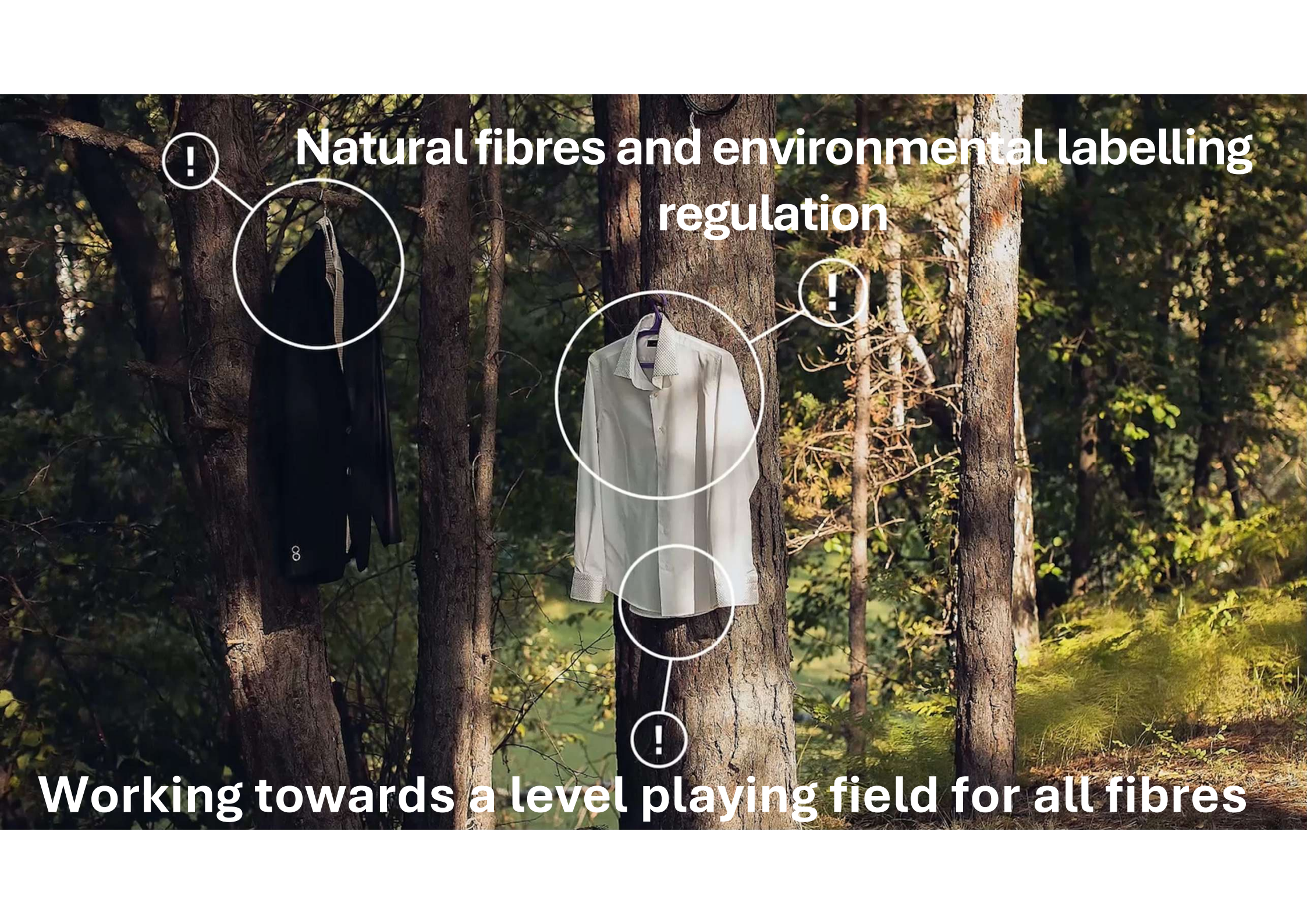


Natural fibres and environmental labelling regulation



Working towards a level playing field for all fibres



Damien Pommeret
Regional Manager Western Europe



Coalition member
Since 2021



Over- production driving legislative action

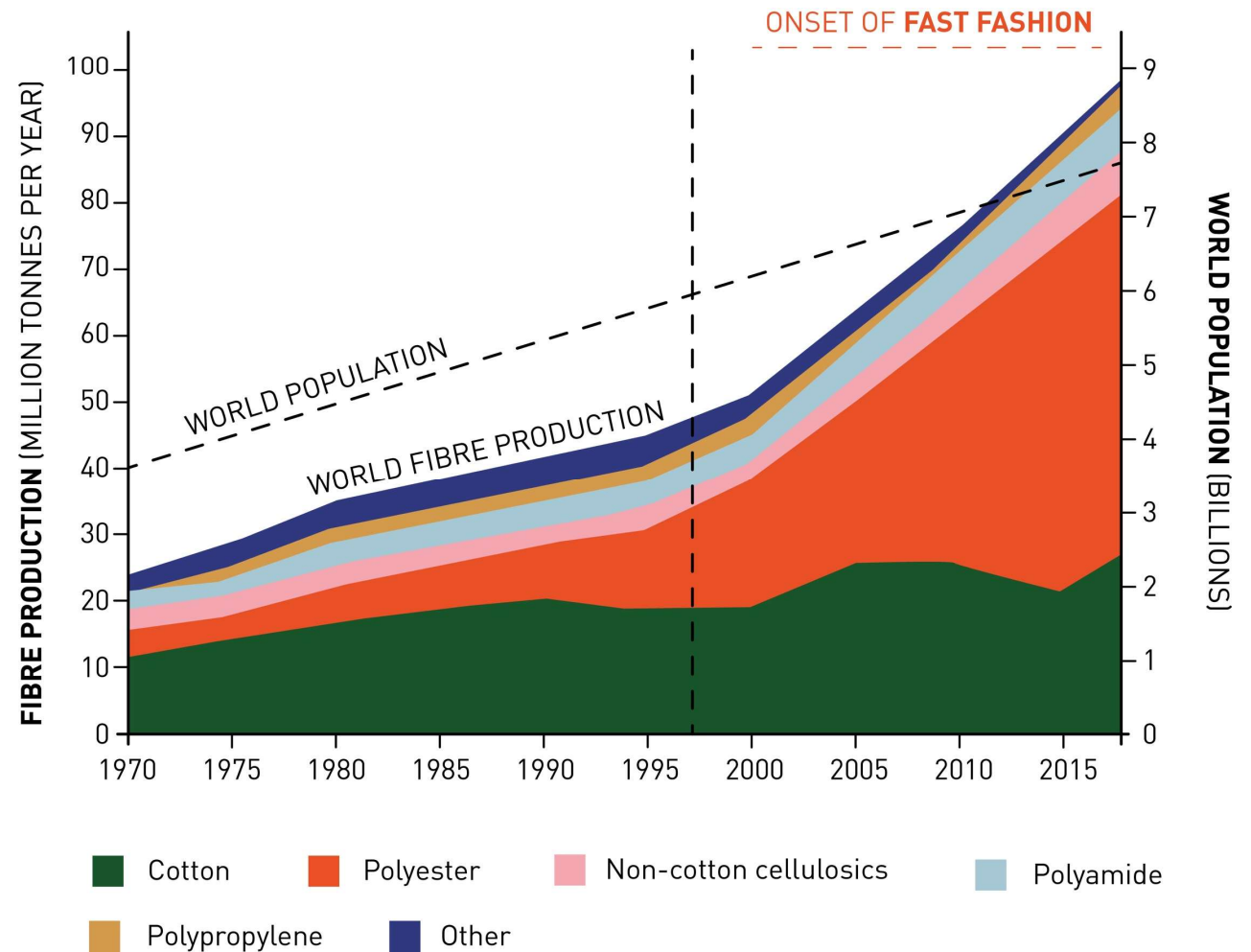


Image source: Getty

European Green Deal

Circular Economy Action Plan

EU Strategy For Sustainable & Circular Textiles

Bioeconomy
Strategy

