THE STAKEHOLDER GROUPS

Group 1 — The Supply Chain (Producing Industry)
Tier 0 Brands & Retailers — Tier 1 Finished Manufacturers — Tier 2/3 Processors & Component Manufacturers — Tier 4 Raw Material Producers
•Answer from what you actually do, not what you think should happen.
•Tell us which part of the supply chain you work in — it helps us read your answers.
•Concrete examples and honest accounts of what does not work are just as useful as success stories.
•If something depends on your suppliers or buyers rather than on you, say so.

The Supply Chain (Producing Industry)

Group 2 — Circularity and End-of-Life Operators
Collectors — Sorters — Recyclers — Repair & Reuse Services
•Tell us what information you would need from a product passport to do your job better.
•You don't need to know how upstream production works — focus on what you receive and what is missing.
•If part of a question doesn't apply to your work, describe what you do know about it.

Circularity and End-of-Life Operators

Group 3 — Technology and Data Enablers
DPP Service Providers — Tech Companies — Certification & Audit Bodies — Consultants
•Answer from your experience with real systems and implementations.
•Be direct about what is technically ready and what is not — and at what scale.
•Draw on comparable sectors where relevant. No need to avoid examples, but don't name specific commercial products.

Technology and Data Enablers

Group 4 — Governance, Policy, and Civil Society
Public Authorities — NGOs & Industry Associations — Researchers & Academics
•Answer from a broader perspective: what conditions need to be in place for this to work at sector level?
•Use evidence or observations from your work where you can.
•If you represent a particular group or interest, it helps to say so.

Governance, Policy, and Civil Society

Composition & Chemical Safety

What does a product actually need to tell us about what it is made of — and how reliably can that information travel up and down the supply chain?

From 2027, every textile product passport must include what the product is made of — including how much recycled material it contains, whether it contains any harmful substances, and whether it sheds plastic microfibers. This information needs to come from somewhere in the supply chain. In your experience, where does it actually exist today, and what would it take to make it reliably available for a product passport?

JRC 2026

Mandatory from 2027 (Phase 1): The DPP must state **fibre composition**, the **share of recycled material**, the presence of any **harmful substances**, and whether the product sheds **plastic microfibres**. **Substances of concern** under REACH and the ESPR must be named, located within the product where relevant, and accompanied by **handling instructions** for recyclers and end-of-life operators.

The data must be accurate and structured — not a vague percentage. It must travel at **product or batch level**, with the manufacturer responsible for ensuring it is verifiable. Third-party certifications can support but do not automatically satisfy the requirement.

Note: a standardised test method for microplastic shedding is still in development. Requirements in this area may be revised once it is finalised.

Can we get reliable data on what a product is made of, all the way back to the raw material?

Fibre content

Dyes & finishes

Chemical treatments

Recycled share

Test method

Harmful substances

Data responsibility

Verification

REACH compliance

Oeko-Tex

Microfibre shedding

Supplier declarations

Molecular analysis

Cascade of information

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Supply Chain Traceability

How ready is the textile industry to say, with confidence, where each production step happened — and what would need to change for that to become standard practice?

Product passports will need to show where the main production steps took place — things like where the fabric was woven, dyed, printed, or the garment sewn together. This sounds straightforward, but in a global industry with many layers of suppliers, it can be anything but. How close is the industry to being able to do this reliably by 2027, and what are the real obstacles?

Example:
Italian yarn is originally from all different countries. How should we disclose this?

Material is the same.

Closed ecosystems

B2B vs. public access

Trust between actors

Certification gap
how to get the read

Digital infrastructure

Data originator

JRC 2026

Mandatory from 2027 (Phase 1): The DPP must indicate where the main **production steps** took place — at minimum **cutting and sewing, weaving, knitting, dyeing, printing**, and relevant wet processes such as tanning. Country level is the baseline; **facility-level identification** is the direction of travel.

Each actor in the chain is either a *data originator* or a *data maintainer*, with differentiated **access rights** — location data may be public, while process details and supplier identities can be protected as commercially sensitive.

