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Grant Agreement No. 101294372

WP2 - Policy Alignment, Compliance and Interoperability Framework

Deliverable D2.1 Initial regulatory analysis report

INITIAL REGULATORY ANALYSIS REPORT

Digital Product Passport for TEXtile circularity and traceability

LIFE Programme

LIFE DPP-TEX

DIGITAL PRODUCT PASSPORT
FOR TEXTILE CIRCULARITY AND TRACEABILITY

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Executive summary

The **LIFE DPP-TEX** project addresses the growing environmental burden associated with textile waste generation, inefficient recycling practices, and the lack of traceability in the textile value chain. By demonstrating the use of a **digital product passport (DPP)** across two complementary pilot cases in Bulgaria and Spain, the project aims to develop a scalable and policy-aligned solution that fosters circularity, transparency, and sustainability within the textile sector.

The project proposes **a comprehensive model for textile waste management based on the principles of the circular economy.** Through the deployment of a blockchain-enabled DPP-TEX solution, LIFE DPP-TEX will facilitate end-to-end material traceability, sustainability monitoring, and circularity validation for both post-industrial and post-consumer textile flows. The DPP will provide stakeholders with real-time, product-level environmental data (including carbon footprint, recycled content, and end-of-life pathways), supporting informed decisions along the value chain and compliance with upcoming EU requirements.

The main objective of LIFE DPP-TEX is to demonstrate and validate a DPP solution tailored for textiles, through **two industrial pilots in Spain and Bulgaria.** The system will enable full traceability, support circular business models, and deliver measurable environmental, socio economic, and policy impacts, thereby accelerating the transition of the European textile sector towards a sustainable, transparent, and circular economy.

This report sets out the **initial regulatory analysis** prepared under Task 2.1 of the LIFE DPP-TEX project, led by Terraqui within Work Package 2 (WP2), mapping the legal framework that will govern the digital product passport as it applies to textile and apparel products under the Ecodesign for Sustainable Products Regulation (ESPR), Regulation (EU) 2024/1781. As a living document, it reflects **the state of the regulatory landscape as of the date of this report** – 26 October 2026 – and is intended to be reviewed and updated as the project, and the underlying legislation, progresses.

The **Ecodesign for Sustainable Products Regulation (ESPR)** establishes the DPP as a horizontal, cross-sectoral obligation, but its substantive content, timing and scope for any given product category are determined not by the framework Regulation itself, but by product-specific delegated acts adopted under its Article 4. For textiles specifically, that delegated act remains in preparation: the underlying preparatory study, led by the Commission's Joint Research Centre (JRC), has published its draft findings, including a study on DPP content for textile apparel (May 2026), which remain subject to stakeholder validation and an impact assessment. Formal adoption by the Commission indicatively expected in 2027 and application in 2028–2029 (no earlier than 18 months after its entry into force (Art. 4.4 ESPR)). Until that act is adopted and its requirements apply, no binding DPP obligation exists for apparel products, and the entirety of this report's textile-specific analysis should be read as anticipatory rather than as a description of a presently enforceable regime.

To provide a complete picture notwithstanding that gap, this report addresses the **regulatory landscape** across three complementary dimensions. First, it examines the body of legislation already in force that bears materially on the DPP's eventual content and operation, including the chemical-safety framework of REACH and CLP, the newly harmonised extended producer responsibility (EPR) regime for textiles under the amended Waste Framework Directive, the Market Surveillance and Compliance of Products Regulation (found to carry a genuine, express textual link to DPP content via Annex III ESPR), the General Product Safety Regulation, the CE-marking architecture under the New Legislative Framework, and a wider set of

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adjacent instruments — the GDPR, the EU Data Act, the Digital Services Act, the European Accessibility Act, the EU Ecolabel Regulation, the Packaging and Packaging Waste Regulation, the Critical Raw Materials Act, the Carbon Border Adjustment Mechanism, the Deforestation Regulation, and the Forced Labour Regulation, among others — each assessed specifically for its practical, rather than merely nominal, relevance to this analysis.

Second, this report addresses forthcoming legislation still in preparation or negotiation. This includes the delegated act on DPP service providers and the horizontal measure on repairability scoring, whose intended scope does not currently include textiles. It also includes the Green Claims Directive proposal, whose negotiations have been suspended since the Commission announced in June 2025 its intention to withdraw it, although the proposal has not been formally withdrawn. By contrast, the related Empowering Consumers for the Green Transition Directive is not forthcoming legislation: it has been adopted and has applied since 27 September 2026, and is analysed with the legislation in force. Finally, the Circular Economy Act, a legislative proposal announced in the 2026 Commission Work Programme for the third quarter of 2026, has reportedly been postponed to November 2026 and had not been tabled at the date of this report.

Third, this deliverable traces the DPP's policy lineage through the European Green Deal architecture, establishing that the DPP concept originates not in the ESPR itself but in the 2020 Circular Economy Action Plan[1], and is subsequently reinforced through the 2022 EU Strategy for Sustainable and Circular Textiles, the Chemicals Strategy for Sustainability, the Zero Pollution Action Plan, and the more recent Competitiveness Compass and Clean Industrial Deal — the latter pair also being the source of the Omnibus (Directive (EU) 2026/470) simplification agenda that has materially narrowed the scope of the CSRD and CSDDD, findings incorporated throughout this report's analysis of those instruments.

The present report further examines the technical standardisation layer underpinning the DPP's operation. The eight **European standards developed by CEN/CLC/JTC 24** under standardisation request M/604 (addressed to CEN, Cenelec and ETSI), six of which were cited in the *Official Journal of the European Union* (OJEU) on 15 July 2026 as harmonised standards, grounding a presumption of conformity with Articles 10 and 11 ESPR, to the extent covered by those standards, with the remaining two (governing access rights and data authentication) pending citation as of the most recent information available.

This report also supports the **practical implementation of LIFE DPP-TEX** by identifying the main regulatory implications for the DPP architecture, pilot activities, Life Cycle Assessment (LCA)/impact work and regulatory watch until M30. It provides the regulatory basis for future technical and operational deliverables.

For the project itself, the analysis yields several findings of direct practical relevance. According to the JRC's preparatory work, which remains subject to validation, the textile delegated act is expected to cover textile apparel only. On that basis, the home textiles and recycled fibres handled in the Bulgarian pilot would fall outside its scope, and their DPP would be voluntary and forward-looking. Workwear in the Spanish pilot would be covered, except where it qualifies as personal protective equipment, and the treatment of upcycled products remains open. Under the amended Waste Framework Directive, operators supplying upcycled or reused textiles are not considered producers for the purposes of extended producer responsibility. To translate these findings into action, Section 3 sets out the legal requirements as DPP design elements, the implications of the JRC proposals for the pilots, the practical consequences for each

[1] A new Circular Economy Action Plan For a cleaner and more competitive Europe. Brussels, 11.3.2020. COM(2020) 98 final. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52020DC0098

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work package, and the regulatory developments to be monitored until M30. These are complemented by operational tools for the consortium: a one-page DPP compliance roadmap for textiles, a DPP timeline for textiles (Annex I), a shared DPP compliance checklist covering all the ESPR requirements and further anticipated elements (Annex II), and an overview of the main EU legislation cited in this report (Annex III).

Finally, beyond the EU-level analysis summarised above, the present report separately examines the **national legislative landscape** in Spain, Bulgaria — the two jurisdictions hosting the LIFE DPP-TEX project's industrial pilots —, and the Netherlands. For each country, the report identifies which of the Directives addressed in this analysis have already been transposed, which remain pending or delayed, and which national instruments — beyond formal transposition measures — bear broader relevance to the DPP's eventual operation, including public procurement, climate, and data protection legislation. The report also identifies forthcoming, jurisdiction-specific developments of direct relevance to the DPP — most notably Spain's draft Real Decreto on textile and footwear waste, and Bulgaria's pending ordinance on the same subject matter — both of which will shape how the EU-level textile EPR and DPP obligations addressed elsewhere in this report are ultimately implemented on the ground in the project's two pilot countries. The Netherlands has operated a textile EPR scheme since 2023, and both the Netherlands and Bulgaria have transposed the Empowering Consumers Directive; Spain's transposition remains pending.

Taken as a whole, this regulatory analysis' central conclusion is that the DPP cannot be assessed, or prepared for, in isolation: its eventual content, legal weight and practical operation depend on a dense and still-shifting network of adjacent Union and national instruments, several of which remain in active flux at the time of writing. The recommendations developed throughout this document are accordingly oriented toward building a compliance and data infrastructure capable of serving this wider regulatory ecosystem, rather than treating DPP readiness as a narrow, standalone obligation tied to a single, as-yet-unadopted delegated act.

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1. Introduction

1.1 Purpose of this document

This document constitutes the **Initial Regulatory Analysis Report (D2.1)** of the **LIFE DPP-TEX project,** presenting a preliminary but comprehensive gap analysis that maps both the existing and the forthcoming legislation with direct relevance to textiles and digital traceability. Its purpose is to establish the legal framework that will underpin the development of the LIFE DPP-TEX solution, translating the applicable EU and national regulatory requirements into a clear point of reference for the rest of the consortium. Rather than a static, one-off deliverable, the report is conceived as a living document: it reflects the state of the regulatory landscape at the time of writing and is intended to be reviewed and updated as the project progresses and as new legislative developments emerge.

The report is produced under Task 2.1 (Regulatory Analysis, M1–M30) to ensure that the LIFE DPP-TEX solution remains aligned with the relevant legal frameworks governing the textile sector throughout the project's lifetime, and that partners have a clear regulatory basis to guide the technical development, pilot activities, impact assessment and future compliance work.

1.2 Project overview and context

The textile sector is among the most environmentally impactful industries in Europe. The European Union generates approximately 6.95 million tonnes of textile waste each year, an average of 16 kg per person, of which only 4.4 kg is separately collected for reuse or recycling[2]. The remaining volume is largely incinerated or landfilled, resulting in significant environmental burdens, including greenhouse gas (GHG) emissions, resource depletion, and pollution.

In terms of climate impact, the textile industry accounts for around 8% of global CO_2 emissions, stemming from the entire lifecycle of textiles, from raw material extraction and production to transportation, use and disposal[3]. Furthermore, textile production exerts immense pressure on water resources, ranking as the third-largest global industrial water consumer, after oil and paper[4]. Producing just 1 kg of fabric consumes approximately 200 litres of water, particularly during dyeing and finishing processes. Additionally, the widespread use of chemicals contributes to soil and water contamination in many textile-producing regions[5].