Deforestation
Regulation

Carbon Border
Adjustment
Mechanism

Eco-Design for
Sustainable Products
Regulation

Corporate
Sustainability
Reporting
Directive

Corporate
Sustainability Due
Diligence Directive

Green Claims
Directive

Textile Labelling
Regulation

Empowering
Consumers for
the Green
Transition

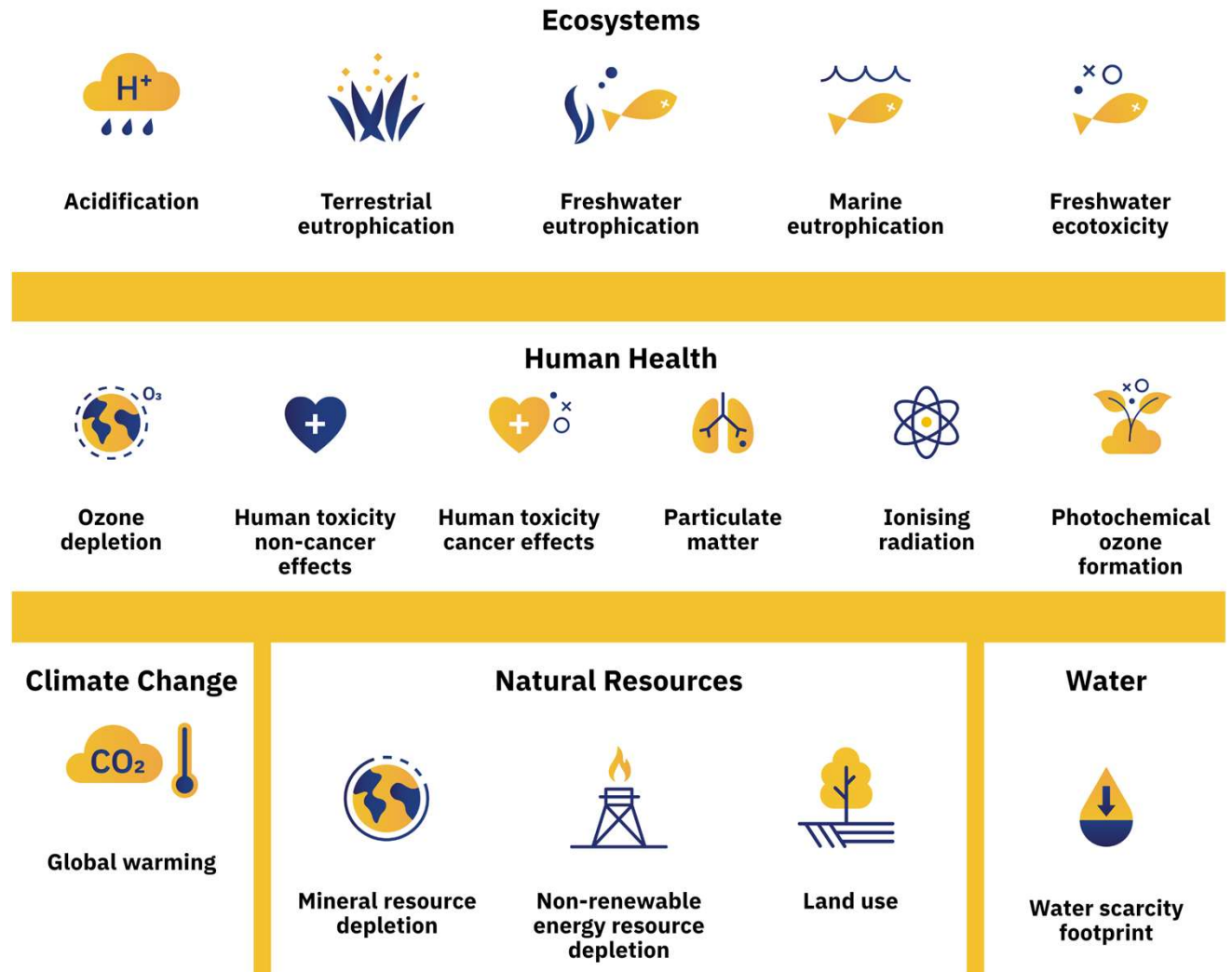
Environmental
Omnibus

Circular
Economy Act

Waste
Framework
Directive



Explaining Product Environmental Footprint (PEF)

