



EUROPEAN COMMISSION

Brussels 8.5.2025  
C(2025) 3048 final

His Excellency  
Jean-Noël Barrot  
Minister for Europe and Foreign Affairs  
37, Quai d'Orsay  
F-75351 Paris  
France

**Subject: Notifications 2025/86/FR and 2025/87/FR**

**Decree on the methods for calculating and communicating the environmental cost of textile products; Order on signage and methodology for calculating the environmental cost of textile clothing products**

**Delivery of comments pursuant to Article 5(2) of Directive (EU) 2015/1535 of 9 September 2015**

Sir,

Within the framework of the notification procedure laid down by Directive (EU) 2015/1535 <sup>(1)</sup>, the French authorities notified to the Commission on 13 February 2025 the draft '*Decree on the methods for calculating and communicating the environmental cost of textile products*' (notification 2025/86/FR) and the draft '*Order on signage and methodology for calculating the environmental cost of textile clothing products*' (notification 2025/87/FR) (hereinafter, 'the notified drafts').

According to the notification message, the notified drafts introduce a voluntary labelling scheme for textile products. The format proposed will highlight the environmental cost of each piece of clothing. With this method, there are no products that are inherently 'good' or 'bad'; each product has an environmental cost that must be known to the consumer at the time of purchase. France is thus positioning environmental labelling as an essential tool to guide consumers towards more sustainable products.

Examination of the notified drafts has prompted the Commission to deliver the following comments pursuant to Article 5 (2) of Directive (EU) 2015/1535.

---

<sup>1</sup>) Directive (EU) 2015/1535 of the European Parliament and of the Council of 9 September 2015 laying down a procedure for the provision of information in the field of technical regulations and of rules on Information Society services, OJ L 241, 17.9.2015, p. 1.

## COMMENTS

The Commission would like to remind the French authorities that, currently there are no EU rules providing for labelling schemes related to environmental cost of textile clothing products, including under Regulation (EU) No 1007/2011 of the European Parliament and of the Council of 27 September 2011 on textile fibre names and related labelling and marking of the fibre composition of textile products.

In this context, to avoid any potential market barrier for products that are not part of the notified scheme, the proposed scheme should remain completely voluntary. Provisions that would render the scheme mandatory should thus be deleted. Any administrative practice, or any other practice from national authorities, that would have the effect of creating an obstacle to the placing on the market in France of products that are not part of such scheme should be avoided, including in the context of public procurement or green financing.

Furthermore, the proposed scheme should not include the notified criteria of “provision of traceability information” meant to underpin the calculations of “extrinsic durability”, considering its distant and unclear relation to “extrinsic durability”. Moreover, to ensure that the scheme accurately portrays the environmental cost of textile clothing products, the proposed scheme could take due account of the overall size of corporate operations in the garment sector when calculating the environmental cost regarding “extrinsic durability” based on the “number of different products made available on the market”.

The Commission invites the French authorities to take the above comments into account.

The Commission furthermore recalls that once the definitive text has been adopted, it must be communicated to the Commission in accordance with Article 5(3) of Directive (EU) 2015/1535.



For the Commission

Kerstin Jorna  
Director-General

Directorate-General for Internal  
Market, Industry, Entrepreneurship  
and SMEs