

**Frequently Asked Questions (FAQs) on
Regulation (EU) No 1007/2011
on textile fibre names and related labelling and marking of the fibre composition of textile
products**

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INTRODUCTION

Regulation (EU) No 1007/2011¹ on textile fibre names and related labelling and marking of the fibre composition of textile products (hereafter the ‘Textile Regulation’) lays down:

- conditions and rules for the labelling and marking of textile products,
- rules on textile fibre names.

The Textile Regulation:

- covers products at all stages of the supply chain,
- requires that textile products sold in the EU be labelled or marked to provide information about their fibre composition.

It does not lay down any information requirements concerning:

- the producer or importer,
- the presence of substances potentially detrimental to human health,
- the materials and methods involved in manufacturing textile products,
- instructions or warnings to the consumer about using textile products.

The current obligations under the Textile Regulation have not significantly changed compared to obligations under Directive 2008/121/EC². Regulation (EU) No 1007/2011 repealed Directives 73/44/EC, 96/73/EC, and 2008/121/EC as of 8 May 2012. Further details on the Textile Regulation are available at: https://single-market-economy.ec.europa.eu/sectors/textiles-ecosystem/textiles-leather-fur_en#the-textile-labelling-regulation-eu-10072011.

¹ Regulation (EU) No 1007/2011 of the European Parliament and the Council of 27 September 2011 on textile fibre names and related labelling and marking of the fibre composition of textile products — OJ L 272, 18.10.2011

² Directive 2008/121/EC of the European Parliament and of the Council of 14 January 2009 on textile names — OJ L19, 23.1.2009

The legal text in all EU languages is available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02011R1007-20180215>.

A number of terms used in the Textile Regulation, such as *making available on the market*, *placing on the market*, *importer*, *economic operator* or *distributor* correspond to the definitions set out in the Market Surveillance Regulation (EU) No 2019/1020³. For the purposes of this paper, the term *marketed* shall be understood to mean *placed on the market* or *made available on the market* depending on the context.

Disclaimer: Please note that the questions and answers provided in this paper are intended to assist [stakeholders/businesses/...] in the application of Regulation (EU) No. 1007/2011. Only the Court of Justice of the European Union is competent to authoritatively interpret Union law.

1. GENERAL

1.1 Does the Textile Regulation already apply?

Yes, the Textile Regulation applies since 8 May 2012 (Article 28).

1.2 What about labelling that was being used before the Textile Regulation came into force? Does it need to be changed before the end of the transition period? Could retailers, for example, ask textile producers to re-label their products?

Textile products which were placed on the market and complied with Directive 2008/121/EC before the Textile Regulation started to apply (i.e. before 8 May 2012) could still have continued to be made available on the market until the end of the transition period, i.e., 9 November 2014 (Article 26). However, after 9 November 2014, only products that comply with the Textile Regulation are allowed on the market, and any non-compliant products should have been re-labelled or otherwise removed from the distribution chain within the EU. All products placed on the market after 8 May 2012 have to comply with the Textile Regulation. ‘Placing on the market’ means making a product available on the EU market for the first time (see Market Surveillance Regulation (EU) 2019/1020).

2. SCOPE

2.1 What items does the Textile Regulation apply to?

The scope of Regulation (EU) No 1007/2011 is laid down in Article 2, which is the basis for businesses to consider whether the Regulation applies to their products. The labelling and marking requirements on fibre composition apply notably to textile products and textile components containing at least 80% textile fibres by weight of the textile product or textile components, respectively.

2.2 Would dress designers and milliners who make one-off pieces for clients and sell them through their own websites qualify for the exemptions that apply to ‘selfemployed tailors’?

That depends. The Textile Regulation does not explicitly define ‘self-employed tailors’.

³ Regulation (EU) 2019/1020 of the European Parliament and of the Council of 20 June 2019 on market surveillance and compliance of products and amending Directive 2004/42/EC and Regulations (EC) No 765/2008 and (EU) No 305/2011 – OJ L 169, 25.06.2019

However, the relationship between ‘customised textile products’ and ‘self-employed tailors’ determines whether the Textile Regulation applies (Article 2(4)), as referred to in Recital 4). For example, the Textile Regulation would apply to *non-customised* textile products sold by a self-employed tailor. On the other hand, the Textile Regulation would not apply to one-off pieces, referred to as ‘customised products’, sold by a selfemployed tailor to a final consumer, whether through a website or any other channel.

