear to aim at increasing their corporate social responsibility profile.

At the moment, it does not seem to be entirely clear what for instance organic labelling means, an issue raised both by one of the consumer organisations and one of the industry organisations¹³⁹. CEN is currently working on these definitions through its work with standard TC 248¹⁴⁰ and a working group which has been formed to define ecological claims. The working group is currently defining appropriate clauses or claims and put a definition in a standard, deciding what i.e. 'organic' means so that a definition exists and that it can be ensured that it is used correctly¹⁴¹.

¹²⁸ e.g. Interview with VZBV

¹²⁹ Institute for Ecological Economy Research (2008): Enabling developing countries to seize eco-label opportunities

¹³⁰ Eurobarometer (2009): Europeans' attitude towards the issue of sustainable consumption and production

¹³¹ Interview with VZBV

¹³² Interview with VZBV, written answers from Test-Achats

¹³³ Written answer from Test-Achats

¹³⁴ Eurobarometer (2009): Europeans' attitude towards the issue of sustainable consumption and production

¹³⁵ Interview with KEPKA

¹³⁶ E.g. Interviews with CIRFS and CEN

¹³⁷ Interview with CEN

¹³⁸ Interview with Eco-label

¹³⁹ Interviews with VZBV and AEDT

¹⁴⁰ Interviews with AEDT and CEN

¹⁴¹ Interview with CEN

One industry organisation believes that one of the reasons why eco-labelling is not very widespread as of yet is that the administrative procedures as well as the environmental provisions are very strict. Also, costs are involved in getting an eco-label as tests need to be undertaken in order to ensure that the textile is compliant¹⁴². This, coupled with the perception that consumers are not overly interested in eco-labelling for textile products, makes eco-labelling less interesting for industry¹⁴³. However, the consumer organisations state that in order for consumers to have faith in an eco-label, the provisions need to be relatively strict. Thus, industry and consumers will need to reach a common consensus on this in order for an eco-label to be a success.

7.3.1. Associated costs

Industry generally agrees that there will be significant extra costs involved in obtaining an Eco-Label¹⁴⁴. However, the exact amount of costs is less clear¹⁴⁵. CEN estimates that the costs will be around 150 Euro per garment, but this is mainly a "guesstimate" covering the tests needed. The test laboratories contacted for this report mainly carry out chemical tests, and could not estimate the costs for obtaining an ecological label either. One national textile research centre providing testing and certification stated that they rarely received enquiries about Eco-label testing and could thus not provide a price. The costs of testing itself depends on the type of textile, material, the company's supply chain (i.e. who the suppliers are and how long they have supplied the company in question), whether they have recently had administrative certification, etc¹⁴⁶.

Ecolabelling Denmark¹⁴⁷ have created an overview of the types of costs producers face when applying for the European Eco-label. The types of direct and indirect costs associated with obtaining the Eco-label are presented below¹⁴⁸.

Direct costs:

- Application fee: The application fee is 500 Euro. The application fee must be paid shortly after the application has been sent. This fee does not cover any other possible expenses.
- Annual fee: The annual fee is 0.15% of the license-holder's turnover within the Community of the product awarded the eco-label.
- Fitness for use testing: The end products have to be tested according to the test methods specified in criteria 34-39 of the regulation by a certified independent test laboratory. The amount of textile samples that must be tested depend on the number of textiles included in the application.
- Testing fibres: Cotton has to be tested for a range of pesticides as specified in the criteria 2 by a certified independent test laboratory.
- Testing waste water: The COD content (Chemical Oxygen Demand) has to be tested if the waste water treatment plant does not already have them.
- Possible improvement of waste water treatment plant: If the COD reduction is not high enough the plant might have to be improved.

¹⁴² Interview with CEN

¹⁴³ Interviews with CIRFS, DG ENTR and CEN

¹⁴⁴ E.g. interviews with CEN, CIRFS and Euratex

¹⁴⁵ The interviewees for this study, including the Commission (the Eco-label team in DG ENV), CEN, nor others, could not provide any exact cost estimates.