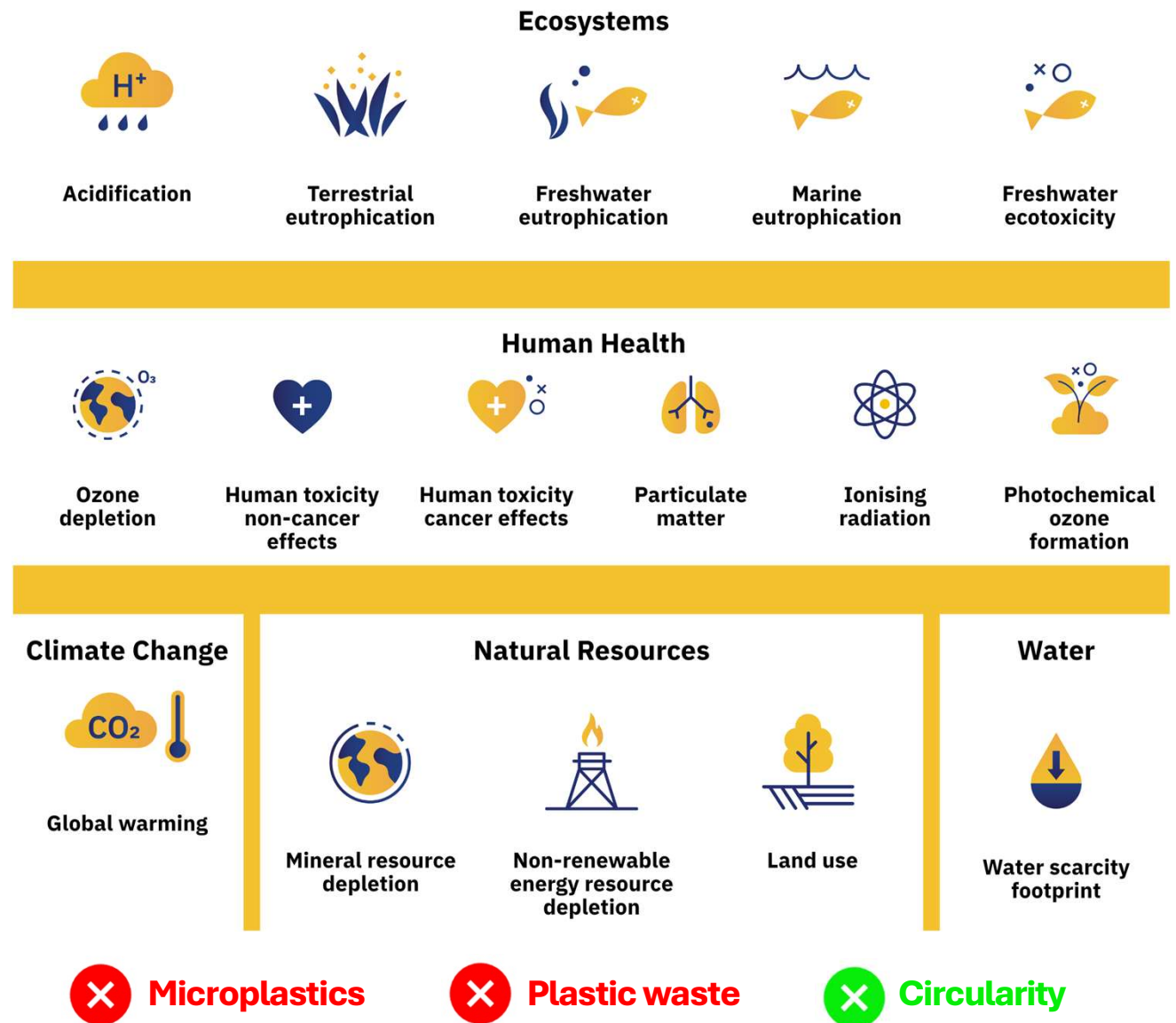


Graphic source: PEFApparelFootwear website



PEF overlooks key impacts of synthetics

Graphic source: PEFApparelFootwear website





PEF's bias against natural fibres

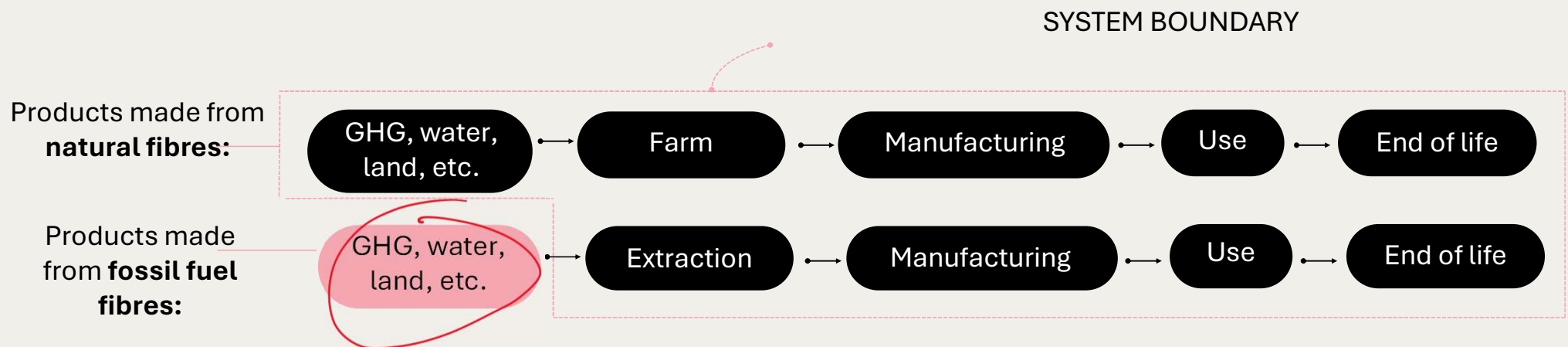


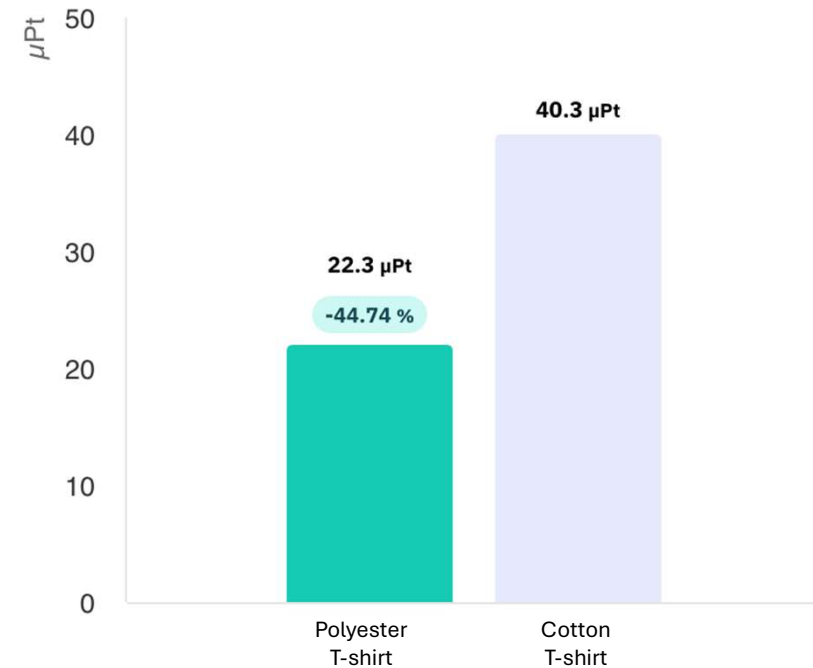


Image sources: Cotton RDC, Getty



PEF in practice

PEF Score in milli-points
calculated on Glimpact



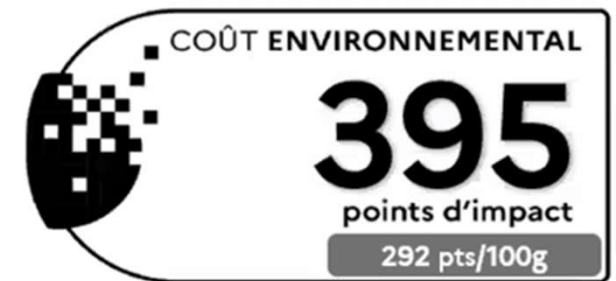
Running an environmental assessment with PEF shows that the environmental impact of a polyester T-shirt is 44% lower than a cotton T-shirt, primarily due to the use of raw materials.



Ecobalyse and the French environmental labelling

WHAT IS ECOBALYSE?

- A scoring tool which calculates the environmental costs of textile products
- Highlights microfibres
- Considers non-physical durability
- Open to updated datasets: The wool industry submitted up-to-date data and achieved a -30% lower impact for wool





Ecobalyse and the French environmental labelling

AGENDA

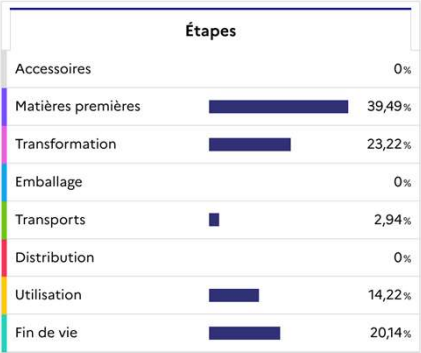
- Validated by European Commission, May 2025
- French publication decree, 9th Sept 2025
- Supervised voluntary display starting 1st October 2025
- Continuation of methodological improvements