2.3 What about textile products that are not intended for sale to final consumers, but which are sold to corporate purchasers (e.g. uniform rental and cleaning companies), worn by their employees, collected for cleaning, and then sent out again to employees? Should such products carry labels stating their fibre contents and giving wash care instructions?

Yes, every textile product must be labelled or marked to show its fibre composition whenever the product is made available on the market (Article 14(1)), except in cases set out under Article 14(2). ‘Making available on the market’ means supplying a product for distribution, consumption or use on the EU market in the course of a commercial activity, whether in return for payment or free of charge (see Market Surveillance Regulation (EU) 2019/1020). However, there are no harmonised EU rules on telling the consumer how to wash or maintain textile products.

2.4 Annex V of the Textile Regulation (previously Annex III to Directive 2008/121/EC), says that ‘textile parts of footwear’ need not be labelled or marked. Does this apply to every textile component in the footwear, or only to the warm lining? What about the linings of gloves, mittens, and mitts?

The answer depends on the composition of each specific product. Under Article 2 of the Textile Regulation, a product is regarded as a textile product if it is made of at least 80% textile fibres. Consequently, in each case, businesses have to assess whether the warm lining of their glove, mitten, etc. qualifies as a textile product for the purposes of the Regulation. In the case of footwear, even if the lining is a textile product, this category is exempted from mandatory labelling under Annex V item 23 of the Regulation. However, the Footwear Directive (94/11/EC⁴), lays out labelling requirements applicable to the materials used in the main components of footwear for sale to the consumer, including those made of textile fibres.

2.5 Feather beds filled with down may contain less than 80% textile fibres by weight. Does this mean they are outside the scope of this Regulation?

Yes, if a product contains less than 80% textile fibres by weight, it does not fall within the scope of the Textile Regulation. However, the textile components of mattress coverings are treated as textile products (Article 2(2)(c)(ii)).

2.6 Are fashion/textile companies required by the Textile Regulation to provide information about the country of origin of their products, the manufacturer and/or the circumstances (e.g. factory working conditions) under which these products have been made, whether in the EU or in other parts of the world?

⁴ Directive 94/11/EC of the European Parliament and of the Council of 23 March 1994 on the approximation of the laws, regulations and administrative provisions of the Member States relating to labelling of the materials used in the main components of footwear for sale to the consumer - OJ L 100, 19.4.1994

No, the Textile Regulation does not lay down any such obligations to be provided on the label or marking. Nevertheless, under the Textile Regulation, businesses may, if they wish, state the country of origin and provide social and environmental information in the labelling or marking, provided it is not misleading to consumers. If the name of the manufacturer is provided, it may, and in some cases, it must, appear immediately before or after the fibre composition (Article 16(2)). If the textile products fall within the scope of the Personal Protective Equipment Regulation⁵ or of the Toys Safety Directive⁶, information on the manufacturer or importer has to be provided.

2.7 According to Annex V item 17, travel goods made of textile materials are not subject to mandatory labelling. This would include travel bags. If the manufacturer uses recycled polyester to make the bag, can the product be labelled as ‘100% recycled polyester’? Is there any specific labelling requirement for products made with recycled fibres?

Labelling or marking is not mandatory for bags falling under the ‘fancy goods and saddlery, of textile materials’ or ‘travel goods of textile materials’ (items 16 and 17 of Annex V). If a textile product is required to bear, as per the Textile Regulation, a fibre composition label or marking, the composition of the fibre(s) in question must be stated using one or more of the fibre names listed in Annex I (e.g. ‘polyester’). Under the Textile Regulation, there is no requirement to use the term ‘recycled’, but the Regulation allows manufacturers to give that information to the consumer if they wish, provided it is not misleading or deceptive for the consumer. If the manufacturer wants to give such information, it must be displayed separately (Article 16(2)), e.g. polyester - recycled fibres.

2.8 What products are considered to be corsetry/underwear? Do edgings have to be labelled? Are there products for which an overall label is enough?

The Textile Regulation does not provide a definition or a list of items that would be considered corsetry or underwear products. Article 13 lays down special rules for labelling and marking certain textile products enlisted in Annex IV, including corsetry products (specifically referred to in Annex IV (1)). Exemptions that may concern corsetry or underwear are set out in Article 17. Annex V lists textile products for which labelling is not compulsory and Annex VI lists products for which inclusive labelling is sufficient.

2.9 Apparently, the labelling of the whole product with an overall composition is allowed only for certain corsetry products (Annex IV), where the limit for small parts is also 10% instead of 30%. Do all components of an article have to be calculated in the overall composition?