Compounding these challenges is the lack of traceability within the textile value chain. Reliable product-level data over the whole supply chain from fibre production to manufacturing, data on use and effective reuse, recycling, and final discarding are essential. Without these data, compliance with environmental legislation remains difficult to implement and difficult to prove. This creates a systemic barrier to circularity.

[2] Deckers, J., & Duhoux, T. (2024). *Textile waste management in Europe's circular economy* (ETC CE Report 2024/5). European Topic Centre on Circular Economy and Resource Use / European Environment Agency. https://www.eionet.europa.eu/etcs/etc-ce

[3] Ellen MacArthur Foundation. (2017). *A new textiles economy: Redesigning fashion's future*. Ellen MacArthur Foundation. http://www.ellenmacarthurfoundation.org/publications

[4] Klaseva, A. (2020). *Sustainable textile and fashion industry: Water and environmental challenges* [PDF]. Textile & Fashion 2030. https://textileandfashion2030.se/wp-content/uploads/2020/02/AlinaKlaseva.pdf

[5] Chavan, R. B. (2018). *Thirsty textile and fashion industry. Part I: Water distribution on Earth and virtual water, water footprint concepts*. Trends in Textile & Fashion Design, 2(5), Article LTTFD.MS.ID.000150. DOI: 10.32474/LTTFD.2018.02.000150

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The textile waste problem in Europe is characterised by high volumes and by fragmented and inefficient management pathways. Textile waste arises from both household (post-consumer) and non-household (post-industrial and pre-consumer) sources. However, only a limited share is separately collected; the majority is discarded in mixed municipal waste, leading to landfilling or incineration. Even when textiles are captured, inadequate sorting and pre-treatment capacities mean that large fractions are still exported or downcycled, with limited opportunities for reuse and high-value recycling.

At EU level, around 82% of textile waste originates from households (post-consumer), while the remainder comes from manufacturing and unsold textiles (post-industrial and pre-consumer). Because most textile waste is generated by dispersed private households rather than by a limited number of industrial sources, collecting it separately is particularly difficult. This, combined with insufficient collection and treatment infrastructure, helps explain why only 12% of textiles are currently collected separately in Europe; the vast majority are discarded with mixed municipal waste and subsequently landfilled or incinerated[6].

Such inefficiencies create a critical barrier for circular economy ambitions: without traceable data on textile composition and flows, it is difficult to prioritise reuse over recycling, or to ensure compliance with EU waste legislation and the upcoming DPP requirements.

LIFE DPP-TEX responds to three interlinked challenges in the textile sector: rising volumes of textile waste, recycling processes that remain largely inefficient, and limited traceability along the value chain. Through two complementary pilots, in Bulgaria and Spain, the project tests how a Digital Product Passport can support more circular, transparent and sustainable textile flows, with the aim of delivering a solution that can be scaled up and that is aligned with emerging EU policy.

1.3 The consortium

The LIFE DPP-TEX project holistically integrates actors from across the entire textile value chain. It includes digital and environmental tech expert providers (BLUEROOM, bAwear BV), manufacturers and waste generators (KALINEL EOOD, ALSICO), recyclers and circular solutions provider (EUROTEX Ltd. (TexCycle), EIG/Sekond), a regulatory and policy expert (Terraqui), and sectoral replication enablers (Tèxtils.CAT). This multi-actor setup ensures that the proposed solution is technically robust, policy-aligned, and widely replicable, and that it reflects the real needs of both large producers and SMEs within the circular economy framework.

No.	Short name	Partner	Country	Role in the project
1	BLUEROOM	Blue Room Innovation SL	Spain	Coordinator; DPP technology developer (WP1, WP3); Final Event host; WP7 Impact co-leader
2	KALINEL	Kalinel EOOD	Bulgaria	Home-textile manufacturer (WP4 pilot)
3	EUROTEX (TexCycle)	Eurotex Ltd	Bulgaria	Textile recycler (WP4 pilot lead)
4	ALSICO	Alsico Iberia, S.L.	Spain	Workwear manufacturer (WP5 pilot lead)
5	EcoIntelligent Growth	EcoIntelligent Growth, S.L.	Spain	Circular solution provider (WP5 pilot)

[6] Deckers, J., & Duhoux, T. (2024). *Textile waste management in Europe's circular economy* (ETC CE Report 2024/5). European Topic Centre on Circular Economy and Resource Use / European Environment Agency. https://www.eionet.europa.eu/etcs/etc-ce

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No.	Short name	Partner	Country	Role in the project
6	bAwear BV	bAwear BV	The Netherlands	LCA and circularity metrics leader (WP7)
7	Tèxtils.CAT	Assoc. Agrupació d'Empreses Innovadores Tèxtils	Spain	WP6 leader - communication, dissemination and stakeholder engagement
8	Terraqui	Estudi Jurídic Ambiental, S.L.P.	Spain	Legal/policy compliance leader (WP2, WP7)

Table 1. LIFE DPP-TEX consortium and role.

As WP2 leader, Terraqui coordinates and oversees the proper execution of WP2's tasks, ensuring the DPP solution is fully aligned with the relevant national and EU regulatory framework, technical standards, and data principles. This involves analysing the regulatory landscape in Spain, Bulgaria and the Netherlands mapping the applicable international and European standards for DPP data and traceability, and developing a compliance and interoperability framework that translates these legal obligations into concrete data and system requirements. Terraqui's coordinating role means tracking progress across these tasks while ensuring they remain consistent with one another, together delivering the robust legal and standardisation framework needed to make the DPP solution compliant, interoperable, and ready for regulatory deployment across the EU textile sector.

References to Sekond/EIG in this document reflect the operational transition by which EcoIntelligent Growth (EIG) assumes the original Spanish pilot circularity role assigned to Sekond, subject to the formal Grant Agreement amendment process.

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2. Regulatory analysis

This Section provides a structured overview of laws and regulations in force or anticipated at national (Spain, Bulgaria and the Netherlands) and EU level, relevant to the DPP for textiles, organised across three subsections that together map the regulatory landscape by legal status and policy function. *Existing legislation* examines the instruments already in force that bear directly or indirectly on the DPP's design, content and operation — from the ESPR itself to the adjacent Union and national frameworks addressed throughout this report, such as REACH, CLP, the Waste Framework Directive and the General Product Safety Regulation, inter alia. *Forthcoming legislation* turns to the instruments still under preparation, negotiation or delay — including the textile-specific ESPR delegated act, the DPP service provider rules, and proposals such as the Green Claims Directive and the Circular Economy Act — assessing their current procedural status and their anticipated bearing on the DPP once adopted. Finally, *Alignment with EU Strategies, Plans and Deals* situates the DPP within its broader policy lineage, tracing its conceptual and political origins through the European Green Deal, the Circular Economy Action Plan, the EU Strategy for Sustainable and Circular Textiles, and the Competitiveness Compass, among others, to explain why the DPP has taken the specific form and priority sequencing it has. Taken together, these three subsections are intended to give the reader a single, coherent reference point from which to assess both the binding obligations and the regulatory trajectory it should anticipate over the coming years.

2.1 Existing legislation

The DPP is not a stand-alone piece of law in its own right — it is built on top of a handful of overarching framework regulations that establish the general rules, principles, and obligations governing its use, and it is then given concrete, sector-specific shape through a steadily expanding body of product-specific delegated acts adopted by the Commission. The framework instruments lay the foundation — defining what a DPP is, what purposes it serves, and the baseline requirements that apply across product categories — while the delegated acts fill in the operational detail for each individual sector, specifying the particular data fields, formats, and compliance deadlines that apply to that category of product. As more of these delegated acts are adopted over time, the range of products and industries brought within the scope of the DPP framework continues to grow, so what began as a fairly compact legal architecture is progressively becoming a much larger and more intricate patchwork of sector-specific rules layered on a common regulatory base.

This section provides a high-level overview of the regulatory landscape surrounding the DPP, with its focus set firmly on the European Union policy context. What follows is a concise but indicative insight into significant legislative acts within the European Union with primary focus on cross-sectoral legislation. The pieces of legislation identified below have been found to be closely tied to the implementation of the DPP across sectors.

2.1.1 ESPR: Core Legislative Frameworks and Founding Act

The **Ecodesign for Sustainable Products Regulation (EU) 2024/1781 (ESPR)**[7], published in the EU Official Journal on 28 June 2024, and in force since 18 July 2024, is the primary legal framework. It replaces the Ecodesign Directive 2009/125/EC[8], broadening the scope of the framework beyond energy performance

[7] Regulation (EU) 2024/1781 of the European Parliament and of the Council of 13 June 2024 establishing a framework for the setting of ecodesign requirements for sustainable products, amending Directive (EU) 2020/1828 and Regulation (EU) 2023/1542 and repealing Directive 2009/125/EC. ELI.

[8] Current work continues under the pre-existing ecodesign framework alongside the new one. The ESPR builds on, and is ultimately intended to fully replace, the Ecodesign Directive 2009/125/EC — but the transition is designed to leave no gap: since the ESPR entered into force in July 2024, a transitional regime has kept the Ecodesign Directive operative, including for the purpose of implementing the Ecodesign and

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alone to cover the full environmental lifecycle of products. The ESPR is the underlying legal framework for the DPP. This document aims to provide a careful analysis of its content to establish the ESPR requirements for the DPP. Specifically, the DPP is regulated under **Articles 9 to 15 of the ESPR** (CHAPTER III) but this section aims to analyse the ESPR in a broader sense.

Pursuant to Article 1, the ESPR *establishes a framework for the setting of ecodesign requirements that products have to comply with to be placed on the market or put into service, with the aim of improving the environmental sustainability of products in order to make sustainable products the norm and to reduce the overall carbon footprint and environmental footprint of products over their life cycle, and of ensuring the free movement of sustainable products within the internal market*. The Regulation also establishes a DPP, provides for the setting of mandatory green public procurement requirements and creates a framework to prevent unsold consumer products from being destroyed.