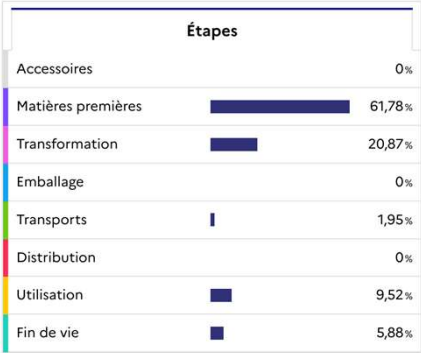


Ecobalyse single score results by fibre

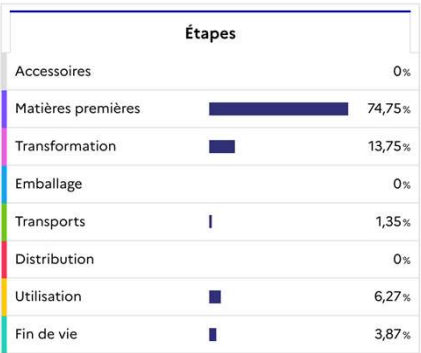
Polyester



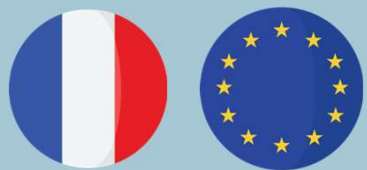
Cotton



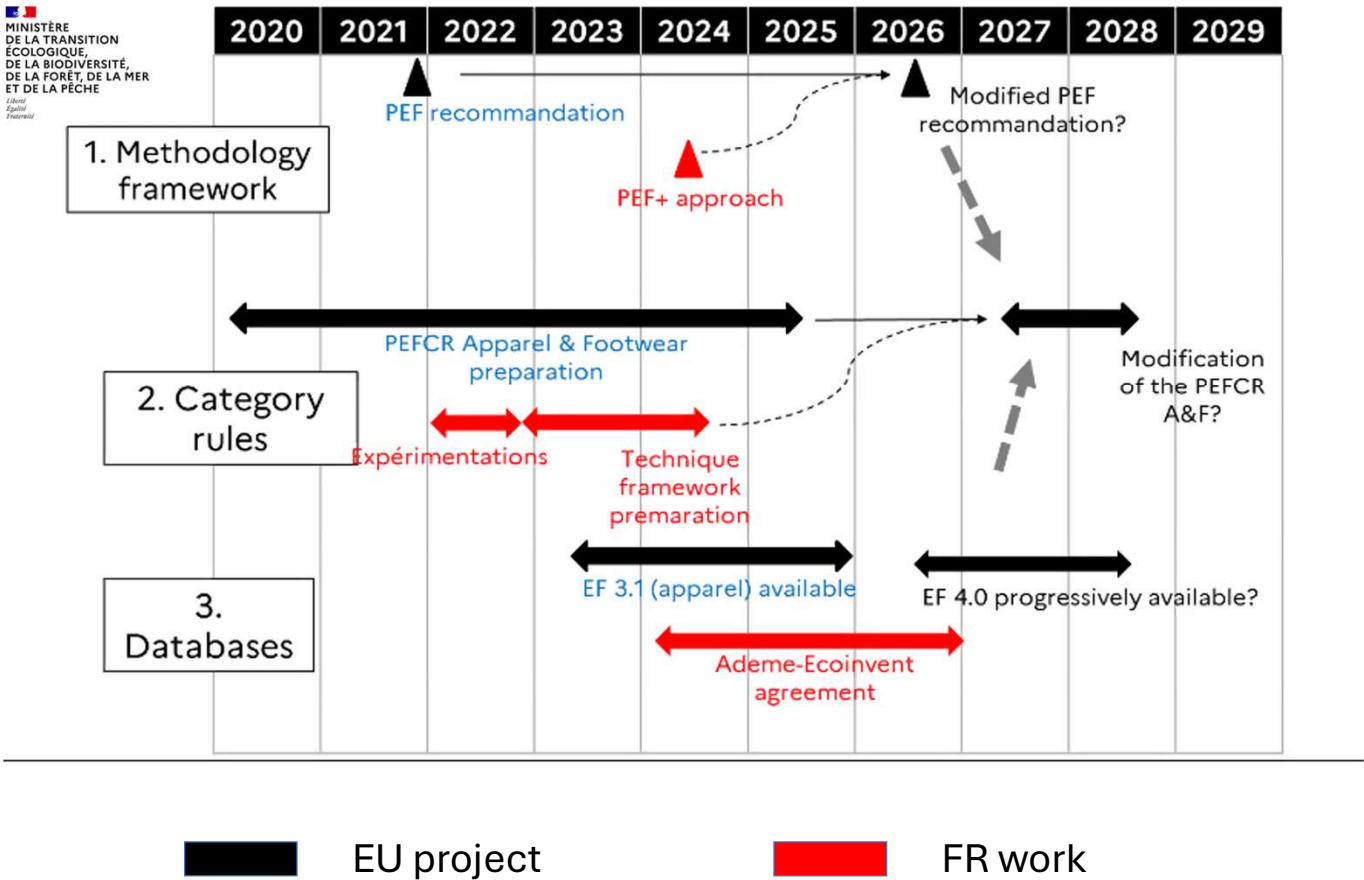
Wool



A lower number assumes a lower environmental impact
According to Ecobalyse a Polyester sweater has a 55% lower in environmental impact than a wool sweater, and 33% lower environmental impact than a cotton sweater.

