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?

"Composition data depends heavily on product type. For high-end fashion the needs are different than for medical textiles. As a minimum: material composition, REACH certificates, absence of harmful chemicals, an environmental impact figure, where it was tested or calculated, where the product was made, and whether that facility meets safety standards."

"My suppliers — the yarn makers — should provide the information. They in turn need it from the fibre producers. Whoever adds the colour should certify the chemical components and confirm the fibre origin."

"Material verification will require more time than 2027 allows. Certification bodies will need to be integrated into automated data flows — that is a few years away yet."

"Reliable data all the way to raw material is achievable — as long as every transaction is legally tracked. Financial data already travels with transactions; if digital invoices begin carrying product IDs or DPP references, the chain becomes traceable."

"With modern AI, authorities will have an easier time detecting anomalies and verifying that certifications are consistent throughout the chain."

"The 'plastic microfibre' discussion needs a proper test method before it becomes a DPP requirement. The hype is ahead of the science."

"Precise composition should appear — like in food and cosmetics — not a vague percentage. The DPP should also communicate the harm to the environment and what a user can do about it: wash less, wash cooler, use a filter, repair before discarding."

"The data needs to be accessible via a QR code or RFID that stays with the garment. We also need a way to read that at scale — potentially AI-assisted."

"As a recycler, we need the composition of all garment parts, plus an Oeko-Tex 100 on the complete product. Only then can we confirm there are no hazardous chemicals and that the garment is REACH compliant. This information is currently not reliably available."

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

Very easy to do if you're an honest supplier; my main concern is how this will be audited, because this is the part of the process where a lot of greenwashing is happening .

Recycled share

After use the content will be mixed, so how can we identify the content to be from our virgin or previous recyled materials?

See my comment on molecular analysis; contamination is hard to single out for (mechanically) recycled fibers

Harmful substances

Chemical treatments

What about the finishes of the yarns?

Dyes & finishes

Test method

Data responsibility

Verification

Verification processes are obscure. A consultant and a verifier can take several thousands euros and there would be no evidence of chemicals used or not used. The suppliers can give approximate info, or lie, or not reply about chemicals used. How can we change this process and make it leaner and more binding for suppliers?

REACH compliance

Oeko-Tex

I consider this the bare minimum and don't think that certification bodies with an own agenda can be trusted enough

origin of fibre?

Microfibre shedding

That also depends on how people treat/use the end product, how and how often it's washed, etc.

Molecular analysis

This one's difficult for recycled fibers: you can't get exact data on contamination and composition on a molecular level unless you scan each item in the recycling plant, which is very time consuming and costly.

Supplier declarations

Material suppliers can also no garantee the content, certainly on pre- or post recycled content

Cascade of information

Biocompatibility info

The Supply Chain (Producing Industry)

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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?

"Many of my suppliers genuinely do not know where their suppliers sourced the fibres. Some are better than others — certified schemes like RWS seem to improve visibility. But we are still getting there."

"The industry is technically capable of providing traceability data. The question is whether consumers and regulators are ready to actually use it once it is there."

"Recyclers and brands speak different languages: recyclers work in kilograms, brands in pieces and seasonal timelines. Certifications issued by recycling industry bodies are not recognised or understood by brands. This communication gap is a structural barrier to traceability."

"Transparency is not happening because the post-consumer textile space is a closed ecosystem — largely family-owned businesses competing with each other. Information has always been treated as a competitive asset. There is a genuine need to share more, including with public authorities."

"The supply chain has historically used confidentiality to obscure unfair labour practices and potentially illegal chemical processes. A decade of ESG disclosure requirements has not changed this fundamentally. The hope is that DPP is the first instrument with enough regulatory weight to actually produce reliable, structured data."

"For SMEs with limited product lines, the cost of DPP compliance must be proportionate. Governments may need to regulate DPP provider pricing — otherwise the compliance burden will fall disproportionately on smaller actors."

most of our customers do not want to share they work with us

B2B vs. public access

There should actually be a benefit for suppliers to be displayed on DPP, especially if the product is good quality (other producers can use their expertise)

Closed ecosystems

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

Material is the same.

Trust between actors

how can product info stick to the garment throughout its 2nd life journey?

Certifications are one of the biggest threats of innovation in my opinion. They're great if you mass produce, but production on demand doesn't work, because then you need to certify each production batch.

Certification gap
how to get the read

Digital infrastructure

Data originator

The data handover should be organised similar to the Textracer method, where the data is most reliable going form one tier to the next

Data handover

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?

Chain of custody

Tier transparency

Transparency implies that the reader can interprete the info. For recycling companies that is other (more specific) info than for consumers. Each garment producers needs to have a complete Bill of Materials and a specification for each fabric or trim in the garment. There is social and chemical compliance follow up needed on factory and product level.

Confidentiality

As a frontrunner in the industry it's sometimes difficult to be open about all suppliers. On one hand I want the industry to become more circular, on the other hand you want some competitive advantage and not share the names of your suppliers. Country of origin is fine, exact name of the suppliers is more difficult.

You don't want to give a chance to your suppliers to get more business?

that's exactly the paradox I addressed in my original comment. You want that, but on the other hand suppliers sometimes start to compete with your business, for instance by implementing a vertically integrated supply chain, and offering the end product cheaper than you can if you order raw materials from them.

SME capacity

most of our customers do not want to share they produce with us.

