Message 301

Communication from the Commission - TRIS/(2025) 0624

Directive (EU) 2015/1535

Notification: 2025/0087/FR

Request for supplementary information from the Commission.

Request for supplementary information - Demande d'informations complémentaires - Žádost o doplňující informace - Ersuchen um ergänzende Informationen - Искане за допълнителна информация - Žádost o dodatečné informace - Anmodning om supplerende oplysninger - Αίτηση συμπληρωματικών πληροφοριών - Solicitud de información complementaria - Lisateabe edastamise palve – Lisätietopyyntö - Zahtjev za dodatne informacije - Kiegészítő információ kérése - Domanda di informazioni complementari - Prašymas pateikti papildomos informacijos - Papildu informācijas pieprasījums - Talba għal tagħrif addizzjonali - Verzoek om aanvullende inlichtingen - Prośba o uzupełnienie informacji - Pedido de informações complementares - Solicitare de informații suplimentare - Žiadosť o ďalšie informácie - Zahteva za dodatne informacije - Begäran om kompletterande upplysningar - Iarraidh ar fhaisnéis fhorlíontach

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1. MSG 301 IND 2025 0087 FR EN 14-05-2025 05-03-2025 COM INFOSUP COM 14-05-2025

2. Commission

3. DG GROW/E/3 - N105 04/63

4. 2025/0087/FR - X30M - Textiles and furnishings

5.

6. Within the framework of the notification procedure laid down by Directive (EU) 2015/1535 , the French authorities notified to the Commission (notification 2025/87/FR) on 13 February 2025 the draft “Order on signage and methodology for calculating the environmental cost of textile clothing products” (hereinafter, ‘the notified draft’).
In order to allow the Commission services to complete their analysis under the relevant provisions of EU law, the French authorities are kindly invited to reply to the following request for supplementary information which concerns the scope of the notified draft.

1. Article 1 paragraph 4 refers to types of garments outside of scope where over 20% of materials are not covered by the methodology- what are the examples of such products?
2. Article 2 refers to a “methodological notice published on the website of the ministries responsible for the environment and the economy”. Could we please have access to this methodology? Is it the methodology available at: Cycle de vie des produits textiles | Ecobalyse? The following questions are based on this methodology.
3. Article 4 The number of theoretical days of use are estimated depending on the product type and in line with the PEFCR for Apparel and Footwear (version 1.3). Why the product categories are different from those included in the PEFCR A&F and how the attribution of the days of use was done? The garments that are not mentioned in the list (i.e. tights, leggings, scarfs, globes, sweaters or cardigans) are they excluded from the scope of this scheme?
4. Article 5 Why does the weighting differ from the PEF method? Why the freshwater toxicity becomes so relevant?
5. Article 5 How the materiality of the two additional impact categories have been decided? 5000 points of impact per 1 kg of garment not reused after having been exported from the EU and 1000 points of impact per 1 kg of reference material for microfibers.
6. Article 5. How have the factors of persistence and release been decided for the 5 categories of fibers? How are all the

fibres grouped into only 5 categories?
7. Article 5. How are the microfibre emission categories defined, and how are economic operators expected to calculate the performance of products on this impact category?
8. Article 5. How are economic operates expected to calculate the performance of products on the 'export outside the EU' impact category?
9. Article 6. It is not clear how the durability is calculated. Is it only based on the three parameters included in this article? How does this durability relate with the days of use? What happens if the same product is sold by two different companies getting two different scores? Would it not be confusing to the consumers?.
10. Article 6. Why does the durability coefficient not include parameters related to the functional durability of products, such as resistance to pilling or dimensional stability after washing?
11. Article 6. Why other aspects that can reflect the extrinsic durability have not been considered (e.g. product price, enduring style, unique design features, discounting rates, reuse or resale)?
12. Article 6. How was the range width parameter estimated? how the benchmarks of 1000, 7000 and 16000 references were selected? Which is the relationship between the range width with the durability of the garment?
13. Article 6. It is not clear how the criterion 2 on the width of the range can influence the durability of the product. Is the criterion implying that the more the number of references the less durable the product is? On which basis is this correlation set?
14. Article 6. How were the average prices of the repair per garment estimated? How is the articulation of both parts of the reparability index for SMEs, if the part ½ has already a weighting of 100%?
15. Article 6. It is not clear how the criterion 3 on the visibility of the geographical traceability of the production steps can influence the durability of a product. Which is the correlation between the visibility of the geographical traceability and the durability of a product? On which basis is this correlation set? .
16. Article 7. Why was the economical allocation selected instead of the biophysical allocation?
17. Article 7. Enriched inventory: it is very complex, which are the data that support this methodology?
18. Article 7. Why the distribution by air transport depends on the durability of the product? Which is the evidence to attribute as a default value100% air transport to the products that have a durability lower than 1 and are coming from non-European or non-African countries?
19. General question. Why a most updated version of the PEFCR was not used?
20. General question. Did the default values reflect the average situation/ average values or worse than average values? If so, how and why these worse than average default values were selected?
21. General question. Are there plans to make this voluntary scheme (at least partially) required through future regulatory action or administrative practice, including in the context of public procurement?

The French authorities are kindly invited to reply by 19 March 2025.

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