According to Article 11 of the Textile Regulation, textile components which have different textile fibre contents and represent less than 30% of the total weight of the product (and are not the main linings) do not need to be labelled or marked separately. However, these components must still be included in the calculation of the fibre content of a textile product. Article 9(1) of the Textile Regulation provides that textile products have to be labelled or marketed with the name and percentage by weight of all constituent fibres, in descending order. Annex VII lists items that do not have to be taken into account in determining fibre

⁵ Regulation (EU) 2016/425 of the European Parliament and of the Council of 9 March 2016 on personal protective equipment and repealing Council Directive 89/686/EEC - OJ L 81, 31.3.2016.

⁶ Directive 2009/48/EC of the European Parliament and of the Council on the safety of toys — OJ L170, 30.6.2009

composition of textile products. You have the flexibility to decide on practical aspects of meeting these requirements. But you can only use terms such as ‘100%’, ‘pure’ or ‘all’, e.g. ‘100% viscose’, if a product is made entirely of one single type of fibre (Article 7(1)), with some exceptions set out in Article 7(2). Article 13 lays down specific labelling and marking requirements for products covered by Annex IV. The 10% threshold, which is mentioned in Annex IV, refers only to the components of certain corsetry products.

2.10 Do gloves need a label, stating size, fibre composition and care instructions, in both hands or is it enough just to label one hand of a pair?

If gloves contain at least 80% textile fibres by weight, they are within the scope of the Textile Regulation. When two gloves have the same fibre composition and are normally sold as a single unit, labelling or marking one glove is enough (Article 11(3)). In any case, the information has to be clearly visible for the consumer before they buy their gloves.

2.11 Would a reusable shopping bag (e.g. made of 100% virgin or recycled polypropylene and calcium carbonate) be subject to the Textile Regulation and the REACH Regulation⁷? What legislation applies to this product, which the consumer receives free-with-purchase?

The Textile Regulation requires textile products containing at least 80% textile fibres by weight to be labelled or marked to provide information about their fibre composition by using the fibre names listed in Annex I, notably ‘Polypropylene’ (item 37 in Table 2 of Annex I). Using brand names and other names not listed in Annex I is not enough to fulfil the requirements of the Textile Regulation to identify the fibre. Labelling and marking must be provided when the textile products are available on the market as a rule, regardless of whether they are supplied in return for payment or free of charge. However, there is an exception for certain packaging, under which shopping bags may fall, irrespective of whether they may be reused or not: in accordance with point 15 of Annex V of the Textile Regulation, packaging which is ‘not new and sold as such’ is not subject to mandatory labelling or marking. Therefore, *a contrario*, only new packaging which is ‘sold as such’ is subject to mandatory labelling or marking. Moreover, inclusive labelling is sufficient, in accordance with point 11 of Annex VI of the Textile Regulation. ‘Sold as such’ must be interpreted as not including (new) packaging sold to consumers at the point of sale of other goods or products which is supplied to package those other goods or products – for example, a new textile carrier bag supplied, for consideration, to consumers at the point of sale of other goods or products to allow for their transportation, containment, protection, handling, or presentation. Such textile carrier bag is in principle not subject to mandatory labelling or marking in accordance with the Textile Regulation. However, it is likely to be considered as ‘packaging’ under Directive 94/62/EC (currently undergoing revision) and governed accordingly in terms of recyclability and end of life treatment. Textile reusable shopping bags may also fall under restrictions on manufacture, placing on the market and use of certain dangerous substances, mixtures and articles (as provided by the REACH Regulation (EU)

⁷ Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), establishing a European Chemicals Agency, amending Directive 1999/45/EC and repealing Council Regulation (EEC) No 793/93 and Commission Regulation (EC) No 1488/94 as well as Council Directive 76/769/EEC and Commission Directives 91/155/EEC, 93/67/EEC, 93/105/EC and 2000/21/EC – OJ L 396, 30.12.2006

1907/2006 and Regulation (EU) 2019/1021 on persistent organic pollutants⁸). For further details on the requirements of REACH, contact ECHA or the nearest national helpdesk. Contact details of national helpdesks are available at: <https://echa.europa.eu/support/helpdesks>.

2.12 Regulation 1007/2011 does not specifically mention swimwear products. Do these fall under the scope of this Regulation?

