

THE BRANDED CLOTHING SECTOR URGES CAUTION ON ADDITIONAL FEEDSTOCK REQUIREMENTS

June 2026

The European Branded Clothing Association (EBCA) recognises the important role that biotechnology and bio-based solutions can play in supporting industrial decarbonisation. However, EBCA is alarmed that the European Commission is considering including the textile apparel sector as a potential “lead market” to create demand for bio-based feedstock or captured emissions (CCU) for end products in the Biotech Act II.

EBCA would like to emphasise that the European Commission’s Strategic Framework for a Competitive and Sustainable EU Bioeconomy of 2025 recognised the Ecodesign for Sustainable Products Regulation (ESPR) as the relevant tool to support demand and investment in sustainable textiles, including bio-based textiles. To increase the circularity of bio-based materials, the Strategy relies on the ESPR to improve longevity and recyclability, and on the Circular Economy Act to improve waste collection and sorting.

“Made-in-Europe” requirements are already being considered under a series of initiatives, including the upcoming Circular Economy Act, for which the textile industry provided its written contribution to the consultation in November 2025. Any potential “made-in-Europe” requirements should be approached with caution, particularly in the case of globally integrated sectors relying on international sourcing and harmonised distribution systems, where destination-specific origin requirements could reduce economies of scale, increase operational complexity and disproportionately affect European downstream operators competing internationally.

Legislative tools to regulate the textile sector and its environmental impact are being or have already been adopted. The textile industry is fully engaged in the related consultation processes. To avoid duplication, ensure policy coherence, and provide regulatory predictability, we strongly urge the European Commission to avoid including textiles in the Biotech Act II, and to introduce any relevant measures under the legislative frameworks of the ESPR and Circular Economy Act.

Against this background, EBCA would also like to elaborate on a series of concerns regarding the potential inclusion of textiles as a “lead market” under the Biotech Act II and the possible introduction of additional market-pull measures affecting downstream sectors.

1. Need to ensure regulatory coherence

The ESPR framework already provides the legal basis and governance structure to assess the potential introduction of requirements related to recycled content, sustainable raw materials and environmental footprint, among others. In the case of textile apparel, the technical

assessment work led by the JRC is already at an advanced stage and, to our knowledge, does not currently contemplate the types of market-pull measures described in the present Inception Impact Assessment. Any requirement on Sustainably-Sourced Renewable Materials (SSRM) to strengthen the link between bio-based feedstock and sustainability outcomes would depend on the development of an agreed definition. Members of ECBA continue to support the work of Textile Exchange in developing a workable framework.

In this context, it is unclear why a parallel evaluation process addressing similar product parameters would be necessary outside the ESPR framework.

At a time when simplification, competitiveness and regulatory predictability are identified as key EU priorities, introducing additional horizontal obligations through separate parallel initiatives risks creating unnecessary complexity, duplication, and legal uncertainty, including the risk of conflicting criteria.

While EBCA recognises the value of bio-based materials as one of many solutions to improve the sector's sustainability, bioeconomy measures should not be designed in a way that unintentionally distracts from, or slows down, the ongoing circularity transition. For the textile apparel sector, circularity and waste management are already at the core of the transition pathway established under EU legislation. The Biotech Act should be carefully assessed to ensure that it supports the circularity transition already underway in our sector, rather than create uncertainty or misaligned incentives. Trade-offs in the allocation of investment, feedstocks, or infrastructure between bio-based content and other sustainability options are already being assessed for textile products under the ESPR.

2. Lack of technical and methodological foundations

The Inception Impact Assessment refers to mandatory minimum content requirements for bio-based, recycled, or captured carbon products. However, major technical, methodological, and regulatory questions remain unresolved. One of the key challenges currently facing the retail apparel ecosystem is the lack of harmonised EU-wide methodologies and standards relating to measurement systems, chain-of-custody and traceability frameworks, environmental impact assessment and verification methodologies.

Introducing mandatory requirements before these technical and methodological foundations are sufficiently mature risks creating legal uncertainty, fragmentation, market distortion, disproportionate compliance costs, and potential greenwashing.

3. Concerns regarding potential “made-in-Europe” requirements

Competitiveness and industrial innovation in the textile ecosystem should primarily be supported through investment, infrastructure, innovation, and enabling conditions rather than through potentially restrictive origin-based product requirements.

Determining what would constitute “made-in-Europe” for apparel and textile products would raise substantial implementation challenges, particularly in a sector relying on highly integrated and international supply chains involving multiple production stages, suppliers and jurisdictions.

Such measures could create fragmentation risks for operators managing global product portfolios and harmonised distribution systems, requiring differentiated production, sourcing, certification and labelling approaches depending on destination markets. As already highlighted in the ongoing ESPR discussions, destination-specific requirements can generate disproportionate operational costs, reduce economies of scale, and undermine supply chain efficiency.

Considering these implementation challenges and the fact that bio-based fibres are largely sourced outside the EU, EBCA questions the effectiveness of sustainability measures focusing exclusively on domestic production.

4. Need for consultation with affected sectors and careful assessment of downstream market-pull measures

From the perspective of apparel retailers, the Biotech Act II introduces substantial regulatory uncertainty. The explicit inclusion of apparel and textile retail as a potential “lead market” represents a significant expansion of the scope initially associated with the biotech agenda, which until now had largely focused on health and industrial biotechnology upstream sectors. Moreover, the textile sector has not been involved in the discussions shaping these potential demand-side measures, despite the significant implications that the proposed measures could entail.

We understand that many of the concepts currently being explored appear to have primarily emerged from discussions linked to upstream industrial and chemicals decarbonisation challenges in the Critical Chemicals Alliance. This has come as a surprise given that the European Chemicals Industry Action Plan did not expressly identify the textile sector as one of the lead markets for the deployment of such measures. Against this background, it is concerning that discussions on these mechanisms have been taking place without the involvement of the retail apparel sector, while the potential extension of these measures to our products now appears to be under consideration.

While we believe these objectives to be legitimate, apparel retailers should not be expected to absorb major new regulatory obligations before, first, being consulted and, second, key questions relating to feasibility, scalability, traceability, feedstock availability, and consistency with existing legislation have been properly assessed.