Location data declared at manufacture sits in the static **Core DPP**. Updates are appended to the **Life-cycle Log** by authenticated actors only.

Production location

How ready is the industry to say where each production step happened?

Data handover

Chain of custody

Tier transparency

SME capacity

Confidentiality

Supplier readiness

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Recyclability

What information does a product passport actually need to carry to make it useful for recyclers and sorters — and is a single recyclability label even the right format?

Every product passport will need to say whether a product can be recycled. But ‘recyclable’ is not a simple yes or no — it depends on what the product is made of, how it was constructed, and whether the right infrastructure exists to actually process it. Who should determine recyclability, what should that claim be based on, and how detailed does the information need to be to be genuinely useful?

Recyclability definition

Mono-material

Binary vs. nuanced label

CEN standards

Garment condition

2030 horizon

Elastane content

Bill of Materials

Binary label or detailed breakdown: which is actually useful?

Recyclability index

Sorter perspective

Dye & finish disclosure

Fibre blend complexity

Mechanical recycling

Chemical recycling

JRC 2026

Mandatory from 2027 (Phase 1): The DPP must state whether the product **can be recycled** and what **end-of-life options** are available, including collection points and take-back schemes. The regulation does not yet prescribe the format or depth of the recyclability claim.

The JRC references EN 45555:2019 for assessing recyclability — working material by material, accounting for **homogeneity and ease of disassembly**. For textiles, a single binary label is considered insufficient.

The ESPR also **bans destruction of unsold products**. Recyclability data will therefore be used to enforce disposal obligations, not just inform consumers. Recyclability indicators for recycled products are a **post-2027, 2030-horizon** development.

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Packaging

How do you attach packaging information to a product passport without conflating two different data stories — and how much of this is realistically achievable by 2027?

The product passport also needs to cover the packaging: whether it contains recycled material, whether it can be recycled, and whether it can be reused. Packaging is often managed separately from the product itself — by different teams, in different systems — and it typically disappears long before the product does. How should this information be captured and connected to the product passport in a way that is practical and doesn't create confusion?

Recycled content

Data owner

Separate data object

Packaging vs. product

Minimal packaging

Practical impact

Reusability

How do you attach packaging data to a product passport without mixing up two different stories?

Proportionality

RFID on packaging

Recyclability

LCA integration

Phase 1 scope

JRC 2026

Mandatory from 2027 (Phase 1): The DPP must include information on **recycled content** in packaging, whether it can be **recycled**, and whether it can be **reused**.

Packaging data will most likely appear embedded in the **product-level LCA** rather than as a separately structured data object — a challenge given that packaging frequently changes independently of the product.

When packaging is removed from the product, its contribution to the LCA **remains**, but its active role in the passport ends. Who governs this distinction in an open source system is an open design question.

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Environmental Footprint

Is collecting reliable transport and footprint data across a complex, multi-country supply chain actually achievable by 2027 — and if not, what approximations are defensible?

Beyond the mandatory fields, product passports are encouraged to include basic environmental data — how heavy the materials are, and how far they travelled between production steps. For most textile products, materials cross multiple borders before they become a finished garment. Tracking every leg of that journey, product by product, is a significant ask. Is it realistic for 2027, and if not, what could work instead?

JRC 2026

Mandatory from 2027 (Phase 1): The DPP must include evidence of **product safety** and, where available, **material weight** and **transport distances**. A full **carbon footprint** and **material footprint** are required under ESPR Annex I, calculated using the **PEF method**. **Microplastic release** during relevant lifecycle stages is also required where applicable.

Location disclosure is the practical starting point — once production locations are known, **transport distances can be approximated**. Where supplier-specific data is unavailable, **default or average data** may be used initially as a proportionate starting position.

The system must accommodate **three access tiers**: an aggregated score for consumers, a disaggregated breakdown for B2B buyers, and underlying LCA data for authorities — without exposing sensitive supplier information publicly.