As a general rule, if swimwear products are composed of at least 80% textile fibres by weight, they fall within the scope of the Textile Regulation and must fulfil its labelling and marking requirements (Article 2).

2.13 Are covers, e.g. for tablets and similar portable devices excluded from mandatory labelling? Do such covers and computer cases fall into the scope of item 17 of Annex V? How should the surface of 160 cm² measured? Are bigger covers among the items which are included in Annex V? Are rucksacks included under the scope of Annex V, items 16 and 17?

The surface of (not more than 160 cm²) referred to in point 30 of Annex V (covers for mobile telephones and portable media players) is understood as one side of the cover (length x height) and not as the whole surface of the cover. Rucksacks may fall under the ‘travel goods of textile materials’ category mentioned in point 17 of Annex V. Personal computer cases and covers for media players and other portable devices may fall under the category mentioned in 17 of Annex V.

3. FIBRE NAMES AND COMPOSITION

3.1 Different breeds of sheep provide different qualities of wool. For example, generic wool differs from selected wool such as ‘merino’. Consumers, as well as breeders and mills, would appreciate seeing the composition of knitted fibres described more precisely. Would additional labelling be possible? Could terms such as ‘Merino’, ‘Blue faced Leicester’ or ‘Wensleydale’ be used in the labelling of woollen products?

Textile products marketed in the EU need to have a fibre composition label or marking which shows the composition using the fibre names listed in Annex I. In the case of woollen products, the word ‘wool’ has to appear on the product (Annex I, point 1). Terms such as ‘Merino’ or ‘Blue faced Leicester’ are not listed in Annex I, so it is not enough to use breed names alone, without the word ‘wool’. However, the Textile Regulation does not prevent additional labelling, as long as that information is not misleading or deceptive for the consumer. Therefore, a company may provide further information on the label. If the manufacturer of woollen products wants to give additional information, this information must be displayed separately (Article 16(2)), e.g. 100% wool - merino.

3.2 Article 20(3) of the Textile Regulation states: that ‘a manufacturing tolerance of 3% shall be permitted between the stated fibre composition and the percentages obtained from analysis’. How should this tolerance be interpreted?

Labelling or marking must correctly state the name and percentage by weight of all

⁸ Regulation (EU) 2019/1021 of the European Parliament and of the Council of 20 June 2019 on persistent organic pollutants (recast) – OJ L 169, 25.6.2019

constituent fibres in descending order (Article 9). The manufacturing tolerance of 3% provided for in Article 20(3) refers to the percentage difference between the actual weight, as measured during inspections carried out in accordance with Article 19, and the weight shown on the label or marking. It is understood to be current practice of EU laboratories that the deviation registered is within the range of 30 ± 3 for 'fibre x' and 70 ± 3 for 'fibre y' for an item labelled 30% 'fibre x' and 70% 'fibre y'.

3.3 When applying for a new textile name, what steps are involved, and how long is the process likely to take?

When applying for a new textile fibre name, the steps are as follows:

1. A business submits a written application. This application must include a technical file in accordance with the minimum requirements set by Annex II, but there is no specific format or template (Article 6).
2. The European Commission begins its technical work on the proposed identification (textile fibre name) and quantification methods.
3. If this process reaches a satisfactory conclusion, the European Commission will add the new textile fibre name to the list in Annex I.

The timetable depends on the application in question. If you are considering applying for a new fibre name, you can find useful additional information at: https://single-market-economy.ec.europa.eu/sectors/textiles-ecosystem/textiles-leather-fur_en#the-textile-labelling-regulation-eu-10072011.

3.4 Two products may have the same fibre composition but with different percentages. For example, product A is composed of 40% cotton and 60% polyester, while product B is 60% cotton and 40% polyester. Could the same label be used for both?

No, all textile products must be labelled or marked with the name and percentage by weight of the fibres they are made of, in decreasing order (Article 9(1)). So you cannot use a single label for products with different proportions of two different fibres.

3.5 With regard to labelling of textile products with two or more textile parts, is it necessary to name the different textile parts on the label/mark? Should it be made clear what percentages apply to what parts? What about labelling for two textile parts with the same composition?

The Textile Regulation neither defines textile 'parts' of the textile products nor makes any reference to them. Textile parts are usually understood as a set of two or more garments, for example a suit composed of a jacket and trousers. These are however two separate textile products in the meaning of the Textile Regulation and the information on fibre composition has to be disclosed on each garment. When the textile product is composed of two or more textile components with different textile fibre content, for example a dress where the sleeves and the main body have different fibre composition, you must indicate the fibre composition of the different components if they represent 30% or more of the total weight of the textile product and are not the main lining (Article 11(1)). When two or more textile products have the same fibre composition and normally form a single unit, for example gloves, they may bear only one label or marking (Article 11(3)). You may choose where to place the label or marking (inside or outside the product), bearing in mind that labelling and marking has to be durable, easily legible, visible, and accessible.