As mentioned, the ESPR introduces the DPP across most physical goods placed on the EU single market. The Regulation applies to nearly all physical goods that are placed on the market or put into service, including components and intermediate products. However, Article 1 further define which products fall outside the scope of this regulation:

> *(a) food as defined in Article 2 of Regulation (EC) No 178/2002;*
> *(b) feed as defined in Article 3(4) of Regulation (EC) No 178/2002;*
> *(c) medicinal products as defined in Article 1(2) of Directive 2001/83/EC;*
> *(d) veterinary medicinal products as defined in Article 4(1) of Regulation (EU) 2019/6;*
> *(e) living plants, animals and micro-organisms;*
> *(f) products of human origin;*
> *(g) products of plants and animals relating directly to their future reproduction;*
> *(h) vehicles as referred to in Article 2(1) of Regulation (EU) No 167/2013, in Article 2(1) of Regulation (EU) No 168/2013 and in Article 2(1) of Regulation (EU) 2018/858, in respect of those product aspects for which requirements are set under sector-specific Union legislative acts applicable to those vehicles.*

The ESPR main text itself does not set out product-specific requirements — that task is delegated to the Commission, which issues sector-specific delegated acts one category at a time. In the case of textiles, the **Commission's ESPR Working Plan 2025-2030**[9] names "Textiles/Apparel"[10] among the priority product groups for the first working plan, with an indicative adoption year of 2027 for the delegated act; its requirements would apply no earlier than 18 months after entry into force (Article 4.4 ESPR). Footwear, by contrast, is treated as its own category and falls outside this first working plan; rather than moving straight to a delegated act, the Commission has commissioned a study — due by the end of 2027 — to determine whether ecodesign requirements for footwear are justified.

CHAPTER II of the Regulation –***ECODESIGN REQUIREMENTS***– sets out crucial provisions regarding: Commission empowerment to adopt delegated acts (Article 4); what requirements can cover and how they must be developed (Article 5); specifications on performance (Articles 6) and information (DPP obligations) requirements (Articles 7); and a drafting checklist of minimum information that the delegated acts adopted pursuant to Article 4 shall specify (Article 8).

Energy Labelling Working Plan 2022-2024, adopted on 30 March 2022. That earlier Working Plan builds on work carried out since the original Ecodesign Directive's adoption, while also covering the obligations arising under the Energy Labelling Framework Regulation (EU) 2017/1369. Article 79 ESPR provides transitional rules: the Commission may adopt implementing measures under the Directive for certain energy-related products until 31 December 2026, and existing implementing measures remain applicable until repealed.

[9] COMMUNICATION FROM THE COMMISSION Ecodesign for Sustainable Products and Energy Labelling Working Plan 2025-2030. COM/2025/187 final. Document 52025DC0187.

[10] JRC (2026a), s. 4.1, p. 21: textile product defined as containing at least 80% textile fibres by weight, as in the ESPR preparatory study. The same study also sets out (s. 4.2) the exclusions: smart and electronic textiles, PPE, medical devices and toys.

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The **DPP legal basis** is in articles 9 through 15 ESPR, with the minimum dataset set out in Annex III. Article 9 establishes the basic legal architecture for the DPP: information requirements; the mandate that data shall be accurate, complete and up to date; data requirements that should be covered by the delegated acts; technical standards and the requirement that passports remain available for a period at least equal to the expected lifetime of a specific product (Article 9.2 (i) ESPR).

Article 10 sets out further **essential requirements for the DPP:** it shall be connected through a data carrier (that physically present on the product, its packaging or on documentation accompanying the product) to a persistent unique product identifier; data based on open standards principle; data storage consent and access rights and level of granularity (model, batch or item as specified in the delegated act adopted pursuant to Article 4). This article also establishes the obligations the economic operator placing the product on the market has, essentially: providing dealers and providers of online marketplaces with a digital copy of the data carrier or the unique product identifier; and making available a back-up copy of the DPP through a digital product passport service provider.

Article 11 establishes **essential requirements for the technical design and operation of the DPP:** interoperability (in relation to the technical, semantic and organisational aspects of end-to-end communication and data transfer); free of charge and easy access to the DPP (based on their respective access rights set out in the applicable delegated act adopted pursuant to Article 4); storage obligations; availability; rights to introduce, modify or update data; reliability, integrity and data authentication; and a high level of security and privacy as well as fraud prevention. In sum: technical requirements for interoperability and security.

Article 12 sets out the rules governing the unique identifiers used within the DPP system — namely, the unique operator identifiers[11] and unique facility identifiers[12] referenced in Annex III. It requires these identifiers to conform to the applicable harmonised standards (or, in the interim, equivalent European or international standards) until such harmonised standards are formally published. Where an operator or facility does not yet have the relevant identifier, the economic operator creating or updating the DPP is responsible for requesting one on that actor's behalf — but only after first confirming with the actor that no such identifier already exists — and must then pass on the identifier's full details once it has been issued. The Article also empowers the Commission to adopt delegated acts to govern the broader life cycle management of these identifiers and their associated data carriers, covering matters such as the criteria and role of organisations wishing to act as issuing agencies, the rules allowing economic operators to create their own identifiers independently of an issuing agency, and the standards needed to ensure identifiers are reliable, globally unique, and properly maintained, updated, or withdrawn over time. Finally, it directs the Commission, in developing these rules, to prioritize interoperability across different approaches, to build on existing technical solutions and standards, and to keep the framework as technologically neutral as possible.

Regulation (EU) 2024/1781 of the European Parliament and of the Council of 13 June 2024 establishing a framework for the setting of ecodesign requirements for sustainable products, amending Directive (EU) 2020/1828 and Regulation (EU) 2023/1542 and repealing Directive 2009/125/EC. ELI.	
Type of Act	Regulation
Status	In force; product-specific requirements, including DPP requirements, are

[11] According to Article 2 ESPR, 'unique operator identifier' means a unique string of characters for the identification of an actor involved in a product's value chain.
[12] According to Article 2 ESPR, 'unique facility identifier' means a unique string of characters for the identification of locations or buildings involved in a product's value chain or used by actors involved in a product's value chain.

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	phased in through delegated acts		
Brief summary	*This Regulation establishes a framework for the setting of ecodesign requirements that products have to comply with to be placed on the market or put into service, with the aim of improving the environmental sustainability of products in order to make sustainable products the norm and to reduce the overall carbon footprint and environmental footprint of products over their life cycle, and of ensuring the free movement of sustainable products within the internal market. This Regulation also establishes a digital product passport, provides for the setting of mandatory green public procurement requirements and creates a framework to prevent unsold consumer products from being destroyed.* (Article 1)		
Impact on LIFE DPP-TEX	High		
National transposition (ES/BG/NL)	N/A — directly applicable		
Key dates	Adoption date	OJEU publication	Entered into force
	13 June 2024	28 June 2024	18 July 2024

Table 2. Legislation Overview.

Following Article 13 and 14, the ESPR establishes a centralised EU "Digital Product Passport Registry" and "Web portal for data in the digital product passport" are already in place. On 16 July 2026, the DPP Registry framework was established via its corresponding Implementing Act[13] adopted by the Commission. On 20 July 2026 the DPP Registry became operational[14]. The **DPP Registry** acts as the indexing service for all DPPs of products placed on the EU market or put into service. As specified in the applicable legal act, the Registry will operate as a secure database holding each product's unique identifiers, registration data, and high-level metadata, rather than the full, detailed product information found within the DPP itself. Depending on the applicable delegated acts or other relevant Union law, the Registry may also be required to store additional information. In essence, the Implementing Regulation sets out the Registry's operational framework, covering access management, user verification, data registration, storage requirements, and the system's technical architecture.

Manufacturers and other responsible economic operators[15] must register a product's DPP in the Registry before that product is placed on the EU market or put into service (once a delegated act requires a DPP for the product concerned), ensure a verifiable link between the Registry entry and the data carrier affixed to the product, and keep the registered data accurate and accessible for the full duration of the required retention period. The Registry supports the functioning of the DPP throughout a product's lifecycle.

[13] Commission Implementing Regulation (EU) 2026/1778 of 16 July 2026 laying down the implementation arrangements for the digital product passport registry set up under Regulation (EU) 2024/1781 of the European Parliament and of the Council, OJ L, 2026/1778, 17.7.2026. ELI.

[14] European Commission, "The Digital Product Passport Registry is now live", 20 July 2026, https://single-market-economy.ec.europa.eu/news/digital-product-passport-registry-now-live-2026-07-20_en

[15] The different obligations of economic operators under the ESPR are set out in Articles 27 to 38. Under the ESPR, DPP compliance responsibility follows the standard EU product-law allocation: manufacturers bear primary responsibility under Article 27, importers assume the manufacturer's full obligations under Article 29 for non-EU-made products, and authorised representatives may act only within a limited mandate that excludes core Article 27.1 duties and technical documentation. Distributors carry a narrower, verificatory role — checking that required information and DPP access are present before supply, without generating the underlying compliance data themselves. For a textile SME sourcing from non-EU manufacturers, this means it will bear full DPP compliance responsibility as importer, making advance contractual assurance of supplier data essential.

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In addition, according to the Implementing Regulation 2026/1778, the DPP Registry will host a technical component — data models, structures, and semantic definitions — for all relevant data points, ensuring harmonised data usage. It's worth noting that, while the Registry offers a common EU-level index, the DPP itself follows a decentralised model: product data remains the responsibility of the relevant economic operators, who may host it themselves or through DPP service providers[16], and who must make the required information available in accordance with Union legislation.

On 17 July 2026, the European Commission launched the **Digital Product Passport web page**, *providing economic operators, public authorities, consumers and other stakeholders with a central source of information on one of the key initiatives supporting Europe's transition to more transparent product information. Developed as part of the implementation of the Ecodesign Regulation (ESPR), the DPP will make important product information more accessible throughout a product's lifecycle. The new web page explains how the DPP will work, what it means for different stakeholder groups, and how implementation will progress across product sectors*[17]. Serving as the central user interface for retrieving, searching and comparing DPP information across product groups, the web portal will support transparency, market surveillance, and informed decision-making on the part of users. The DPP Registry must be interoperable with the ESPR web portal, which will offer both public access to non-restricted information and role-based access to protected data fields, in line with the access rights set out in the relevant delegated acts.