¹⁴⁶ Interview with Centexbel

¹⁴⁷ The organisation responsible for the administration of the two officially approved ecolabels in Denmark: The Nordic Eco-label and the European Eco-label

¹⁴⁸ Ecolabelling Denmark: Memo on How to apply for the European Ecolabel for textile companies

- Expenses to cover an inspection visit: As a part of the certification process the Ecolabelling office in the MS where the application is filed will have to visit the applying company and some of their major suppliers. If some of the production is placed outside Europe the transport to the supplier and the stay in the country in question shall be paid by the applying companies.
- Possible expenses to an external consultant: If the applicants want to use an external consultant to help them in the process, they have to pay for the expenses themselves.
- In addition, Euratex mentions additional costs of controlling the supply chain (ensuring that the supply chain continuously lives up to standards)

Indirect costs:

- Possible limitation of suppliers: The suppliers have to be approved by Eco-label and only approved suppliers may be used. This may cause some restrictions for the applicants in selecting suppliers.
- Internal man hours: According to Ecolabelling Denmark, this cost is significant as it can take long to get the Ecolabel.

Summary of conclusions

The consumer organisations following the area of ecological labelling believe that consumers are increasingly interested in the area, whereas the industry organisations do not see consumer demand as very strong as of yet. The benefits for consumers of eco-labelling would be that the garment is free of chemicals, and that they feel that they contribute to a safer environment.

The types of costs involved in getting an ecological label range from application fees to chemical tests and expenses to cover inspection visits to suppliers. As these costs are relatively significant, the general consumer demand for ecological labelling will probably have to grow stronger before industry can see the benefits of investing in it. As of now, companies investing in ecological labelling of textiles seem to be either large companies (H&M, Carrefour) and/or do so in order to improve the company's corporate social responsibility profile.

8. SIZE LABELLING

8.1. The current situation

As of today, harmonisation of the size system is covered by a European voluntary standard EN13402 on size designation of clothes. Nevertheless, as economic operators are not obliged to apply the standard, different size labelling systems are common practice in most Member States.

The EN13402 standard has been prepared by CEN since 1998 and currently provides the following¹⁴⁹:

1. Terms, definitions, measuring points, and matchstick man designating size.
2. Primary and secondary dimensions to use when sizing garments. For example, women's pants are sized primarily by waist and secondarily by length. How to measure this would be shown on a pictogram.
3. Various measures and size intervals, meaning that standard intervals for sizes now exist.

The standard gives according to CEN a good basis for a harmonised sizing system in Europe. But there is still not consensus among the Member States on whether to apply it¹⁵⁰. Part 4 of the standard, concerned with linking the specified measures and size intervals to a uniform code, is still under development in CEN. The work centres around development of a multidigit code where each position designates a measurement on a scale for a particular body parameter – examples could include a combination of height, weight, and body type indications – instead of the current one-parameter sizing which can for instance be based on measurement across the chest (depending on the type of garment). Some garments could be described by three parameters (i.e. a three-digit code), whereas others may require more to fully describe the measurements/sizing of the garment. There is, however, substantial disagreement within the working group as to whether it is feasible and desirable to introduce such a uniform system across Europe. The issue has not yet been resolved, and it thus remains to be seen whether the end result will be a new, harmonised sizing system¹⁵¹.

8.2. Consumers

Of the two consumer organisations that had an opinion on the matter does not believe that the area of size labelling is the biggest problem in connection with textiles, as it rarely experiences consumer complaints with respect to sizing. Consumers can generally ask in shops which size to buy¹⁵², and many online stores have size conversion tables. Another consumer organisation, however, believes that consumers do have problems finding the right size of clothes due to the number of different size labelling systems in Europe¹⁵³. The sizing systems include (but are not limited to) the UK system (6, 8, 10 etc.), the US system (also 6, 8 10 etc. but not consistent with the UK system), the system of S, M, L etc. and the system of 36, 38, 40 etc. where the numbers have different meanings in, for instance France, Germany and Italy. In addition, a medium in Germany is not the same size as a medium in Spain, as different standards apply in different countries.

¹⁴⁹ Interview with CEN

¹⁵⁰ Interview with AEDT

¹⁵¹ Interview with a member of the working group

¹⁵² Interview with VZBV

¹⁵³ Written answers from Test-Achats

The two consumer organisations however agree that it would be a benefit to consumers if sizes were harmonised in Europe, however, one consumer organisation states that this might be difficult due to the differences in sizes in the different MS¹⁵⁴. Industry support this statement, and also highlights that one of the most significant costs expected to be encountered is the re-education of consumers. This will be discussed in more detail in the section on costs.