3.6 With respect to Article 11 of the Textile Regulation (multi-component textile products), how should seamless briefs (underwear) be labelled? Can the gusset be ignored because it is less than 30% of total weight? Does the gusset have to be calculated into the composition of the whole product?

The Textile Regulation does not require to label or mark separately those textile components that represent less than 30% of the total weight of the textile product and are not main linings. All components have to be considered for calculating the fibre composition of the whole product. In the case of the products listed in Annex IV (e.g. brassieres, corsets, and other articles of corsetry), special rules apply for the marking and labelling depending on specific categories of the listed products.

3.7 To determine the fibre composition of socks: can the heel and toe parts be excluded, and labelling refer to the body part only? Or can labelling exclude only the yarns/materials that are added to the heel and toe for reinforcement?

No, the heel and toe parts shall not be excluded for determining the fibre composition. Annex VII (e) and (f) of the Textile Regulation lists items in socks (and tights) that are excluded for the determination of fibre composition. These are understood to include the stiffening and reinforcement yarns/materials of the toe and the heel. As regards the labelling or marking stating the fibre composition of such textile products, the provisions of Article 11 (multi-component textile products), in combination with Article 9 (multi-fibre textile products), apply to the products mentioned above as examples.

3.8 In which textile products can the term ‘mixed fibres’ or the term ‘unspecified fibre composition’ be used on the label or marking? Is it allowed to label for instance 30% of fibre x, 20% of fibre y and 50% of mixed fibres? Is the use of the term ‘mixed fibres’ allowed in case of known recycled fibres which percentage varies a lot from one batch to another (much more than the manufacture tolerance of 3%)?

As stated in Article 9(4), the use of these terms may be considered when it is hard to establish the composition of the products at the time of their manufacture. This applies to multi-fibre textile products. No percentage threshold has been set; this has to be assessed on a case-by-case basis.

3.9 The fibre description of item 48 (Annex I) ‘fibres obtained from miscellaneous or new materials not listed above’ may seem unclear. How should metallised polyester or polyamide be labelled? The name ‘metallised yarn’ is often used, in practice.

The term metallised is often used for fibres/yarns which are composed of metal, metal-coated textile fibre, textile fibre-coated metal, or textile fibre completely covered by metal (aluminium, copper, iron, silver, etc.). It is understood that the labelling of textile products containing metallised fibres (or yarns) is linked to how the fibres are produced: example A – X% cotton, Y% polyester, and Z% metallised fibre; example B – X% cotton, Y% polyester, and Z% polyester – metallised (or Z% metal-coated polyester); example C – X% cotton, Y% polyester, and Z% polyester-coated metal.

4. LANGUAGES

4.1 Does textile labelling need to be in the national language or languages of the EU country

where the textile product is sold? Is a label in only one of the official languages of the EU acceptable?

The labelling or marking must be in the official language or languages of the EU Member State on whose territory the product is made available to the consumer, unless the national legislation of that country states otherwise (Article 16(3)). In case of doubt, it is recommended to contact the competent authorities in the EU Member State where you plan to market your textile products to find out whether they accept labels in the official language (or languages) of another EU Member State.

4.2 Would it be a problem to create one label including all EU official languages? Is there any sample label available?

The Textile Regulation does not prevent the use of multi-lingual labels. However, there is no sample label available.

4.3 According to Article 16(3), second paragraph, when bobbins, reels, skeins, balls or other small quantities of sewing, mending and embroidery yarns are individually sold, they may be labelled or marked in any of the official languages of the EU, provided they are also ‘inclusively’ labelled. Is it enough to offer the consumer such ‘inclusive labelling’ in advertisements (e.g. on the internet, in advertising brochures, etc.)?

No, it is not enough. Information in the required official language(s) has to be affixed to the products individually sold in addition to ‘inclusive labelling’, which may be done on the internet in the case of sales made by electronic means (Article 16(1)).

5. NON-TEXTILE PARTS OF ANIMAL ORIGIN

5.1 Article 12 of the Textile Regulation requires manufacturers to state whether their textile products contain non-textile parts of animal origin. Are the uppers of footwear covered by this Article, or are they exempt under Annex V, item 23?