ESPR provisions on the DPP –notably Article 9– establish the DPP framework and sets out the types of requirements that may be defined through **forthcoming product-group level delegated acts.** These provisions are complemented by Annex III, which sets out the categories of information that may be required to be made available through the DPP under Article 9.2 (a). More specifically, Annex III states:

> *The requirements related to the digital product passport laid down in the delegated acts adopted pursuant to Article 4 shall specify what data are to or can be included in the digital product passport from among the following elements:*
>
> *(a) information required under Article 7(2), point (b), and Article 7(5) or by other Union law applicable to the relevant product group;*
> *(b) the unique product identifier at the level indicated in the applicable delegated act adopted pursuant to Article 4;*
> *(c) the Global Trade Identification Number as provided for in International Organization for Standardisation/International Electrotechnical Commission standard ISO/IEC 15459-6 or equivalent of products or their parts;*
> *(d) relevant commodity codes, such as a TARIC code as defined in Regulation (EEC) No 2658/87;*
> *(e) compliance documentation and information required under this Regulation or other Union law applicable to the product, such as the declaration of conformity, technical documentation or conformity certificates;*
> *(f) user manuals, instructions, warnings or safety information, as required by other Union law applicable to the product;*
> *(g) information related to the manufacturer, such as its unique operator identifier and the information referred to in Article 27(7);*
> *(h) unique operator identifiers other than that of the manufacturer;*
> *(i) unique facility identifiers;*

[16] Article 2.32 of the ESPR defines the term 'digital product passport service provider' as a natural or legal person that is an independent third-party authorised by the economic operator which places the product on the market or puts it into service and that processes the digital product passport data for that product for the purpose of making such data available to economic operators and other relevant actors with a right to access those data under this Regulation or other Union law.
[17] New Digital Product Passport web page

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(j) information related to the importer, including the information referred to in Article 29(3) and its Economic Operators Registration and Identification (EORI) number;
(k) the name, contact details and unique operator identifier of the economic operator established in the Union responsible for carrying out the tasks set out in Article 4 of Regulation (EU) 2019/1020 or Article 15 of Regulation (EU) 2023/988, or similar tasks pursuant to other Union law applicable to the product;
(l) the reference of the digital product passport service provider hosting the back-up copy of the digital product passport.

The data carrier, the unique product identifier referred to in point (b), the unique operator identifiers referred to in points (g), (h) and (k), and the unique facility identifiers referred to in point (i) shall, where relevant for the products concerned, comply with standards ISO/IEC 15459-1:2014, ISO/IEC 15459-2:2015, ISO/IEC 15459-3:2014, ISO/IEC 15459-4:2014, ISO/IEC 15459-5:2014 and ISO/IEC 15459-6:2014.

The delegated acts adopted pursuant to Article 4 shall identify information relevant to ecodesign requirements that manufacturers may include in the digital product passport in addition to the information required pursuant to Article 9(2), point (a), including information on specific voluntary labels applicable to the product. That shall include whether an EU Ecolabel has been awarded to the product in line with Regulation (EC) No 66/2010.

The ESPR sets out a framework for establishing ecodesign requirements applicable to all physical products sold on the EU single market. Within this framework, **delegated acts** — the sector-specific acts governing product passports — play a crucial role, as they translate the broad framework into concrete, enforceable rules for individual product categories. These acts will address aspects such as durability, reusability, upgradability, reparability, energy and resource efficiency, recycled content, carbon and environmental footprint, substances of concern, waste reduction, and sustainability information (Article 8 sets out the content of the delegated acts).

The Commission is currently working on the **Delegated act for textiles** — expected around 2027. Regarding its implementation, the date of application of a delegated act shall not be earlier than 18 months from its entry into force (Article 4.4 ESPR). Textile-specific DPP requirements will be set out in the same forthcoming delegated act that introduces the ecodesign requirements themselves. We will forward analyse the specific mandatory content that the delegated acts for textile will potentially regulate in Section 2.2.1.

Harmonised standards for DPP

In July 2026, the Commission launched both the central DPP Registry and an accompanying testing environment.[18] Alongside this, the **harmonised CEN-CENELEC technical standards** — which set out how a passport is actually constructed and linked to a physical product, covering the data carrier format, the unique identifier structure, and how the system communicates with the registry — are now largely published, with the remaining references expected shortly. These are horizontal standards: they set out how a DPP functions technically (how a DPP is built, identified, stored, secured and made interoperable), but which data a given product must contain still comes from the product-group delegated acts. Applying these standards allows companies to demonstrate conformity more cost-effectively, while their modular structure limits dependence on any single technology provider, reducing vendor lock-in as the ESPR demands (Article 10.1 (d)). In short, these standards translate the ESPR's abstract and general DPP requirements into a practical, modular technical architecture on which any product sector can build.

[18] European Commission, DG GROW, "The Digital Product Passport Registry is now live", news item, 20 July 2026. https://single-market-economy.ec.europa.eu/news/digital-product-passport-registry-now-live-2026-07-20_en

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On Tuesday 14 July 2026, the Commission adopted an important Implementing Decision[19] following ESPR: **harmonised standards for digital product passports**. These standards form the technical baseline for the DPP, data carrier formats (e.g., QR code, RFID), data exchange protocols, unique identifiers, data storage, APIs for lifecycle management, and the interoperability rules manufacturers and other responsible economic operators must build into the DPP. The Decision sets out a detailed technical specification list of the referenced standards. Article 41.2 ESPR grants a presumption of conformity to products meeting these standards once they have been published in the OJEU. Citation of these references in the OJEU means that a DPP conforming to the standards is presumed to conform with the requirements of Articles 10 and 11 ESPR covered by them. The standards remain voluntary, and DPP obligations for a product group arise only once the relevant delegated act applies.[20]

While the ESPR sets out the functional requirements a DPP's data carrier must satisfy, it deliberately does not prescribe the specific technologies through which those requirements are to be met. Article 10.1 (d) requires that DPP data be based on open standards, interoperable, machine-readable and structured — but leaves the specific technical means of meeting that requirement to standardisation, and it is **Joint Technical Committee "CEN/CLC/JTC 24 — Digital Product Passport – Framework and System"**[21], established under the European Commission's standardisation request M/604[22] and secretariat-led by the German standards body DIN — that has been tasked with developing the horizontal, product-agnostic technical architecture underpinning every DPP placed on the EU market, irrespective of the product category it belongs to.

This section addresses the resulting family of **eight European standards:** six of them — EN 18216 (data exchange protocols), EN 18219 (unique identifiers), EN 18220 (data carriers), EN 18221 (data storage, archiving and persistence), EN 18222 (APIs for passport lifecycle management and searchability), and EN 18223 (system interoperability) — were published on 27 May 2026 and formally cited as harmonised standards in the Official Journal of the European Union on 15 July 2026, through Commission Implementing Decision (EU) 2026/1736; the remaining two, covering access rights and business confidentiality management (FprEN 18239), and data authentication and integrity (FprEN 18246), are still completing formal review. Because these are the standards the Commission has formally recognised as grounding a presumption of conformity with the ESPR's own technical requirements (Articles 10 and 11), to the extent covered by those standards, they are, in practical terms, the document that converts the DPP from a legal obligation into a buildable technical specification — and, unlike the sector-specific delegated acts addressed in Section 2.2.1 in this report, they apply uniformly across every product group, textiles included, once the applicable delegated act brings a given product within DPP scope.

EN 18219:2026 Digital product passport – Unique identifiers. EN 18219 sets out the principles and requirements governing how products, economic operators and facilities are to be uniquely identified within a DPP, structured around six mandatory properties — global uniqueness, persistence, correct syntax, granularity, interoperability and openness — each broken down into binding requirements and non-

[19] Commission Implementing Decision (EU) 2026/1736 of 14 July 2026 on harmonised standards for digital product passports drafted in support of Regulation (EU) 2024/1781 of the European Parliament and of the Council. ELI.

[20] As we will further analyse in Section 2.1.2 of this report, the same Article 41 ESPR creates a presumption of compliance for products awarded the EU Ecolabel: *4. Products covered by a delegated act adopted pursuant to Article 4 which have been awarded the EU Ecolabel pursuant to Regulation (EC) No 66/2010 shall be presumed to comply with the ecodesign requirements set out in that delegated act to the extent that those requirements are covered by the EU Ecolabel criteria established pursuant to Article 8 of that Regulation.*

[21] CEN/CLC/JTC 24 - Digital Product Passport - Framework and System. CEN/CLC/JTC 24 Published Standards. CEN-CLC/JTC 24, *Digital Product Passport – Framework and System* (secretariat: DIN). See CEN-CENELEC, "Digital Product Passport, the cornerstone for the implementation of sustainability and circularity on the European Single Market", 15 July 2026, https://www.cencenelec.eu/news-events/news/2026/en-in-the-spotlight/2026-07-15-dpp/

[22] COMMISSION IMPLEMENTING DECISION of 31.7.2024 on a standardisation request to the European Committee for Standardisation, the European Committee for Electrotechnical Standardisation, and the European Telecommunications Standards Institute as regards digital product passports in support of Union policy on ecodesign requirements for sustainable products and on batteries and waste batteries. C(2024)5423 – Standardisation request M/604.

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binding implementation guidance. Its most consequential feature for an implementing manufacturer is the granularity requirement, which obliges the economic operator to determine, in advance, whether a given product identifier will operate at model, batch or individual-item level, a decision that in turn conditions how the remaining standards in the series (data carriers, storage, interoperability) must be configured. Clause 5 sets out the permitted schemes for the unique product identifier itself — five alternative schemes are specified, any one of which may be used provided it independently satisfies the six governing properties — while Clause 6 sets out a separate, distinct set of permitted schemes applicable to unique economic operator and facility identifiers; in each case, the standard permits identifiers to be issued either through a recognised issuing agency, such as GS1, or through a self-issuing scheme managed by the operator itself, so long as the chosen approach meets the same substantive requirements. The practical implication worth flagging is that this choice of scheme and granularity level is not a purely technical decision to be left to an IT function: it is the foundational choice on which the DPP data architecture, and its conformity with the corresponding requirements of Article 12 ESPR on unique identifiers, will depend.

This standard must be addressed first, since every other component of the DPP system depends on it. The standard covers three identifiers: product identifier (identifies the product itself); economic operator identifier (identifies the company legally responsible for the accuracy of the information); facility identifier (identifies the site where the product was made or handled). The ESPR ultimately requires these three to be consistent with one another. That way, a regulator, a recycler or a customs officer examining a single physical item can trace it back to who made it, where it was made and which model it is. Discussion of this standard tends to focus on the product identifier, since it involves the most decisions. The other two still matter, however: a passport with a sound product identifier but an inconsistent operator identifier would still fail to comply. As mentioned, the standard requires identifiers to meet six properties:

1. Global uniqueness. The code must be unique worldwide, not just within an internal database or a company's own product range.
2. Persistence. Once assigned, the code stays permanently linked to the same item. It may not expire, be reassigned to another product in the future, or change its meaning because of internal changes to the product catalogue.
3. Syntax. The code must follow a documented, predictable structure rather than an arbitrary string entered into a system. An unrelated third party's system must be able to recognise what type of identifier it is reading.
4. Granularity. For textile products, the economic operator must decide in advance whether each product identifier will work at model, batch or item level, a choice that shapes how the other standards in the series are applied.
5. Interoperability. The identifier must be readable by systems and software operated by others. In practice, it must resolve through a data carrier, the subject of the next standard (EN 18220), and lead to a location from which data can actually be retrieved, not merely to a well-presented label.
6. Openness. The identifier scheme cannot rely on proprietary software that only its owner can read. It must be based on an open, documented scheme that, in principle, anyone could implement.