8.3. Industry

Generally, the industry organisations seem positive towards introducing a harmonised size labelling system in the EU. However, the issue has been discussed for more than 20 years at CEN level, and problems pertaining to which system should be used still exist. If for instance the French system was applied, the rest of Europe may not be willing to comply with this¹⁵⁵. This is also demonstrated by the disagreements over Part 4 of the CEN standard being developed, as described above. CEN supports this by stating that retailers may not want to change to the new system voluntarily, as it will alienate their national customers. Thus, CEN believes that a harmonised system will only work if it is introduced as a legislated harmonised system. A mandatory harmonisation of size labelling may push industry to agree on the intervals for each size, meaning how to cut the garment¹⁵⁶. Also, CEN states that even with legislation there still would not necessarily be entirely harmonised sizes, as retailers might interpret the standards to fit their needs best.

However, not all industry organisations believe that a legislated system is the most beneficial solution for industry as it is far easier to keep size labelling voluntary and stick to the current harmonisation level, which implies that any sizing label should refer to certain body dimensions and should be measured in centimetres¹⁵⁷. This viewpoint can be supported by the fact that consumer organisations are not overly concerned about differences in size labelling.

8.3.1. Associated costs

The industry organisations generally agree that costs would be very large, especially in a transition period between the old and the new system. Costs would especially be related to educating consumers¹⁵⁸, but there will also be costs in terms of resizing garments.

In a transition period, industry foresees that every garment would need a dual label stating the sizes according to the existing and the new system. Information campaigns explaining a possible new system to consumers would also be necessary. Industry is not able to estimate the costs of this, other than that it expects the costs to be massive¹⁵⁹. None of the retailers would want to be the first to introduce the system, as it would probably alienate its customers, which is why it is imperative that all retailers start the new regime simultaneously.

The other main cost foreseen is the resizing of garments. Retailers and manufacturers may have to resize the blocks they cut garments from, as these do not follow a uniform standard across Europe¹⁶⁰. In the UK, the change from inches to centimetres will also present a challenge, as for instance men's shirts go by half inch intervals. If the UK retailers change their sizing regime to centimetres, they will end up with additional sizes because half an inch is bigger than a centimetre¹⁶¹.

¹⁵⁴ Interview with VZBV

¹⁵⁵ Interview with Euratex

¹⁵⁶ Interview with Euratex

¹⁵⁷ Interviews with Ginetex and Euratex

¹⁵⁸ Interviews with CEN and Euratex

¹⁵⁹ Interviews with Ginetex and CEN

¹⁶⁰ Interviews with Euratex and CEN

¹⁶¹ Interview with CEN

In short, the costs foreseen by industry are estimated to be quite substantial, even though it was not possible to include actual figures. The benefits would be that it might be easier for producers to work with only one size regime when producing for the European market. However, the benefits for the consumers may be limited and may even be a disadvantage in the short term, as consumers will have to get used to different sizes.

Summary of conclusions

Consumer organisations in general are not very concerned about the area of size labelling. Some even state that this is not the area that is the most problematic for consumers, but still think that a harmonised system in general would be beneficial as consumers will then be met with identical size labels across Europe.

The majority of industry organisations believe that consensus on size labelling will not be reached voluntarily, as it will be difficult to choose which system to apply. However, the majority of industry organisations seem to be in favour of a common system, despite their perception that it would impose relatively large costs on industry, especially in terms of re-educating the consumers.

Although the industry organisations in general are positive towards a harmonisation as it may be easier for their members to know that only one system exist in Europe, it is also clear from the interviews that consensus has not been reached as of yet among their members with respect to which system should be used.

9. CONCLUSIONS

Generally, the consumer organisations do not seem to follow the area of textile labelling very closely, with the exception of chemical labelling. Reasons include the fact that missing or improper textile labelling is not a risk to consumers' health (again, with the exception of chemical labelling). However, the consumer organisations that we interviewed, which had an opinion on textile labelling, generally felt that consumers could benefit from harmonised, mandatory systems, primarily as they would then be certain to meet the same systems in the entire EU and that it would be an assistance to consumers if they are to file complaints. For chemical labelling, it is however more a question of the consumer's right to know about potential chemicals in textiles.