Under Annex V item 23, manufacturers are not obliged to label or mark the textile parts of footwear, but they may do so if they wish — provided this is not misleading for the consumer. However, the Footwear Directive 94/11/EC provides for labelling rules of main materials used in the main components of footwear, including on the three main parts (the upper, the lining and sock and the outer sole). Article 12 of the Textile Regulation applicable to textile products containing non-textile parts of animal origin does not apply to footwear, but the Footwear Directive already provides for indications of non-textile parts of animal origin (leather and coated leather).

5.2 Some textile products, such as outdoor garments, jackets, and mittens, contain down or feathers. Are down and feathers considered as ‘non-textile parts of animal origin’? If so, do such products have to be labelled ‘Contains non-textile parts of animal origin’ (Article 12 of the Textile Regulation)? Is there any exception in the case of products that contain only small parts of animal origin?

‘Non-textile parts of animal origin’ includes parts made of down, feather, bone, leather, pearl, and horn. Textile products containing such materials — even in small quantities — must be labelled or marked with the sentence ‘*Contains non-textile parts of animal origin*’ (Article 12) whenever such products are made available on the market.

5.3 Article 12 refers to the presence of non-textile parts of animal origin ‘in’ textile products. Does this refer only to cases where non-textile parts of animal origin are literally ‘in’ the textile products, e.g. fixed with a seam (such as when fur is sewn onto the textile parts)?

In Article 12 of the Textile Regulation, the word ‘in’ must be understood in a wide sense. Anything which forms part of a textile product, regardless of how it is attached, falls within the scope of Article 12.

5.4 What products and materials does Article 12 apply to?

It is understood that Article 12 is applicable to products that primarily fall within the scope of the Textile Regulation (Article 2). In this case, a labelling requirement applies to textile products containing ‘non-textile parts of animal origin’ and covers all types of materials which fulfil the condition of being ‘non-textile parts of animal origin’ (e.g. leather).

6. LABELS AND MARKINGS

6.1 If a supplier provides explanatory documentation to accompany its textile products, do those products still have to be labelled or marked?

As a general rule, the answer is ‘yes’. The only circumstances under which accompanying commercial documents can replace (or supplement) labels or marking is when the products are being supplied to businesses within the supply chain or are delivered as part of a public procurement procedure (Article 14(2)).

6.2 Does the label have to be directly attached to the product, e.g. sewn on? Is it possible to replace labels by paper-based information? Is it acceptable to attach a label made of (for example) cardboard or plastic, using a tagging device and/or nylon thread?

All labels must be firmly attached (Article 14(1)). The only circumstance under which paper-based information can replace (or supplement) labels or marking is when the products are being supplied to businesses within the supply chain or are delivered as part of a public procurement procedure (Article 14(2)). The labelling or marking of textile products has to be durable, easily legible, visible, and accessible (Article 14(1)).

6.3 According to Article 14(1) the labelling and marking must be ‘easily legible’, ‘visible’ and ‘securely attached’. Is there a stipulation as to the minimum size of the characters? Must the label always be attached to the product or could it be attached to the product’s package?

No, as there are no harmonised standards or other rules in this regard, businesses may choose which size, style, and font to use. The textile fibre composition must be indicated on labels and markings, on packaging and in catalogues and trade literature and must be clearly visible to the consumer before purchase (Article 16(1)). However, it is understood that ‘securely attached’ allows the label to be attached on the package, and not necessarily on the product itself, whenever this would inevitably ruin or damage the product.

6.4 Can a label on a mattress be put inside the packaging or does it have to be stitched on to the mattress? Is there a specific place on the mattress where the label should be put or stitched? Are labels needed for the mattress itself or just for mattress covers?

The textile components of mattress coverings made of at least 80% textile fibres by weight have to be treated as textile products (Article 2(2)(c)(ii)). Businesses may choose where to place the label on the mattress coverings, bearing in mind that labelling and marking has to be durable, easily legible, visible, and accessible, and, in the case of a label, securely attached (Article 14).

6.5 Article 14(2) provides that labels or markings may be replaced or supplemented by accompanying commercial documents when the products are supplied to businesses within the supply chain. Does this mean that in business to business (B2B), labels or markings can be replaced or supplemented by accompanying commercial documents?

Yes, B2B transactions among economic operators, as defined in the Market Surveillance Regulation (EU) 2019/1020, within the supply chain are covered by Article 14(2).