In sum, EN 18219 governs only how the product is identified. How that identifier is physically printed or scanned is covered by EN 18220 on data carriers, the next standard in the series. How systems exchange the data linked to the identifier once it has been scanned falls under EN 18216. EN 18219 is also silent on who may access which data once it has been retrieved (addressed in FprEN 18239).

EN 18220:2026 Digital product passport – Data carriers. EN 18220 specifies the requirements for the physical data carrier linking a product to its digital product passport. Its scope covers symbology characteristics and format, error-correction codes, encoding methods, printing and production quality, and

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durability. It further requires graphical or other indicators enabling the carrier to be readily recognised, and addresses carrier placement on the product, its packaging or accompanying documentation, together with machine readability and quality checking. Error correction is of particular practical value, since it allows a two-dimensional symbol to remain readable even when partially damaged, obscured or soiled. The standard admits two-dimensional barcodes (QR codes and Data Matrix symbols) and radio-frequency technologies (RFID, including NFC). Industry practice is converging on GS1 Digital Link syntax encoded in a QR code or Data Matrix, since that approach meets the ISO/IEC 15459 series to which Annex III ESPR refers; this convergence is a market practice, not a legal requirement. The standard expressly excludes system architecture, DPP use cases, secure elements and cryptographic security features for unique product identifiers. Pursuant to Article 41.2 ESPR, a DPP conforming to EN 18220 is presumed to conform with the corresponding requirements of Articles 10 and 11 ESPR, to the extent the standard covers them. For a textile SME, a plain hyperlink, or a QR code pointing to a product webpage, will not satisfy the standard on its own, because what is assessed is the carrier's encoding structure, durability and machine-readability. The standard addresses durability only in general terms. Resistance to textile-specific stresses such as washing, abrasion and light exposure should therefore be validated on the actual substrate and label method intended for production; whether product-specific durability conditions will be set in the apparel delegated act remains to be seen.

EN 18216:2026 Digital product passport – Data exchange protocols. EN 18216 governs how passport data is transmitted between the systems of the various actors entitled to access it — manufacturers, retailers, repairers, recyclers, and market surveillance or customs authorities — once a product has been identified under EN 18219 and its identifier physically carried under EN 18220. The standard requires that DPP data be exchanged in structured, machine-processable formats, specifying JSON, XML and JSON-LD as the accepted representations, transmitted over secure, authenticated network protocols such as HTTPS over TLS, and it further references established frameworks for role-based access control and secure exchange, including OAuth 2.0 and OpenID Connect. Its decisive practical effect is to exclude, from the standard's own reference architecture, an unstructured or human-readable presentation of DPP information — a webpage or PDF document, however accurate its content, does not satisfy this standard, since what is being tested is whether a counterparty's system can programmatically retrieve and parse the same record without manual data entry. As with its counterpart standards, an informative Annex ZA expressly maps its provisions against the corresponding essential requirements of Regulation (EU) 2024/1781, providing the documentary basis on which conformity may be demonstrated to a regulator, auditor or commercial counterparty. Satisfying this standard does not require a fully onboarded product catalogue, but does require, at minimum, a single working endpoint capable of returning a genuine structured, machine-readable record over an encrypted connection — and that, per CEN-CENELEC's own transposition rules. Under its European foreword, EN 18216:2026 must be given national-standard status in all CEN and CENELEC member countries by November 2026.[23] It has been ratified in Spain as UNE-EN 18216:2026 (July 2026; BOE of 13 August 2026)[24] and adopted in the Netherlands as NEN-EN 18216[25]; its adoption in Bulgaria could not be confirmed at the date of this report.

[23] EN 18216:2026, Digital product passport – Data exchange protocols, CEN/CENELEC, May 2026, European foreword.

[24] Spain gave EN 18216 national-standard status, by ratification, in July 2026, well before the November 2026 deadline. The Ministry of Industry and Tourism's resolution, published in the BOE of 13 August 2026 (BOE-A-2026-17708), lists the European standards ratified as Spanish standards. It includes UNE-EN 18216:2026, corresponding to EN 18216:2026 (dated 2026-05-27), "Pasaporte digital de producto. Protocolos de intercambio de datos", ratified by the Asociación Española de Normalización (UNE) in July 2026. https://www.boe.es/boe/dias/2026/08/13/pdfs/BOE-A-2026-17708.pdf In fact, UNE's page for technical committee CTN 333 (Pasaporte digital de producto) lists all eight standards as "Ratificada", status "VIGENTE" (in force), dated 2026-07-01. https://www.une.org/encuentra-tu-norma/comites-tecnicos-de-normalizacion/comite?c=CTN+333

[25] NEN, the Dutch national standards body, published a news item on the new DPP standards. It refers to the standard by its Dutch national designation, NEN-EN 18216 ("Digital product passport – Data exchange protocols"), describing it as setting rules for data exchange and data formats. It also says the European standards were drafted with input from the Dutch standards committee "Digital Product Passports". https://www.nen.nl/nieuws/actueel/nieuwe-europese-normen-geven-organisaties-houvast-bij-digitaal-productpaspoort/

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EN 18221:2026 Digital product passport – Data storage, archiving, and persistence. EN 18221 addresses a dimension of DPP compliance that is easily overlooked precisely because it concerns the long-term survival of passport data rather than its initial creation. The standard mandates a decentralised storage architecture, an archiving function capable of preserving historical versions of a product's passport data — of direct relevance to market surveillance authorities seeking to reconstruct a product's compliance history over time — and, critically, a persistence obligation requiring that DPP data remain accessible even after the economic operator that originally created it ceases to exist, achieved through defined replication arrangements between economic operators and designated back-up operators, together with rules governing minimum data retention periods. On this basis, a passport hosted solely on a company's own website or self-managed server infrastructure does not, without more, satisfy the standard, since that arrangement offers no continuity once the hosting entity's domain lapses or the company itself dissolves. For a textile SME, satisfying EN 18221 is properly understood as a contractual and business-continuity question as much as a technical one, and any DPP service provider selected by the SME must be asked directly, and in writing, what continuity or escrow arrangement applies to hosted passport data in the event that either party ceases operations — a named back-up operator or equivalent commitment, rather than a live replication system, may be sufficient to demonstrate conformity with this standard's persistence requirement at this stage.

EN 18222:2026 Digital Product Passport – Application Programming Interfaces (APIs) for product passport lifecycle management and searchability. EN 18222 specifies, at a technology-neutral level, the API operations required to create, read, update, delete and search DPP data throughout a product's lifecycle, together with a detailed REST-over-HTTP implementation mapping. The standard organises these operations into distinct API surfaces: a lifecycle API supporting mandatory read and CRUD operations on a passport as a whole, including transitions between defined status values such as active, recalled and decommissioned, and retrieval of the version of a passport that was current as of a specified timestamp; a separate registry API governing registration of the passport with the DPP Registry addressed earlier in this report; and a fine-grained API permitting read and update operations on individual data elements within a passport rather than the full document. On this basis, a product information system limited to a manually maintained webpage or content-management interface does not satisfy this standard, since its requirements are directed specifically at machine-callable, programmatic operations rather than human-edited publication workflows; a single functioning endpoint implementing one of the defined methods against even a single stock-keeping unit may be, however, sufficient to demonstrate the required architecture. Product information management and lifecycle systems built for internal reporting purposes are frequently not structured to expose external, machine-to-machine API responses of the kind this standard requires, and closing that gap is likely to take materially longer than populating the underlying data itself.

EN 18223:2026 Digital Product Passport – System interoperability. EN 18223 establishes the shared semantic and structural layer that sits beneath every DPP regardless of the product category it describes, defining a common information model, metadata formats and rules governing how product-group-specific data dictionaries must be constructed, such that each individual data element carries a machine-readable definition drawn from a shared semantic repository rather than an internally devised field name. In practical terms, this requires an economic operator's data fields to be mapped against recognised external classification vocabularies — such as those maintained by GS1, ECLASS, UNSPSC or ETIM — so that a customs authority's system, a repairer's system, or an automated third-party agent can correctly interpret a passport's content without a bespoke, one-off integration built for that counterparty alone. A product information system limited to free-text, prose-style descriptions cannot satisfy this standard, since it possesses no underlying field structure capable of being mapped to an external vocabulary in the first place; a simple crosswalk table linking an operator's internal field names to the corresponding external vocabulary terms, even covering only part of the relevant dataset, may be sufficient to demonstrate that the underlying data model has been built for external, machine-based interpretation rather than mere human

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display. This standard carries particular strategic relevance for this report: because it defines the structural layer shared across all product categories rather than any one sector, it is what determines whether a textile SME — or, more broadly, the LIFE DPP-TEX project's CircularPass platform — can reuse a single internal data architecture across multiple product groups as further ESPR delegated acts are adopted over time, or will instead be required to build a separate, incompatible architecture for each one; investing in alignment with recognised vocabularies at the outset is accordingly likely to reduce, rather than merely defer, future compliance cost.