Supplier readiness

The suppliers outside EU also need to adopt the DPP at some point, so that the information passed is verified automatically (i.e. between the chinese dpp provider and tex.tracer)

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Recyclability

"We are running in a circle: recycling capacity is not there yet, so there is no urgency to collect the data, so the data is not there when the capacity arrives. Knitters are probably the best-placed actors in the chain to provide accurate composition data for the final product — we know what is in it."

"A scale from 1 to 100 that indicates recycling complexity could be more useful than a binary recyclable/not recyclable label."

"If a product is technically recyclable, it will be recycled. If it is not — multi-layer construction, high elastane content, PPE — it almost certainly will not be. That distinction is more useful than a vague recyclability label."

"The biggest barrier for a recycler is not knowing what dyes and finishes were applied to the input garments. A mechanical recycler needs this to confirm the output has no hazardous substances. A chemical recycler needs it to optimise the process."

"I have been trying to work with the CEN definition of 'recyclable' and I cannot produce a definition that is actually workable in practice. Beyond composition, the current physical condition of the garment matters — whether the fabric can still withstand the mechanical stress of a recycling process."

"Recyclability effectively means near-pure or mono-fabric construction with low synthetic content. That is the practical reality for now."

"When Digital Material Passports begin to be generated at end-of-life, recyclability indexes should become the object of dedicated research and pilots."

"A recyclability index will only become meaningful once the first DPPs for recycled products exist — probably not before 2030. In the short term, what sorters and recyclers actually need is detailed Bill of Materials information, including chemical usage during coating and dyeing. That data exists but is treated as confidential."

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

should we not look more into actual life cycle estimation?

Do you design for end of life? do you know who recycles your products?

The product label should be unique as much of possible and refer to the dpp or m-dpp. Same applies to material (which also can be labeled and traced into the BOM)

Binary vs. nuanced label

CEN standards

Garment condition

2030 horizon

Mono-material

Elastane content

This could be calculated using the BoM but not all recyclers can get the same recycled content (weight) out of the same item

Bill of Materials

Recyclability index

Binary label or detailed breakdown: which is actually useful?

Sorter perspective

Dye & finish disclosure

Fibre blend complexity

Mechanical recycling

Chemical recycling

The PRO/EPR orgs really need to start "easing" the costs for collectors, sorters, and recyclers, together with other policy interventions that make it easier for them to hire local labor. Otherwise, we will just continue exporting lots of unsorted textiles or incinerating more than 60%.

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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.

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?

"If we want to reduce the administrative burden, the answer might simply be to reduce packaging — fewer items needing a passport."

"Packaging should carry its own label or identifier — this is already starting to happen. Linking it to the product passport risks creating confusion between two separate data objects."

"For products without a care label — socks, gloves, accessories — the packaging is the only carrier for product information. An RFID in the packaging could work. At high volumes, the cost is around four cents per unit, which is manageable."

"Honestly, packaging is a small fragment of a garment's total environmental impact. The attention it receives in regulatory discussions is disproportionate to its actual significance."

"By 2027, packaging will likely only appear in the DPP as part of an LCA dataset — not as a separately structured data object. Automatic transfer of packaging information between supply chain actors is probably a post-2027 development."

"If packaging carries its own DPP and each transaction references a product ID, the data can flow without major friction. When packaging is removed or changed, it can be detached from the product description — but it should remain in the LCA."

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.

Recycled content

Data owner

Separate data object

Packaging vs. product

Often packaging impact is tiny for textile products (below 1-5% of the impact)

Minimal packaging

Practical impact

This is an issue, because of the packaging has an RFID attached and become less recyclable. Declathon, Hema, Uniqlo has all textile products now with RFID. There are RFID threads which is more logical to use

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

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Environmental Footprint

"Transport impact data is something I would genuinely like to know. And it is data we could actually provide without too much difficulty."

"I prefer not to answer this one — it is outside my area of expertise."

"The effect of transport should be captured in the product LCA and in company-level scope 1, 2, and 3 data. If transport is not a dominant part of the footprint, using average figures may be reasonable. For products made from recycled content that are not part of seasonal collections, air freight is rarely an issue."

"My suggestion: the garment producer at the sewing stage records the country of origin for each fabric component — where it was woven, dyed, and assembled. That basic information, from harvesting to final sewing, allows a reasonable estimate of the most impactful stages of the chain."

"For 2027, it would already be a significant achievement if a number of EU companies could automatically append transport data to the DPP — for example, wholesalers recording the distance between an EU supplier facility and their distribution centre."

"If suppliers outside the EU are required to disclose transportation routes and modes, the data becomes precise. Otherwise it remains approximate — which may be acceptable, since transport typically represents less than five percent of total product impact even in long-haul scenarios."

"Once geographic locations are disclosed, transport distances and their environmental impact can be approximated with reasonable confidence. What matters most is knowing the locations — countries have very different energy mixes, and that variation drives emissions differences far more than transport distances alone."

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?

Average data

for production tier this is easier, then the raw material, for distance and transportation methods.

Phase 1 realism

Material weight

Supplier disclosure

Data approximation

LCA

PEF method

Is collecting transport distance data across the supply chain realistic by 2027?

Carbon footprint

Energy mix

Geo-location

Transport distance

challenge: differences within a batch

Scope 1/2/3

Country of origin

Non-EU actors

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.

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