6.6 What is the difference between a label and a mark? What does this wording mean: ‘bringing the information directly on the product’? If e.g. a label is stitched with the necessary information (as it is usually for clothes, for instance) onto the product, is this defined as a label or a mark?

The definitions of ‘labelling’ and ‘marking’ are provided in Article 3 of the Textile Regulation. As explained in the definition of marking, there are different ways of putting the information directly on textile products, usually by sewing, embroidering, printing, etc. You may choose between labelling and marking; both have to be ‘durable, easily legible and accessible and, in case of a label, securely attached’ (Article 14(1)). A piece of textile or other material used to state the fibre composition and attached to the textile product would qualify as a label.

6.7 If the product is delivered to the end-consumer in a sealed polybag with a sticker stating size, fibre composition and care instructions, is it still necessary to attach a label to the product with at least fibre composition?

Yes, information about the fibre composition is still required (Article 16(1)) unless the products are listed in Annex V. However, for textile products that are only subject to the requirements of inclusive labelling (Article 17(3)) and those that are sold by the meter or in cut lengths, affixing the information to the overall packaging or the roll is enough. Care instructions and size labelling requirements of textile products are not covered by the Textile Regulation.

6.8 Manufacturers of cleaning machines use textile parts, e.g. pads or brushes made of textiles which are incorporated into cleaning machines and are necessary for the correct operation of the machine. Are these spare parts subject to labelling requirements?

No, for textiles products falling under Item 37 of Annex V, such as pads and brushes made of textile, that are normally intended for use as equipment components or for incorporation as parts, notably in machines, appliances, etc. For these textile products, one may, however, state the fibre composition, provided that the information is not deceptive or misleading for the consumer.

6.9 Do paper-based or electronic promotional materials, e.g. catalogues or folders, TV commercials and advertising leaflets, need to indicate the textile fibre composition?

The general rule is that information about the fibre composition must be made available to the consumer before the purchase (Article 16(1)). Therefore, it is understood that both paper-based and electronic promotional materials must include fibre composition descriptions in the context of a purchase or a potential purchase - the fibre composition needs to be present together with other product-related information, notably price, whenever this information enables performing a sales transaction, including telephone or online purchases. This is the case of e.g. TV commercials or advertising campaigns where the possibility of a distance purchase is made available.

7. STANDARDS

7.1 Are there specific ‘Pull Test’ standards for the strength of children’s clothing? What other standards are available for textile products?

For up-to-date information on test standards, please contact the European Committee for Standardisation CEN: <https://www.cencenelec.eu/management-centre/contact-us/>. CEN/TC 248 — Textiles and textile products — is the committee for textiles. Further information on EN standards, CEN or its national members is available at: <https://www.cencenelec.eu/about-cen/> and <https://www.cencenelec.eu/european-standardization/cen-and-cenelec/>.

7.2 Where can I buy a copy of European Women’s Standard Body Measurements?

Harmonised standards may be bought from a European Standards Organisations, for example here: <https://standards.iteh.ai/catalog/tc/cen/4d581e16-ae2e-4e82-80df-8e6a2083a60d/cen-tc-248-wg-10>. For more information on available European Women’s Standard Body Measurements, please contact CEN, the European Committee for Standardisation: <https://www.cencenelec.eu/management-centre/contact-us/>.

7.3 Are there any standard methods for pH tests on textile products in the EU? Is the standard EN ISO 3071 (textiles) applicable?

Standard EN ISO 3071 is available for determining the pH of aqueous extracts of textiles - a specimen has to be immersed in an aqueous medium and the pH of the medium measured.

8. OTHER

8.1 Is there any EU legislation about labelling leather garments and accessories such as leather jackets, leather bags, leather belts, etc. sold on the European market?

No, apart from the Textile Regulation and the Footwear Directive 94/11/EC, there is no specific EU legislation on labelling leather goods. The Textile Regulation applies to products containing leather if the products are made of at least 80% textile fibres (Article 2). If a textile product contains non-textile parts of animal origin, such as leather, the phrase ‘*Contains non-textile parts of animal origin*’ must appear on the label or marking whenever that product is made available on the market.

8.2 Since toys are exempt from mandatory labelling under Annex V of the Textile Regulation, does this mean that the term ‘toys’ includes toys for animals as well as for humans?

Indeed, toys fall within the list of textile products which the indication of textile fibre names or fibre composition on the labels and markings of textile are not required (cf. Article 17(2) and Annex V of the Textile Regulation).