The six first published standards correspond to the distinct phases involved in reading a DPP from a physical product. Figure 1 sets out a suggested order for implementing the eight standards, based on their build dependencies: each step relies on the decisions taken in the previous one.[26]

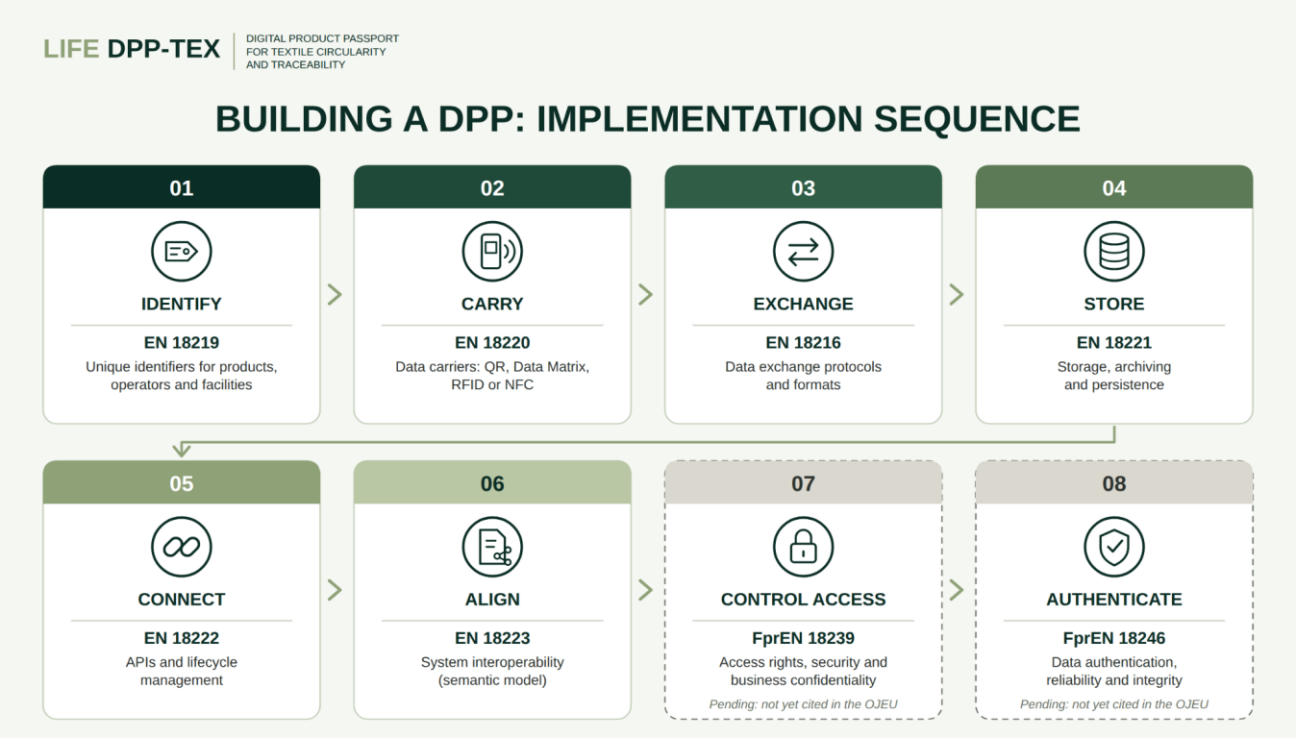


Figure 1. Building a DPP: suggested implementation sequence of the European standards. Source: own elaboration.

FprEN 18239 Digital Product Passport – Access rights management, information system security, and business confidentiality. FprEN 18239 remains, as of the most recent information available, a final draft that completed its formal vote in mid-July 2026 and that, at the date of this report, it has not yet been cited as a harmonised standard in the Official Journal and does not, at this stage, carry a presumption of conformity with the ESPR. Once published, it is expected to govern which categories of actor — market surveillance and customs authorities, repairers, recyclers, or other parties demonstrating a legitimate interest as set out in Article 11 (b) ESPR — may access which tier of passport data, the applicable information-security and data-protection requirements, and how responsibility for access management is to transfer between successive economic operators as a product changes hands, potentially over an ownership chain extending a decade or more; the standard's own scope confirms that specific access-tier allocations will still be defined by product-group in the respective delegated acts, meaning this standard supplies the governance framework rather than a finished, product-ready access matrix. For this report's purposes, the absence of a citation to date should not be read as licence to defer preparatory work,

[26] Suggested implementation sequence of the DPP standards (sequence based on G. Managò, "Digital Product Passport August Update", The Sustainability Manager, 19 August 2026).

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although the final text may still be adjusted before publication; an SME can reasonably begin classifying its own passport data now into public, commercially confidential and regulator-only tiers — an exercise properly understood as a data-governance and legal-classification task for the organisation itself, rather than a technical configuration step that can simply be delegated to an IT or software supplier once the standard is formally cited.

FprEN 18246 Digital Product Passport – Data authentication, reliability and integrity. FprEN 18246 closed formal voting in mid-2026 and, like FprEN 18239, remained pending publication as an approved standard; it accordingly does not yet carry a presumption of conformity. Its function is to establish the mechanisms by which a passport's data can be proven genuine and tamper-evident across multiple actors, sectors and languages, principally through a framework built around a secure Electronically Signed Data Construct, implementable via recognised technical mechanisms such as W3C Verifiable Credentials, an eIDAS-based Electronic Attestation of Attributes, an ISO 22376 Visible Digital Seal, or an ISO/IEC 20248 digital signature data structure, coupled with an audit trail capable of both detecting and attributing unauthorised alteration of passport data. The standard's scope, as currently drafted, is confined to authenticating the digital data record itself, and does not extend to binding that authentication to physical anti-counterfeiting features on the product — meaning EN 18246, even once formally cited, is likely to establish that a given passport's data has not been tampered with in transit, but not, by itself, that the physical product bearing that passport is not counterfeit; the standard's own scope statement confirms that cryptographic security features tied to the physical data carrier fall outside its remit. Logically, this standard functions as the capstone of the series addressed in this section: since it certifies the trustworthiness of the identifiers, carriers, exchange protocols, storage and access architecture defined by the preceding seven standards, there is little for it to authenticate until those underlying layers are themselves in place.[27]

The table below summarises the European technical standards for the DPP (six cited as harmonised standards) developed by CEN/CLC/JTC 24 to support the DPP under the ESPR, setting out for each one its reference, name, a brief summary of its scope, and its current publication and Official Journal citation status. All eight share the same parent legal basis: they were developed by CEN/CLC/JTC 24, secretariat-held by DIN, under the European Commission's standardisation request M/604, and — once cited by the Commission in the OJEU — each grounds a presumption of conformity with the corresponding provisions of the ESPR pursuant to Article 41.2 of Regulation (EU) 2024/1781. As set out in the table, six of the eight standards have already achieved both publication and Official Journal citation, while the two remaining standards, addressing access rights and data authentication, as mentioned, remained pending citation and should be treated, for now, as a watch item rather than a settled compliance route.[28] The table is intended to give the reader a single point of reference distinguishing which standards currently carry legal weight for demonstrating ESPR compliance and which do not yet do so.

Ref. and Name	Brief summary	CEN-CENELEC Publication	OJ Citation (presumption of conformity)	Phase	Function
EN 18216 DPP – Data exchange protocols	Defines the structured, machine-readable formats (JSON, XML, JSON-LD) and secure transmission protocols	Published 27 May 2026	**Cited** — Commission Implementing Decision (EU)	Access the data	Language, format and data exchange protocols

[27] The practical implementation guidance in this subsection draws on G. Managò, 'Digital Product Passport August Update', The Sustainability Manager, 19 August 2026, https://gianlucamanago.substack.com/p/digital-product-passport-august-update.
[28] As of 26 October 2026, FprEN 18239 and FprEN 18246 had not been cited in the Official Journal and therefore did not yet confer a presumption of conformity under Article 41.2 ESPR.

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	(HTTPS/TLS) through which DPP data moves between authorised systems.		2026/1736, adopted 14 July 2026, published in OJ 15 July 2026		
EN 18219 DPP – Unique identifiers	Sets requirements for globally unique, persistent identifiers for products, economic operators and facilities, at model, batch or item-level granularity.	Published 27 May 2026	**Cited** — same Decision as above	Read the code and call the API	Unique identifier and the communication or API channel
EN 18220 DPP – Data carriers	Specifies requirements for the physical carrier (QR code, Data Matrix, NFC, RFID) linking a product to its DPP, including encoding, durability and placement.	Published 27 May 2026	**Cited** — same Decision as above	Scan the physical label	QR, RFID or other physical data carriers
EN 18221 DPP – Data storage, archiving, and data persistence	Requires decentralised storage, historical-version archiving, and data persistence (via back-up operators) so passport data outlives the issuing economic operator.	Published 27 May 2026	**Cited** — same Decision as above	Download and display	Technical server, storage, archiving and data persistence
EN 18222 DPP – APIs for the product passport lifecycle management and searchability	Standardises the machine-callable APIs for creating, reading, updating and searching passport data across its lifecycle (active/recalled/decommissioned).	Published 27 May 2026	**Cited** — same Decision as above	Read the code and call the API	Unique identifier and the communication or API channel
EN 18223 DPP – System interoperability	Defines the shared semantic/information model and data-dictionary rules so passport data maps to recognised vocabularies (GS1, ECLASS, UNSPSC, ETIM) across sectors.	Published 27 May 2026	**Cited** — same Decision as above	Translate and interpret	Semantic interoperability model
FprEN 18239 DPP – Access	Will govern role-based access tiers, IT security,	Formal voting	**Not cited** as of the	—	—

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rights management, information system security, and business confidentiality	data protection, and transfer of access responsibility between economic operators over a product's ownership chain.	completed in mid-2026; final publication and citation in the OJEU remain pending as of the release of this report (October 2026)	release of this report (October 2026)		
FprEN 18246 DPP – Data authentication, reliability and integrity	Will govern how passport data is proven genuine and tamper-evident (Electronically Signed Data Construct), to counter fraud and counterfeit passports — data-level, not physical-product, authentication.	Formal voting completed in mid-2026; final publication and citation in the OJEU remain pending as of the release of this report (October 2026)	**Not cited** as of the release of this report (October 2026)	—	—

Table 3. CEN-CENELEC technical standards for DPP overview.

The foregoing analysis has addressed the substantive content of the ESPR, together with its delegated acts and implementing decisions adopted to date. The analysis now turns to the specific content requirements applicable to the DPP under the ESPR.

ESPR requirements for the DPP

Article 5.1 of the Regulation sets out the **product aspects** around which performance requirements may be built — effectively the menu that every subsequent delegated act will draw upon. It covers sixteen aspects:

(a) durability;

(b) reliability;

(c) reusability;

(d) upgradability;

(e) repairability;

(f) the possibility of maintenance and refurbishment;

(g) the presence of substances of concern;

(h) energy use and energy efficiency;

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(i) water use and water efficiency;

(j) resource use and resource efficiency;

(k) recycled content;

(l) the possibility of remanufacturing;

(m) recyclability;

(n) the possibility of the recovery of materials;

(o) environmental impacts, including carbon footprint and environmental footprint;

(p) expected generation of waste.