The industry organisations were generally in favour of voluntary systems, primarily due to the costs that they expected would be the result of a mandatory system. For the MS, the main cost of a mandatory system would be increased market surveillance, which may be problematic given that the market surveillance authorities in some MS have problems meeting their responsibilities within their given capacities today.

Below are presented the conclusions emerging from each area of textile labelling.

9.1. Care labelling

In the area of care labelling, the large European consumer organisations are not following the area closely, which indicates that care labelling is not their main priority. Reasons include the fact that missing or improper care labelling does not present a risk to consumers' health. However, the consumer organisations having an opinion on care labelling agree that consumers would benefit from a mandatory regime as this would increase consumer confidence and help them to file complaints against manufacturers or dry cleaning shops. The drawback of a voluntary system is also that companies are free to decide whether they will use it, meaning that the consumers cannot be absolutely certain to always meet the same system across the EU. The main costs associated with mandatory care labelling are for industry the costs of additional testing mainly due to pressure from retailers, while for MS it is the additional market surveillance which needs to be undertaken. The industry organisations (producers and retailers) as well as standardisation bodies are all against a mandatory regime, both because the current voluntary regime, where Ginetex symbols are used as a basis for the ISO standard which is applied across Europe, works well, and because of the associated costs.

9.2. Chemical substances in textiles

Consumer organisations are very concerned about the level of chemical substances in textiles, and state that consumers should have a right of information about this issue. Consumer organisations however also believe that labelling is not sufficient, and that new legislation will need to be introduced. Labelling can be used to inform the consumers only, not to enable them to make decisions on health risks. If legislation is not sufficient, then it would need to be strengthened and compliance will have to be monitored more closely. The consumer organisations feel strongly that this is an area that is not sufficiently addressed in the current legislation, and a study could possibly be undertaken in order to determine whether new legislation is needed.

The costs for industry related to chemical labelling will mainly be on additional tests for chemical substances, as industry fears that all products will need to be tested as opposed to the random tests carried out today. Industry is not in favour of labelling, as they think that the REACH Regulation covers chemical substances sufficiently and that it is then a question of compliance which should be checked by the market surveillance authorities.

Also, they do not believe that a label will add value to the consumer, since responsible producers will comply with legislation, and those that may not comply are not likely to present that information on a label.

9.3. Electronic labelling – RFID in textiles

The benefits of RFID for consumers are still in the infancy stage. The main issue related to consumer's use of RFID is the privacy issue, meaning that consumer organisations fear that it will be possible for industry to track consumers and subject them to direct marketing based on their previous purchases (e.g. saving information linked to credit card purchases). The issue of privacy must be solved before introducing RFID chips to consumers.

In general, electronic labelling mainly benefits the supply chain of textiles. However, further technological development is necessary in order to decrease costs of implementing electronic labelling and allowing electronic labelling to become mainstream. The costs of developing RFID chips are very high at the moment. The costs of inserting the chip in the textile are relatively modest, but can nevertheless be an issue for inexpensive textile products. The BRIDGE project showed that the cost-benefit equation works best for relatively expensive products or large amounts of products.

9.4. Multi-lingual labelling

In general, there have not been too many complaints filed by consumers on the current system of multi-lingual textile labelling, indicating that the current linguistic labelling regime is acceptable for consumers. The consumer organisations would nevertheless not accept the labelling of the fibre composition in one language only, as the consumers have the right to have this information in their own language.

The costs for industry are mostly associated with re-labelling (in case of addition of new languages), and with producing different labels for different markets. The industry organisations seem content with the current system, but are not sure it will be beneficial to include information in all national languages. The current prevalent strategy seems to be that information is provided in the language of the markets the companies are targeting. One standardisation body however did not believe that it is necessary to have the fibre content in all official languages, as the fibre names are rather similar.

