

## Reusable by Design

*RREUSE's feedback on the 3rd milestone report of the preparatory study on ecodesign for textile apparel*



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The Ecodesign for Sustainable Products Regulation (ESPR) provides a unique chance to increase the circularity and sustainability of textile products. The EU Commission's Joint Research Centre (JRC) recently published the 3rd milestone of its preparatory study on ecodesign for textile apparel.<sup>1</sup> The study includes proposals for several design options (DOs), to which RREUSE provided detailed feedback.<sup>2</sup>

Overall, we are concerned by the predominance of information requirements over performance requirements, which shifts the burden of the transition on consumers rather than producers. Furthermore, the JRC study analyses aspects of durability, reparability and recyclability without considering their impact on the reusability of textile apparel beyond the first use, e.g. as second-hand items. Integrating reusability as an objective horizontally across DOs would strengthen the case for several requirements. Moreover, the requirements across DOs are proposed following a categorisation of textile apparel products that differentiates between woven and knitted fabrics. While we generally agree with this approach, a higher granularity across garment types and between natural and synthetic fibres would allow to set appropriate requirements instead of settling for a lowest common denominator.<sup>3</sup>



Social enterprises play a key role in the European textile sector. RREUSE members across Europe have pioneered circular textile management through reuse, repair, and recycling, generating inclusive local employment while preventing waste generation by extending product lifecycles. However, the experience of our network shows how growing textile waste volumes and increasingly low-quality disposable clothes, symptoms of overproduction and overconsumption, make it difficult to reuse, repair, and recycle.

## Durability - intrinsic and extrinsic

DO1 aims to increase the physical durability and, therefore, the lifespan of textile apparel, an extremely necessary objective. The JRC argues that physical durability is difficult to address given the lack of standards for measuring product performance over time and suggests using robustness as a proxy, which we believe is justified for the purpose of setting ecodesign requirements. Increasing the robustness of clothes keeps them in use for longer by preventing failures and makes them more reusable once they are donated or discarded. Robustness is defined by the JRC as the combination of key parameters such as dimensional change, spirality, and visual changes e.g. colour fastness, to be assessed through five wash-dry cycles. Other important factors, such as abrasion resistance, tear resistance, seam strength, and wear pilling, were not included.

We regret that the JRC only proposed an information requirement on robustness, in the form of a robustness score for textile apparel products. There is ample evidence showing performance loss and physical failures are leading causes of disposal of textile products, and crucial factors determining

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1 Joint Research Centre (2025) Preparatory Study on Textiles for Product Policy Instruments: 3rd milestone. European Commission, Seville. (Available [here](#)).

2 RREUSE (2026) Feedback to the JRC questionnaire on the 3rd milestone of the preparatory study on ecodesign requirements for textile apparel. (Available [here](#)).

3 See our detailed proposal for a more granular classification of textile apparel products according to garment type and fibre composition, while retaining the proposed fabric split between woven and knitted. Such classification allows to set appropriate thresholds for performance requirements across all DOs.



the reusability of textile collected and sorted for reuse.<sup>4</sup> We strongly believe DO1 should not only focus on empowering consumers to purchase more durable products. Above all, it should uphold the ESPR's objective of making sustainable products the norm by establishing minimum requirements that cut the worst-performing products out of the market. The burden of the transition should not be on consumers to purchase more robust products; it should be on producers to produce them. As such, performance requirements on robustness are more appropriate, predictable, and effective than information requirements.

Recommendations	Why?	How?
<b>Add key parameters to the definition of robustness.</b>	Abrasion and tear resistance, and seam strength are crucial factors to prevent physical failures leading to disposal and preventing reuse. Wear (dry) pilling is different from pilling due to washing. The proposed definition of robustness appears, therefore, incomplete without these parameters.	Adapt the definition of robustness and the key parameters by adding abrasion resistance and wear (dry) pilling, and adapting seam smoothness to include seam strength. Differentiate these parameters by product and fibre type, and categorise them more granularly.
<b>Increase wash-dry cycles for testing of key parameters.</b>	Five wash-dry cycles are often insufficient to deliver useful results on several parameters linked to e.g. dimensional change and spirality. <sup>5</sup>	Increase the number of wash-dry cycles for testing to at least 10 for garments made from natural fibres and 30 for garments made from synthetic fibres.
<b>Propose a performance requirement on robustness.</b>	Minimum performance requirements are essential to uphold the principles and objectives of the ESPR. Increased robustness directly contributes to delaying disposal and improving the reusability of textiles, extending products' service lifetimes.	A performance requirement on robustness should take into account key parameters and establish related minimum thresholds, separately and combined as a score/grade. <sup>6</sup>  The parameters and thresholds could be differentiated by product type.