8.3 Should camera straps made of textile materials bear a fibre composition label according to the requirements of the Textile Regulation?

Yes, for textile camera straps made of at least 80% textile fibres by weight which must be treated in the same way as other textile products (Article 2(2)(a)) and must be labelled in compliance with the Textile Regulation.

8.4 Is information available about the results of Commission studies on issues such as country of origin, environmental and social labelling?

Yes, the Commission has launched parallel studies on the labelling of textiles and of leather. The reports are available from: https://single-market-economy.ec.europa.eu/sectors/textiles-ecosystem/textiles-leather-fur_en#the-eu-leather-industry (leather products) and https://single-market-economy.ec.europa.eu/sectors/textiles-ecosystem/textiles-leather-fur_en#the-textile-labelling-regulation-eu-10072011 (textile products).

8.5 Consumers may buy clothes without a label on fibre composition as the information is given on the packaging or lacking (e.g. for second hand clothes, because people often cut out original labels). Is this acceptable under the labelling of Textiles Regulation?

In principle no, but it can be allowed in certain specific cases, as Article 17 of the Textile Regulation allows for derogations to mandatory labelling and marking of textile products as laid down in Articles 11, 14, 15 and 16. For instance, cleaning cloths may – as a general rule - be offered for sale in batches under an inclusive label, provided they are of the same type and fibre composition (Annex VI, item 2). In the case of products for which it is not possible to establish the fibre composition, e.g. clothes made of second hand or used clothes, consumers have to be explicitly informed that they are buying ‘old made-up textile products’ (item 13 of Annex V).

8.6 Does the Textile Regulation require CE marking of textile products?

The Textile Regulation does not require CE marking of textile products. However, certain types of products which fall under the definition of textile products, as referred to in Article 3(1)(a) of the Textile Regulation, are required to bear CE marking by other EU legislation, such as personal protective equipment in accordance with the Personal Protective Regulation (EU) 2016/425⁹, medical devices in accordance with the Medical Devices Regulation (EU) 2017/745¹⁰ and toys in accordance with the provisions of the Toy Safety Directive

⁹ Regulation (EU) 2016/425 of the European Parliament and of the Council of 9 March 2016 on personal protective equipment and repealing Council Directive 89/686/EEC (OJ L 81, 31.3.2016, p. 51, ELI: <http://data.europa.eu/eli/reg/2016/425/oj>)

¹⁰ Regulation (EU) 2017/745 of the European Parliament and of the Council of 5 April 2017 on medical devices, amending Directive 2001/83/EC, Regulation (EC) No 178/2002 and Regulation (EC) No 1223/2009 and repealing Council Directives 90/385/EEC and 93/42/EEC – OJ L117, 05.05.2017

2009/48/EC¹¹. Construction products that are concurrently textile products, such as geotextiles, are subject to particular rules on CE marking in accordance with the Construction Products Regulation (EU) 305/2011¹².

8.7 Are there different national provisions regarding textile labelling in EU Member States? If not, how can we find out how Member States apply these textile labelling provisions?

The Textile Regulation harmonises labelling and marking of fibre composition of textile products and, therefore, no other additional Member State rules should be provided for the same subject matter, except expressly provided for by the Regulation (e.g. in relation to the language in which labelling and marking should be provided, as per the first subparagraph of Article 16(3)).

To find out whether Member States have additional textile product labelling or marking requirements or recommendations on subject matters other than fibre composition, please contact the authorities of the Member State where the textile products will be marketed. A list of market surveillance authorities, including for ‘sector 32 – Textile and Footwear Labelling’, is available here: <https://ec.europa.eu/docsroom/documents/52495> .

Information is also available from a study on possible new labelling requirements of textile and clothing products carried out by the European Commission. The study analysed voluntary schemes and current practices in several Member States; the findings are available at <https://ec.europa.eu/docsroom/documents/10480?locale=en> – however, this study refers to the situation in Member States in 2012.

¹¹ Directive 2009/48/EC of the European Parliament and of the Council of 18 June 2009 on the safety of toys (OJ L 170, 30.6.2009, p. 1, ELI: <http://data.europa.eu/eli/dir/2009/48/oj>)

¹² Regulation (EU) No 305/2011 of the European Parliament and of the Council of 9 March 2011 laying down harmonised conditions for the marketing of construction products and repealing Council Directive 89/106/EEC - OJ OJ L 88, 4.4.2011

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