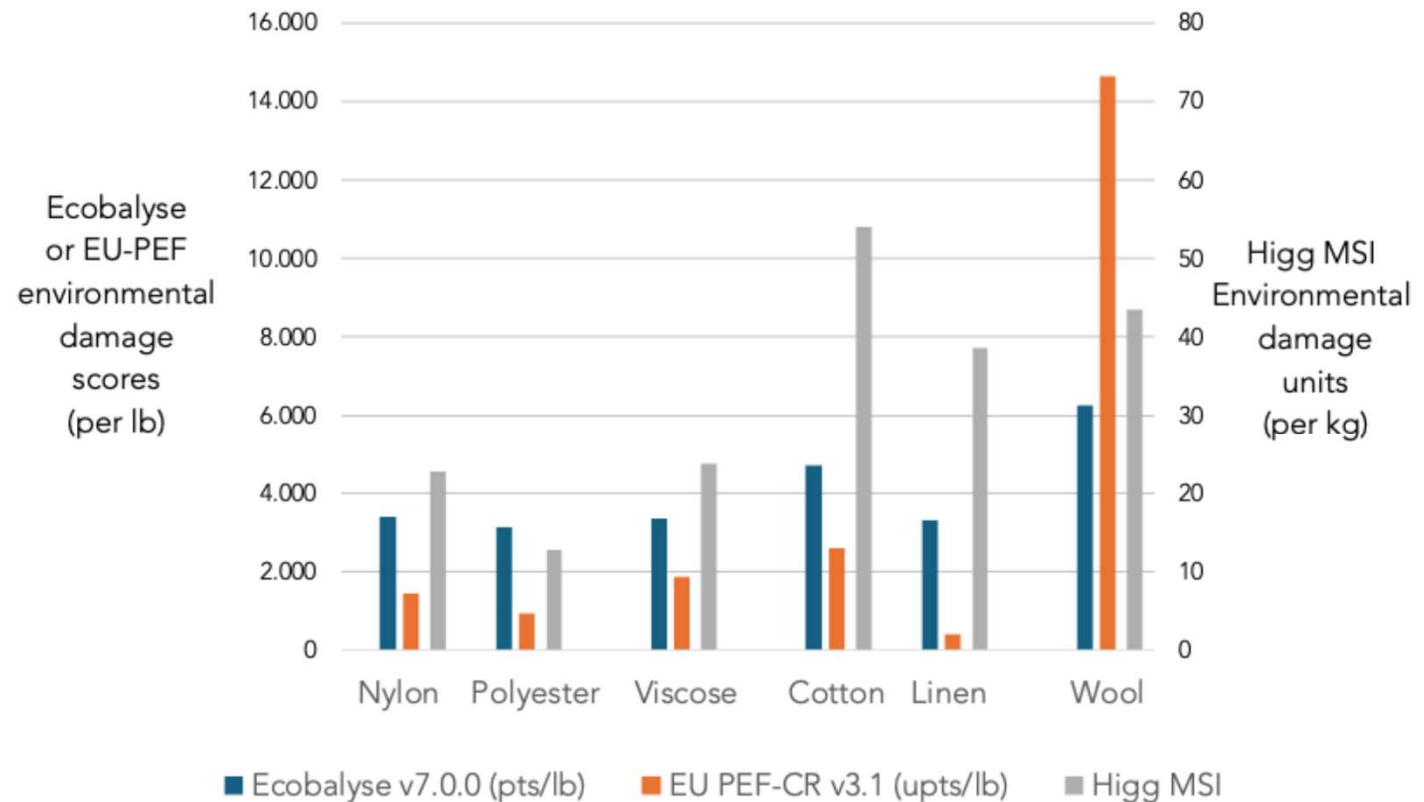


Ecobalyse may influence PEF



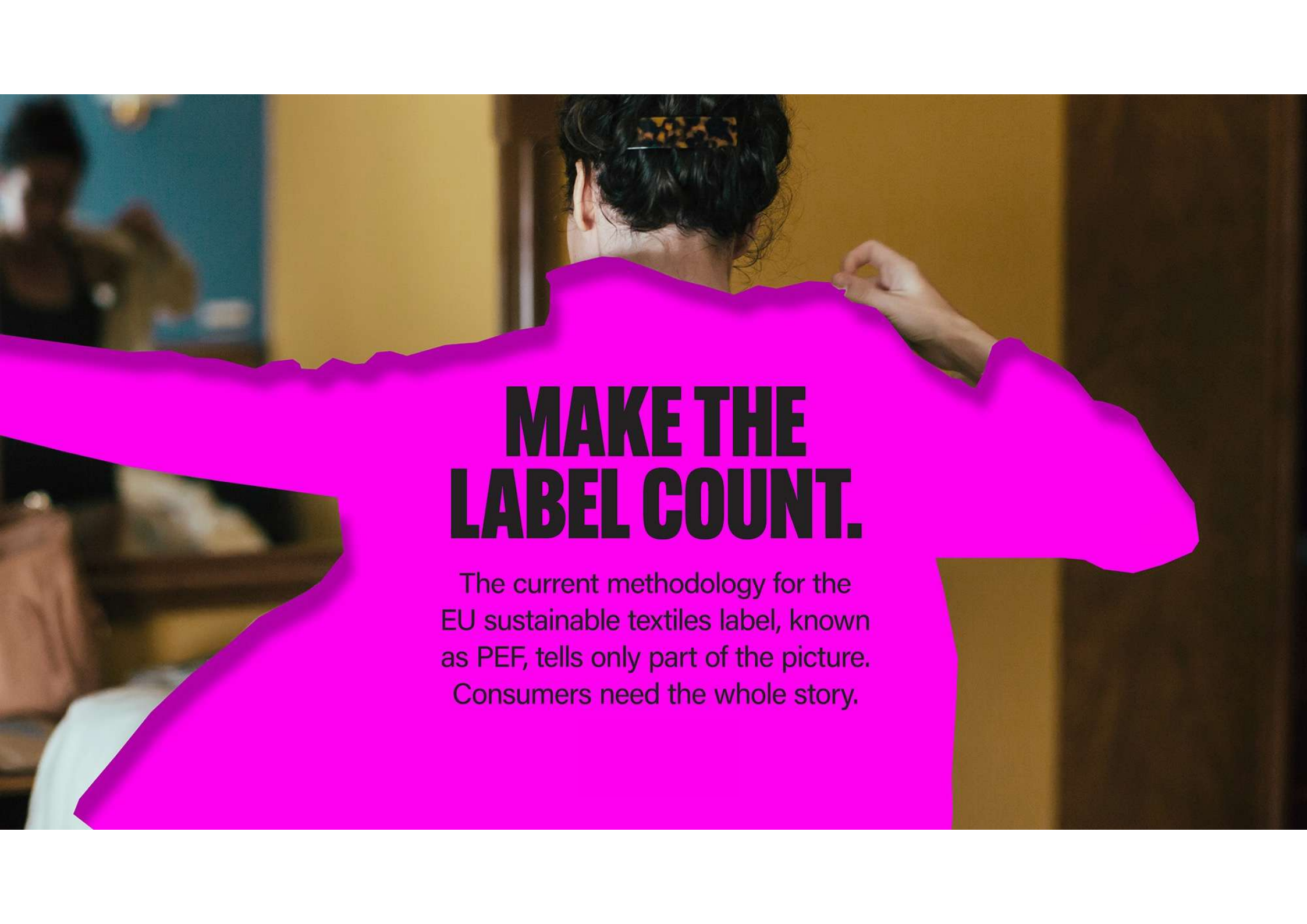
Different methodologies based on assumptions = Confusing results

How do Ecobalyse and PEF-CR rate common fibres?