Beyond physical durability, we reiterate the importance of addressing extrinsic factors that influence durability, which are essential to tackling overproduction and overconsumption of textiles. When products are discarded for reasons beyond physical failure, it is usually because of emotional factors. These factors are connected to current production and commercial practices, which in today's textile market are largely linear and geared towards massive production volumes at low cost, characterised by rapid collection and product replacement cycles. While improving intrinsic durability is necessary, it is insufficient if garments are produced in large volumes and systematically replaced. Recent policy

4 Piippo, Niinimäki, & Aakko (2022) Fit for the Future: Garment Quality and Product Lifetimes in a CE Context. Sustainability, 14(2), 726. (Available [here](#)); and Cooper, Tim & Claxton, Stella (2022) Garment failure causes and solutions: Slowing the cycles for circular fashion. Journal of Cleaner Production. 351. (Available [here](#)).

5 Öko-Institut (2026) Ecodesign for Sustainable Products Regulation: requirements for the ecodesign of textiles and the possible transfer to an ecodesign label. German Environment Agency. (Available [here](#)); and IFTH & ADEME (2025) DURHABI: étude de la durabilité physique des articles textiles. (Available [here](#)).

6 See our detailed feedback for a proposal on a performance requirement on robustness with minimum thresholds for key parameters, differentiated by product category and fibre type.



initiatives already demonstrate that such extrinsic drivers can be addressed through regulation. For example, the French and Italian anti-fast-fashion laws aim to penalise marketing practices that encourage overconsumption, notably by evaluating the number of models placed on the market within a given timeframe.<sup>7</sup> By targeting fast-fashion strategies that rely on high production volumes and the continuous release of new items, these approaches seek to reduce artificially accelerated consumption cycles that undermine the potential lifespan of garments.<sup>8</sup> At the EU level, similar mechanisms could be explored to complement ecodesign requirements on product design.

Recommendations	Why?	How?
<b>Integrate extrinsic durability</b> in ecodesign requirements.	Consumption patterns affecting emotional durability are influenced heavily by production practices, and changing the former requires firmly addressing the latter. Systemic change in the textile industry calls for regulatory action to tackle excessive production volumes, commercial practices fuelling perceived emotional obsolescence, and repair costs over replacement costs.	Information and performance requirements should introduce thresholds and disclosure requirements on the number of new items, models, and/or collections placed on the market annually, and require transparency on product turnover rates and other relevant information and data.

## Repairability

The JRC does not include a DO on the repairability of textile apparel, and describes textile repair as an issue linked to skills and price. While the price of repair is indeed a major barrier for consumers to choose repair over replacement, it ignores the reality of the reuse sector, where repair skills are present, and preparing for reuse often involves repair operations. Social enterprises across Europe already perform repairs on textile apparel items for resale after a preparing-for-reuse process. However, the barriers they encounter for repair are often linked to product design. When items are collected and need repair, or when consumers seek repair services, the issue is often linked to common faulty parts such as zippers, buttons, seams, fasteners, and belts.<sup>9</sup> When these components are not easily removable and replaceable, they constitute barriers to repair. Often, these barriers translate into high costs to repair items for reuse or resale, especially compared to the often low cost of replacement.

<sup>7</sup> Senato della Repubblica (2025) DDL S. 1690. (Available [here](#)); and Assemblée Nationale (2025) Proposition de loi n°1557 visant à réduire l'impact environnemental de l'industrie textile. (Available [here](#)).

<sup>8</sup> Coalition Stop Fast-Fashion (2026) Fast-Fashion vs Ultra Fast-Fashion: le faux duel qui détourne des vrais enjeux. Enquête inédite au sein des ressourceries. (Available [here](#)).