9.5. Country of origin labelling

Country of origin labelling has already been the subject of significant debate since it was covered in a Commission Regulation proposal from 2005 which did, however, not pass through the Council. The benefits for consumers are limited to "better information" as country of origin marking has no impact on the health or safety of consumers. Also, defining the country of origin as the last country where the garment was substantially altered may not inform consumers to a satisfying extent. For industry, benefits are mainly expected in terms of (marginally) increased competitiveness for EU producers in the Single Market since EU consumers may tend towards a preference for products originating from EU Member States, as these are perceived as generally being of better quality than imported goods from third countries. However, positions are split across industry as well as between and inside Member States, since they depend on the competitive position (location of production) of individual companies.

On the cost side, the price of imported garments may increase as a result of increased costs of labelling, monitoring of the production chain, and administrative and control burdens related to documentation and customs handling, which may negatively affect the competitiveness of importers (wholesalers and retailers) vis-a-vis European manufacturers. Additional costs (logistics, supply chain monitoring) may be involved as well.

9.6. Ecological labelling

The consumer organisations believe that consumers are increasingly interested in the area. The benefits for consumers would be that the garment is free of chemicals, and that they feel that they contribute to a safer environment.

The types of costs involved in getting an ecological label range from application fees to chemical tests and expenses to cover inspection visits to suppliers. As these costs are relatively significant, the general consumer demand for ecological labelling will, according to industry, have to grow stronger before industry can see the benefits of investing in it. Contrary to the consumer organisations, industry has not yet seen a substantial consumer demand for ecological textiles.

9.7. Size labelling

Consumer organisations in general are not very concerned about the area of size labelling. Some even state that this is not a problematic area for consumers, but still think that a harmonised system in general would be beneficial as consumers will then be met with identical size labels across Europe.

The majority of industry organisations believe that in order to reach consensus on size labelling a legislative system is needed. Likewise, the majority of industry organisations are in favour of such a system, despite their perception that it would impose relatively large costs on industry, especially in terms of re-educating the consumers. Moreover, although the industry organisations in general are positive towards a harmonisation as it may be easier for their members to know that only one system exist in Europe, it is also clear from the interviews that consensus has not been reached as of yet among their members with respect to which system should be used.

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ANNEXES

List of Interviews

<i>Organisation</i>	<i>Description</i>	<i>Contact</i>	<i>Title</i>	<i>Date of Interview</i>
CONSUMER ORGANISATIONS				
ANEC	European consumer voice in standardisation	Chiara Giovannini	Research & Innovation manager	25 November
KEPKA	Greek consumer organisation	Evangelia Kekeleki	General Secretary	23 November
Test-Achats	Belgian consumer organisation	Gilles de Halleux	European Affairs Advisor	9 December (written response)
VKI	Austrian consumer organisation	Arno Dermutz		14 December
VZBV	German consumer organisation	Monika Büning	Policy Officer	27 November
INDUSTRY				
AEDT	European Association of Fashion Retailers	Antonio Barberi Ettaro	Rapporteur for labelling	12 December
BRIDGE/GS1	Coordinators of BRIDGE programme	Henri Barthel	Director: System Integrity, Global Partnerships	24 November
CEN	European Committee for Standardisation	Frank Moore	Chairman	26 November
CIRFS	European man-made fibres association	Colin Purvis	Director General	24 November
DEKRA	Product testing laboratory	Peter Spengler	Head of Department for Product Analysis	10 December
Euratex	European Apparel and Textile Confederation	Francesco Marchi	Director General	23 November
EuroCommerce	Retail, wholesale, and international trade representation to the EU	Ralph Kamphöner	Senior Advisor International Trade	23 November
GINETEX	International Association for Textile Care Labelling	Adam Mansell	President	25 November
Kvintett Group	Swedish industry group, manufacturer of workwear	Christina Rylander-Kalbo	Representative to Swedish Standard Institute, working group for size labelling	11 January
EUROPEAN COMMISSION				
DG ENTR	Directorate-General for	Luis-Filipe Girao	Head of Unit	27 December

	Enterprise and Industry			
DG ENTR	Directorate-General for Enterprise and Industry	Eva-Patricia Hualde-Grasa	Policy Officer	27 December
DG ENV	Directorate-General for Environment	Benjamin Caspar	Head of Team, European Eco-Label	11 December
DG TRADE	Directorate-General for Trade	Jon Nyman	Policy Officer	3 December

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