Sources:

1. Ecobalyse data for 150 gm t-shirt processed in China sourced from Ecobalyse beta (<https://ecobalyse.beta.gouv.fr/#/textile/simulator>). Fiber impacts expressed in points per lb.
2. EU PEF-CR data for 150 gm t-shirt processed in China sourced from Glimpact (<https://tool.glimpact.com/join?config=558265f4-e751-4da1-a9de-912fcfb2099a>). Fiber impacts expressed in micropoints per lb.
3. Higg MSI data sourced from Kymo using data supplied by LENZING (<https://www.kymo.de/en/blog/how-sustainable-are-textiles-a-comparison-using-the-higg-material-index>)

A person with dark hair tied in a bun with a leopard-print clip is seen from behind, wearing a bright pink t-shirt. The t-shirt has a large white text overlay. The background is a blurred indoor setting with warm lighting.

MAKE THE LABEL COUNT.

The current methodology for the EU sustainable textiles label, known as PEF, tells only part of the picture. Consumers need the whole story.

MAKE THE LABEL COUNT



73 coalition members

working to ensure sustainability claims on textiles in the EU are fair and credible







MTLC key figures

- MTLC meetings and engagements since the commencement of the campaign in **October 2021**:
 - **82 meetings** with EU institutional stakeholders, including:
 - 46 with MEPs/staff
 - 14 with European Commission
 - 18 with EU Permanent Representations
 - 4 civil society associations
 - Email outreach to **515 EU institutional stakeholders**
 - **3 events** organised with institutional stakeholders
- **73** coalition members
- **80+** speaking engagements





Positive campaign developments

Public acknowledgement of
the value of natural fibres as
biodegradable
and microplastic-free
alternatives to fossil-based
synthetics.

Delay and possible withdrawal
of Green Claims Directive

Review and update of PEF
methodology in 2025/2026

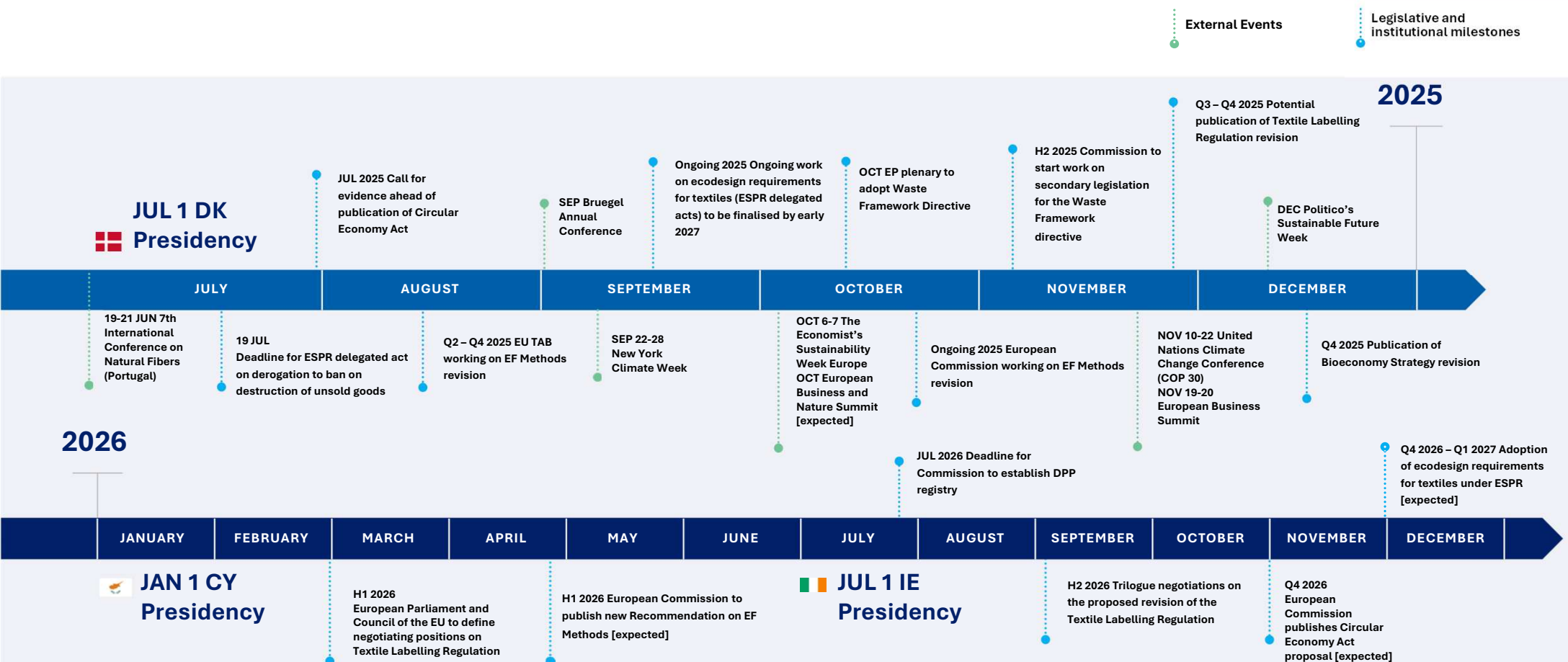
Limitation of the published PEF
for apparel and textiles to be
used in practice



Make the Label Count has already...