<sup>9</sup> Collected textile items that need repair - thus excluding items that are discarded for reasons such as discoloration, dimensional change and other factors linked to durability - very often show either accidental damage (e.g. holes) or seam/trim failures (zips, buttons, seam holes). See Öko-Institut (2026) Ecodesign for Sustainable Products Regulation: requirements for the ecodesign of textiles and the possible transfer to an ecodesign label. German Environment Agency. (Available [here](#)); and Bauer, Watson, Gylling, Remmen, Hauris Lysemose, Hohenthal and Jönbrink (2018) Potential Ecodesign Requirements for Textiles and Furniture. Nordic Council of Ministers. (Available [here](#)).



Recommendations	Why?	How?
<p><b>Include a DO on reparability and develop performance requirements</b> on removability, replaceability, and availability of common faulty spare parts.</p>	<p>Ensuring access to spare parts may also imply a certain degree of material or component standardisation across collections, to avoid overstocking problems. This should be valued positively as it allows for the repair of broken items with compatible spare parts and extends the service lifetime of items.</p>	<p>Repairability requirements should be formulated for the most common faulty parts that affect product functionality, such as zippers, buttons, seams, fasteners, belts etc., requiring ease of disassembly, replaceability with commercially available spare parts, and potentially availability of spare parts to independent repairers for certain product categories.</p> <p>These performance requirements could either be set horizontally, for basic provisions applicable to more product types, or vertically according to product categories, e.g. regarding availability of spare parts to independent repairers and/or end users for a certain minimum amount of time, depending on the expected lifetime of the product.</p>

Moreover, establishing reparability requirements for textile apparel should also lead to the inclusion of this product group in the scope of the Common Rules promoting the Repair of Goods.<sup>10</sup> By virtue of this inclusion, consumers should then be able to find and access repair services (including independent repairers) across their region through the European Repair Platform. This would provide consumers with more choices for having their clothes repaired, and support independent repairers, including social enterprises and other SMEs across Europe. Benefits would span across the environmental, social and economic dimensions, through reduced waste generation, increased local job creation in the repair sector, and reduced repair costs for consumers and reuse operators.

## Recyclability and recycled content

DO2 aims to increase the share of products sent for recycling. At the product level, this means establishing requirements on the recyclability of textile apparel, and the JRC proposed an information requirement. We are concerned with this proposal for several reasons. Telling consumers a textile item is “recyclable” through a score could lead them to believe that the item will be recycled when it is disposed of. In reality, these are two different issues, the latter depending on the existing recycling infrastructure and technologies, which the average consumer has no knowledge of. Moreover, consumers seeing a recyclability score at the point of purchase might be encouraged to think purchasing and disposing of “recyclable” clothes is more acceptable and therefore be more inclined to consume more and dispose of these items more quickly. These unintended effects should be carefully considered, as they could have real consequences for overconsumption and waste generation. This also demonstrates the pitfall associated with prioritising information requirements over performance requirements.

<sup>10</sup> Annex II of the Directive on Common Rules promoting the Repair of Goods lists EU legal acts laying down reparability requirements for products e.g. ecodesign regulations. See European Commission (2024) Directive (EU) 2024/1799 of the European Parliament and of the Council of 13 June 2024 on common rules promoting the repair of goods and amending Regulation (EU) 2017/2394 and Directives (EU) 2019/771 and (EU) 2020/1828. (Available [here](#)).



Recommendations	Why?	How?
Include <b>performance requirements on recyclability</b> , focusing on elastane and material blends or monomaterial shares.	Information requirements alone shift the burden onto consumers instead of regulating unsustainable practices. Elastane and heterogeneous materials are major disruptors of textile recycling. For example, elastane content in a share of over 10% affects mechanical recycling, and over 3-5% affects chemical recycling.	Existing research already identified and proposed potential requirements and thresholds. <sup>11</sup> A requirement for multi-material products could consist of no more than two different materials in one surface layer. As current technologies for automatic fibre detection reliably detect materials starting at 5-10%, an elastane threshold of 5% to 10% is proposed as a performance requirement. We argue this threshold could be lower, especially for fashion (not functional nor technical) clothing that can generally comply with extremely low levels - or absence - of elastane without impairing functionality or comfort. A product type classification system offering greater granularity would allow for appropriate thresholds per product category.

DO3 aims at increasing recycled content in textile apparel. We welcome the JRC's approach of proposing performance and information requirements on this aspect. However, some improvements are necessary to provide concrete support to the reuse and waste textile sector, which is currently facing a crisis due to increasing volumes of post-consumer textile waste collected, insufficient funding and demand for waste to be recycled, and decreasing quality of textile apparel for reuse.<sup>12</sup> In light of this, post-consumer textile waste recycling should be supported and incentivised through measures to increase the recycling content of textile apparel products.

Recommendations	Why?	How?
Prioritise recycled content from <b>post-consumer textile waste</b> .	Stimulating demand for post-consumer textile recycling is essential to alleviate the pressure under which the reuse and waste textile sector is currently operating due to overproduction.	Preference can be given to post-consumer textile waste through a threshold in the proposed performance requirement.
<b>Exclude PET bottles</b> from the sources for recycled content.	The inclusion of PET bottles as recycled content feedstock would seriously undermine the demand for recycled fibres coming from textile waste and therefore make no contribution to reducing waste generation.	Amend the definition of recycled content to only include recycled fibres coming from textile waste.

<sup>11</sup> Öko-Institut (2026) Ecodesign for Sustainable Products Regulation: requirements for the ecodesign of textiles and the possible transfer to an ecodesign label. German Environment Agency. (Available [here](#)).

<sup>12</sup> RREUSE (2025) Addressing the second-hand textile crisis. (Available [here](#)).



## Extended producer responsibility (EPR) and ecodesign

Product policy must go hand in hand with waste legislation to ensure consistency. The JRC suggests linking the ecomodulation of EPR fees paid by producers to ecodesign criteria on robustness, recyclability, and recycled content to incentivise better production. While we agree with this approach, we stress that ecomodulation has so far proven largely ineffective in promoting ecodesign and sustainable production, primarily due to the minimal financial incentives/steering effect it provides. To truly drive change, ecomodulation should first be decoupled from the EPR cost coverage fees. Additionally, the ecomodulated fee should be based on both product performance and the commercial practices of producers.<sup>13</sup> This is especially relevant for tackling extrinsic factors that contribute to textile durability beyond the physical characteristics of apparel items.

Recommendations	Why?	How?
Require <b>information on production practices</b> as criteria for ecomodulated EPR fees.	The revised Waste Framework Directive (WFD) provides explicit legal grounds for framing extrinsic factors linked to durability as affected by production practices. It encourages the adoption of EPR ecomodulation criteria based on industrial and commercial practices. To ensure consistency with the revised WFD, production volumes, collections / product range width, and launch frequency, and other parameters linked to production and commercial practices must be disclosed and regulated.	Information on production volumes, number of new items, models, or collections placed on the market annually, product turnover rates, and related data should be required via ecodesign requirements, to enable ecomodulation of EPR fees under the revised WFD beyond solely product characteristics.  Information on product lifespan as derived from robustness parameters, serving as a proxy for physical durability, and from commercial practices, influencing emotional durability, should be used for ecomodulation of EPR fees, in line with the revised WFD.

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<sup>13</sup> The revised WFD in Article 22c 3a encourages Member States to require producer responsibility organisations (PROs) to modulate the financial contribution “based on producers’ practices [...], based on the product life span resulting from such practices, the length of the useful life of the mentioned products beyond the first user, and the contribution to close the loop of the mentioned products, by turning waste textiles into raw materials for new production chains.” See European Commission (2025) Directive (EU) 2025/1892 of the European Parliament and of the Council of 10 September 2025 amending Directive 2008/98/EC on waste. (Available [here](#)).



RREUSE is Europe's largest network of social enterprises active in the circular economy, with a focus on reuse, repair and recycling. Our mission is to empower, represent, and support the social and circular enterprise community. We help drive its development through effecting positive change in European policy, facilitating the exchange of best practices, and fostering meaningful partnerships.

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