- Shifted the conversation around sustainability metrics
- Raised awareness of the limitations of the current PEF methodology in particular for wool and other natural fibres
- Built credibility as a science-based, constructive stakeholder advocating for fair comparisons between fibres
- But we must build on this momentum to ensure that the potential and necessary improvements actually happen and benefit the environmental scoring of wool.

LOOKING AHEAD TO THE NEXT 18 MONTHS



*Negotiations on the Green Claims Directive are currently stalled with no clear timeline for a final decision over its potential withdrawal.



Roadmap for the next 12 months

1. Continue EU advocacy on primary legislation

2. Provide input on secondary legislation

3. Provide input on French national developments*

*Subject to funding

1 CONTINUE EU ADVOCACY ON PRIMARY LEGISLATION



Review of the
Bioeconomy Strategy
(NEW)

Environmental Omnibus (NEW)

Review of the Textile
Labelling Regulation

Review of the Circular
Economy Act (NEW)



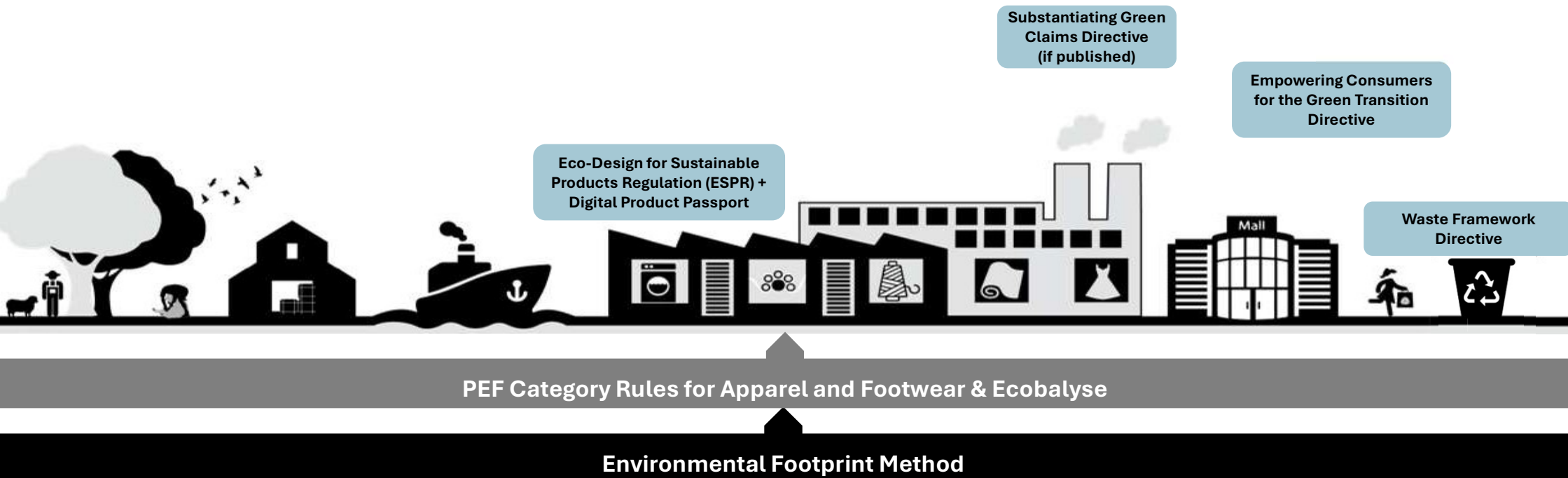
Monitoring & input

Analysis & positioning

Engagement & Advocacy

Make the Label Count engagement on EU primary legislation

2 PROVIDE INPUT ON SECONDARY LEGISLATION



- MTLC will engage with government officials and subject matter experts working on the development of secondary legislation both in Brussels and, more importantly, in the 27 Member States.
- Furthermore, we will provide input to the review of the Environmental Footprint Method

3 PROVIDE INPUT ON FRENCH NATIONAL DEVELOPMENTS



Engage with ADEME and provide input on Ecobalyse

- Contract a French technical LCA expert
- Engage in ADEME's technical process to further develop Ecobalyse by submitting research
- Monitor further legislative developments in France





Make the Label Count has a two-level approach

TECHNICAL ENGAGEMENT

- Bring technical experts to EU advisory boards and technical steering committees
- Deliver technical papers on Life Cycle Assessment, consumer and textile research
- Submit peer-reviewed papers to Journals
- Lead technical Working Groups
- Make methodology proposals

LEGISLATIVE ENGAGEMENT

- Meet with Members of the European Parliament, Council and Commission
- Propose legislative amendments
- Publish White Papers and Open letters
- Run petitions
- Host events
- Participate in public consultations
- Build a network with allied organisations



Action list for Campaign Members

1. Continue EU advocacy on primary legislation

- Participate in **public consultations** on primary legislation (Circular Economy Act, Bioeconomy Strategy, Textile Labelling) – Q4/2025 – Q2/2026
- Submit **feedback to the review of the EF Method** (Q1-Q2/2026)
- MTLC will provide guidance

2. Provide input on secondary legislation

- Forming a **French MTLC working group** for engagement and communication with French EU MEPs, Council Attachés and experts working on secondary legislation such as Ecodesign for Sustainable Products Regulation (ESPR) and Waste Framework Directive
- **MTLC will provide guidance and coordination**

3. Provide input on French national developments

- **Support MTLC efforts to help improve Ecobalyse**



Your involvement counts !

- We are at the brink of a lot of opportunity and positive change but only if we continue advocating for fair and credible methodologies and legislation
- The EU legislative agenda is moving fast and the French one even faster, so we must stay agile and involved.



MAKE THE LABEL COUNT

THANK YOU

Follow us



www.makethelabelcount.org