Article 5.9 also draws a clear line between the two types of requirements. **Performance requirements** (Article 6) set qualitative or quantitative thresholds against these aspects — a minimum percentage of recycled content, a restriction on a substance, a durability test a product must pass. **Information requirements** (Article 7) shall, as appropriate, include requirements on the DPP data set out in Article 9.2 and Annex III, together with disclosure of substances of concern, regardless of whether a performance threshold has yet been set for that aspect.

Article 5 also builds in safeguards on what performance requirements may demand: they must not significantly impair a product's functionality or safety, disproportionately undermine affordability, create disproportionate competitive harm — particularly for smaller manufacturers — force proprietary technology onto the market, or impose a disproportionate administrative burden.

ESPR sets out a number of essential **DPP requirements** for the purposes of compliance (Articles 9-11). Article 9 states that *the requirements related to the digital product passport laid down in the delegated acts adopted pursuant to Article 4 shall, as appropriate for the product groups covered, specify the following:*

(a) the data to be included in the digital product passport pursuant to Annex III;

(b) one or more data carriers to be used;

(c) the layout in which the data carrier is to be presented and its positioning;

(d) whether the digital product passport is to be established at model, batch or item level, and the definition of such levels;

(e) the manner in which the digital product passport is to be made accessible to customers before they are bound by a contract for sale, hire or hire purchase, including in the event of distance selling;

(f) the actors that are to have access to data in the digital product passport and to what data they are to have access;

(g) the actors that are to create a digital product passport or update the data in a digital product passport and what data they may introduce or update;

(h) the detailed arrangements for introducing or updating data;

(i) the period during which the digital product passport is to remain available, which shall correspond to at least the expected lifetime of a specific product.

At present, these requirements may be classified into three principal categories, namely: **general requirements, access requirements,** and **data requirements.** Table 4 below provides a summary of the aforementioned requirements established under the ESPR.

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Overview of the essential requirements of a DPP under the ESPR		Source
General requirements	DPP should be available in accordance with the applicable delegated acts adopted pursuant to Article 4.	9.1 ESPR
	A DPP should comply with the essential requirements.	10.1 ESPR
	DPP must be connected through a data carrier to a persistent unique product identifier (UPI).	10.1 (a) ESPR
	The data carrier shall be physically present on the product, its packaging or on documentation accompanying the product, as specified in the applicable delegated act.	10.1 (b) ESPR
	The data carrier and the unique product identifier shall comply with one or more of the standards referred to in Annex III, second paragraph, or equivalent European or international standards until the references of harmonised standards are published in the Official Journal of the European Union.[29]	10.1 (c) ESPR
	The DPP must be fully interoperable with other DPPs, in relation to the technical, semantic and organisational aspects of end-to-end communication and data transfer;	11 (a) ESPR
	Customers, manufacturers, importers, distributors, dealers, professional repairers, independent operators, refurbishers, remanufacturers, recyclers, market surveillance authorities and customs authorities, civil society organisations, trade unions and other relevant actors must have free of charge and easy access to the DPP based on their respective access rights set out in the applicable delegated act.	11 (b) ESPR
	The DPP must be stored by the economic operator responsible for its creation or by DPP service providers	11 (c) ESPR
	Where a new DPP is created for a product that already has a DPP, the new DPP must be linked to the original DPP or passports	11 (d) ESPR
	The DPP must remain available for the period specified in the delegated acts (at least the expected lifetime of a specific product), including after an insolvency, a liquidation or a cessation of activity in the Union of the economic operator responsible for the creation of the DPP.	11 (e) ESPR
	DPPs must be designed and operated so that a high level of security and privacy is ensured and fraud is avoided.	11 (h) ESPR
Access requirements	The access to data included in the DPP must be regulated in accordance with the essential requirements set out in Article 10 and Article 11 and with the specific access rights at product group level as	10.1 (g) ESPR

[29] Six out of eight standards — EN 18216 (data exchange protocols), EN 18219 (unique identifiers), EN 18220 (data carriers), EN 18221 (data storage, archiving and persistence), EN 18222 (APIs for passport lifecycle management and searchability), and EN 18223 (system interoperability) — were published on 27 May 2026 and formally cited as harmonised standards in the Official Journal of the European Union on 15 July 2026, through Commission Implementing Decision (EU) 2026/1736 of 14 July 2026 on harmonised standards for digital product passports drafted in support of Regulation (EU) 2024/1781 of the European Parliament and of the Council. ELI.

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	specified in the applicable delegated act.	
	The rights to introduce, modify or update data in the DPP shall be restricted based on the access rights specified in delegated acts.	11 (f) ESPR
Data requirements	The data in the DPP must be accurate, complete and up to date.	9.1 ESPR
	All data included in the DPP must be based on open standards, developed with an interoperable format, and shall be, as appropriate, machine-readable, structured, searchable, and transferable through an open interoperable data exchange network without vendor lock-in.	10.1 (d) ESPR
	Personal data relating to customers should not be stored in the DPP without their explicit consent.	10.1 (e) ESPR
	The data included in the DPP must refer to the product model, batch or item as specified in the delegated act.	10.1 (f) ESPR
	Where other Union law requires or allows the inclusion of specific data in the DPP, those data may be included in the DPP pursuant to the applicable delegated act	10.2 ESPR
	Data authentication, reliability and integrity shall be ensured.	11 (g)

Table 4. Overview of the essential requirements of a DPP under the ESPR.

Besides the requirements under ESPR, the DPP should include all mandatory information listed in the upcoming product group-specific delegated act. The ESPR also requires that information made available through the DPP be accurate and consistent with the product placed on the market, and that it be provided in the manner and at the time specified in the applicable delegated act. The detailed obligations governing the content, timing, accessibility and updating of DPP information are to be set at product-group level through those delegated acts. While this provides a general overview of the requirements currently in force, it should be noted that more detailed provisions governing DPP requirements are anticipated to be issued through product-group delegated acts adopted by the Commission, for textiles indicatively in 2027.

2.1.2 Related EU Laws

While the ESPR establishes the mandatory, cross-cutting requirements that apply to all DPPs, it does not operate in a vacuum: a number of other regulatory frameworks impose additional reporting duties for textile products. The DPP itself is built on top of this small number of framework regulations, supplemented by a growing list of delegated acts; it interlinks with existing regulations, acting as the digital connector linking all these frameworks. This section presents the legislation that defines the disclosure obligations relevant to the potential content of the DPP and its operativity and technical implementation. The following instruments materially shape what data is required, who can access it, and how it must be published, among other parameters. In summary, these are related initiatives — essentially Regulations, Directives, and their delegated and implementing acts — most of which do not themselves refer to the DPP (although several are expressly cross-referenced by the ESPR (see Annex III, group B)), but in respect of which the DPP could nonetheless have a significant impact and support organisations in their compliance efforts.

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REACH, Regulation (EC) 1907/2006. REACH, Regulation (EC) 1907/2006, functions as the substantive foundation on which the DPP's substances-of-concern provisions are built. The ESPR establishes the obligation to disclose information on substances of concern under Article 7.5, specifying the required data fields — a substance's name, its location within the product, its concentration, safe-use instructions, and end-of-life management information — but it is REACH's own registration, evaluation, authorisation and restriction machinery that supplies the underlying chemical-safety determinations this disclosure draws upon. Moreover, Article 2 (27) ESPR defines a "substance of concern" by direct reference to REACH (Articles 57 and 59.1), so we have an express textual link between the two regulations. Substances of Very High Concern are identified against the substantive criteria set out in Article 57 REACH, but it is the separate identification procedure under Article 59.1 that results in a substance's formal inclusion on the European Chemicals Agency (ECHA) Candidate List — the correct citation for that specific step, and one worth stating precisely given how frequently the two provisions are conflated. It should also be noted that the ESPR's own concept of a "substance of concern" is not necessarily coextensive with the REACH Candidate List: it is capable of being broader, with the precise scope, the categories of person entitled to access the resulting DPP data, and the date from which disclosure applies all left to the relevant product-specific delegated act.

The operative mechanism at supply-chain level today is REACH Article 33, which requires any supplier of an article containing a Candidate List substance above a concentration of 0.1% weight by weight to communicate that fact — at minimum, the substance's name and sufficient information for safe use — automatically to business customers under Article 33.1, and to consumers on request, free of charge and within 45 days, under Article 33.2. Following the Court of Justice's ruling in Case C-106/14 ("Once an Article, Always an Article," 2015), this threshold must be assessed component by component within a complex product, rather than against the finished article as a whole — a point of practical significance for any textile product incorporating multiple treated, coated or trimmed elements.

The relationship between REACH and the ESPR is complementary, and overlaps substantially in practice, rather than one of strict substantive dependency. REACH remains the principal Union framework for chemical-substance controls and for the specified supply-chain communication concerning substances in articles under Article 33. The ESPR separately provides a framework under which product-specific delegated acts may impose information requirements concerning substances of concern and may require that information to be made available through a DPP — a category that is not necessarily coextensive with the REACH Candidate List, and whose precise content, scope of authorised access, and applicable date will depend entirely on the delegated act for the product group concerned. Where such requirements are adopted, the DPP's function is to make REACH-derived substance data accessible, in structured and machine-readable form, to a broader range of value-chain actors — including recyclers and market surveillance authorities — than REACH's own communication mechanisms typically reach.

For a textile SME, robust and traceable supplier documentation concerning substance identity, concentration, location and safe use is accordingly an important compliance-readiness measure. It is likely to support compliance once a future textile-specific delegated act imposes corresponding requirements, but it does not create a present textile-DPP obligation, and it does not substitute for independent, ongoing REACH compliance.

One further, current development remains relevant to the broader chemical-traceability ecosystem the DPP will sit within: the Commission has floated a proposal[30] that would repeal the existing obligation to report data to the Substances of Concern In articles as such or in complex objects (Products) database – SCIP database – (the substance-in-article notification system currently required under the Waste Framework

[30] COM(2025) 986 final — Proposal for a Directive of the European Parliament and of the Council amending Directive 2008/98/EC on waste (Waste Framework Directive), Brussels, 10.12.2025. EUR-Lex CELEX number: 52025PC0986. Specifically, the proposal amends Article 9 of the Waste Framework Directive to remove the SCIP reporting obligation. It forms one of six proposals published together on 10 December 2025 as part of the Commission's "Environmental Omnibus" package.

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Directive). The proposal is pending and remains with the European Parliament and Council as co-legislators and has not been adopted; SCIP notification obligations therefore remain fully in force and enforceable in the interim.

Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), establishing a European Chemicals Agency, amending Directive 1999/45/EC and repealing Council Regulation (EEC) No 793/93 and Commission Regulation (EC) No 1488/94 as well as Council Directive 76/769/EEC and Commission Directives 91/155/EEC, 93/67/EEC, 93/105/EC and 2000/21/EC. ELI.			
Type of Act	Regulation		
Status	In force, as amended		
Brief summary	REACH determines which substances qualify as "substances of concern" (via SVHC identification) and Article 33 already requires suppliers to communicate their presence above 0.1% w/w — the DPP doesn't replace this, but acts as the structured, machine-readable channel making that same REACH-derived data accessible to a wider set of actors (recyclers, market surveillance) under ESPR Article 7.5.		
Impact on LIFE DPP-TEX	Medium		
National transposition (ES/BG/NL)	N/A — directly applicable		
Key dates	Adoption date	OJEU publication	Entered into force
	18 December 2006	30 December 2006	1 June 2007

Table 5. Legislation Overview.

Classification, Labelling and Packaging of chemicals (CLP), Regulation (EC) 1272/2008. The CLP Regulation performs a function analogous to, but distinct from, REACH within the DPP framework: while REACH determines which substances qualify as substances of concern, CLP supplies the hazard classification data that gives those substances their regulatory meaning — the hazard classes, categories, and associated pictograms, signal words, and hazard statements that communicate the nature of a chemical risk. Where the ESPR's substances-of-concern provisions (Article 7.5 ESPR) require disclosure of a substance's identity, location, and concentration within a product, it is CLP's harmonised classification and labelling system that underpins the "safe use instructions" component of that disclosure (Article 7.5 (d)), since those instructions are typically derived from — or must remain consistent with — the hazard classification and labelling requirements a substance already carries under CLP. This means the chemical hazard data integrated into the DPP is strictly governed by the standardized classification and hazard communication framework established under the CLP Regulation, serving as the mandatory reference for identifying, classifying, and labelling chemical hazards, ensuring that any toxicological or ecotoxicological risks associated with substances, mixtures, or finishes applied to textile products are communicated uniformly.

This linkage extends beyond textiles into any product category where the DPP must convey chemical hazard information to downstream users, but it is equally relevant to textiles insofar as dyes, finishing agents, flame retardants, and other treatment chemicals used in textile manufacturing are themselves subject to CLP classification. In practice, this means that a textile manufacturer's DPP disclosures on substances of concern cannot be drafted independently of the CLP classification already assigned to those substances by

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their chemical suppliers: the hazard statements and safe-handling information generated under CLP's labelling regime become source data that feeds directly into the DPP's substance-related fields. For an SME, this reinforces the same practical point as with REACH: the completeness of chemical hazard documentation obtained from suppliers under CLP will directly condition the organisation's ability to populate the corresponding DPP fields accurately once the applicable delegated act enters into force.

As with REACH, Article 2 (27) ESPR contains a direct reference to Regulation (EC) No 1272/2008. The same operational link also works here: DPP does not replace or duplicate CLP's own labelling obligations; rather, it acts as an additional, structured channel through which CLP-derived hazard information is made traceable and accessible to a wider set of value-chain actors — including recyclers assessing whether hazardous substances affect end-of-life processing options — beyond the physical label or safety data sheet that CLP itself mandates. Consequently, the ESPR does not impose parallel chemical assessment obligations; rather, it leverages the substantive hazard classifications of CLP and the registration data of REACH, utilizing the DPP as the definitive digital vehicle to guarantee regulatory transparency and chemical safety throughout the product's entire life cycle.

Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No 1907/2006. ELI.	
Type of Act	Regulation
Status	In force
Brief summary	Hazard data referenced in DPP for chemicals. CLP supplies the hazard classification data behind the DPP's "safe use instructions" for substances of concern (Article 7.5 (d) ESPR), with textile dyes and finishes carrying supplier-set classifications. Like REACH, the DPP channels this data rather than duplicating CLP's own labelling duties.
Impact on LIFE DPP-TEX	Low

Table 6. Legislation Overview.

Waste Framework Directive (WFD), Directive 2008/98/EC[31]. The WFD (as amended by Directive (EU) 2018/851[32] and, most recently, Directive (EU) 2025/1892[33]) constitutes the principal Union instrument governing the end-of-life stage of a product's lifecycle, and as such intersects with the DPP framework at precisely the point where the ESPR's own competence ends. Whereas the ESPR governs a product's design, placing on the market, and the informational content that must accompany it throughout its useful life, the WFD governs what happens once that product becomes waste — collection, treatment, recycling, and, since the 2025 amendment, a harmonised EPR regime for textiles and footwear. The DPP therefore functions as the informational bridge between the two regimes: the composition, material, and substance data mandated under the ESPR is precisely the data a waste operator, recycler, or EPR scheme would require to fulfil obligations arising under the WFD, even though the WFD itself does not directly reference the DPP as an instrument.

The clearest point of formal convergence between the two instruments arises from Directive (EU) 2025/1892, which establishes the Union's first harmonised EPR regime for textiles, textile-related products

[31] Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives. ELI. Waste Framework Directive - Environment - European Commission.
[32] Directive (EU) 2018/851 of the European Parliament and of the Council of 30 May 2018 amending Directive 2008/98/EC on waste. ELI.
[33] Directive (EU) 2025/1892 of the European Parliament and of the Council of 10 September 2025 amending Directive 2008/98/EC on waste. ELI.

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and footwear. That Directive requires that the fees charged by producer responsibility organisations be modulated by reference to the ecodesign requirements adopted under the ESPR — meaning that a producer's EPR fee obligations under the WFD framework will, as a matter of law, be calculated in part by reference to ESPR-derived criteria. This is the most significant provision linking the two regimes; the WFD does not create ecodesign requirements of its own, but consumes and depends upon those the ESPR establishes, with the DPP serving as the practical vehicle through which the relevant product-level data is made available for that purpose.



Figure 2. Waste hierarchy under Article 4.1 of Directive 2008/98/EC (Waste Framework Directive). Source: own elaboration.

For a textile SME, this linkage carries a further compliance nuance: the two regimes' scopes do not fully coincide. The textile EPR regime covers the products listed by Combined Nomenclature code in Annex IVc of the WFD, as amended by Directive (EU) 2025/1892. It applies to products for household use and to products for other uses, including professional uses, where they are similar in nature and composition to household products. Professional or military products that may pose safety, health or hygiene risks or raise security concerns, such as protective equipment, are excluded (Recital 28 of Directive (EU) 2025/1892). The ESPR's ban on destroying unsold goods (Article 25.1 ESPR), by contrast, applies only to "consumer products" as defined in Article 2 (36) ESPR. A given item of workwear may therefore be subject to textile EPR obligations while falling outside the destruction ban, or vice versa.

In addition, operators supplying used products that have been assessed as fit for re-use, or products derived from used or waste products or their parts, including upcycled textiles, are not considered "producers" for the purposes of the textile EPR regime (Article 3.4 (b) WFD and Recital 22 of Directive (EU) 2025/1892). This is directly relevant to reuse and upcycling activities such as those in the Spanish pilot (WP5): the operator placing such products on the market would not bear EPR producer obligations for them, although the original producer's obligations for the new products it placed on the market remain unaffected.

Finally, two EU-level dates should not be conflated: the transposition deadline for Directive (EU) 2025/1892 (17 June 2027[34]) and the date by which national textile EPR schemes must be operational (17 April 2028[35]).

[34] The general transposition deadline for the Waste Framework Directive (WFD) amendment—Directive (EU) 2025/1892, amending Directive 2008/98/EC on waste—is 17 June 2027. Article 2(1) requires Member States to bring into force the necessary national laws, regulations and

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Member States' implementing measures, such as Spain's draft Royal Decree on textile and footwear products, should be monitored for any national specificities.

Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives. ELI.	
Type of Act	Directive
Status	In force
Brief summary	The WFD governs end-of-life obligations including EPR, where the DPP's material data bridges into the ESPR. Textile EPR fees must be modulated against ESPR ecodesign criteria, with key deadlines (2027 transposition, 2028 EPR schemes) ten months apart. Suppliers of reused or upcycled textiles are not 'producers' under the textile EPR regime (Art. 3.4 (b) WFD).
Impact on LIFE DPP-TEX	Medium

Table 7. Legislation Overview.

Corporate Sustainability Reporting Directive (CSRD), Directive (EU) 2022/2464. The CSRD has itself been substantially amended by the "Omnibus I"[36] simplification package — formally Directive (EU) 2026/470 — which was adopted on 24 February 2026, published in the Official Journal on 26 February 2026, and entered into force on 18 March 2026[37]. This amendment significantly narrows the CSRD's personal scope: entity-level sustainability reporting will now apply only to EU undertakings (and relevant non-EU issuers) with a net annual turnover exceeding €450 million and an average number of more than 1.000 employees during the financial year (Article 1.3 Directive 2013/34/EU, as amended by Article 2 Directive (EU) 2026/470) a substantial increase from the original thresholds, with the new scope applicable for financial years beginning on or after 1 January 2027. For a textile SME such development is material: an SME will not itself fall within the CSRD's direct reporting obligation, and the Omnibus amendments now afford a further protection where the SME sits within a larger reporting company's value chain — undertakings with fewer than 1,000 employees are designated "protected undertakings" with a statutory right to decline information requests from CSRD-reporting counterparties that exceed the voluntary SME reporting standard.

Notwithstanding this narrowed scope, the substantive linkage between the CSRD and the DPP framework persists for any SME that continues to supply a large, CSRD-reporting undertaking, or that voluntarily wishes to demonstrate sustainability credentials to such a counterparty. The CSRD requires in-scope entities to report under the European Sustainability Reporting Standards (ESRS) — the Commission adopted the revised, simplified ESRS on 3 July 2026[38] — on matters including greenhouse gas emissions and the use of substances of concern within their value chains; the DPP, by contrast, operates at product level, generating exactly this class of data (carbon footprint, substances of concern, material composition) as a matter of ESPR compliance. Where a large undertaking remains obliged to report Scope 3 emissions or

administrative provisions by 17 June 2027, and to communicate them to the Commission. Original Official Journal source: Directive (EU) 2025/1892 — Official Journal PDF, OJ L, 2025/1892, 26 September 2025.

[35] Set out in Article 22a(14) of the amended Waste Framework Directive, inserted by Directive (EU) 2025/1892. Original Official Journal source: Directive (EU) 2025/1892 — OJ L, 2025/1892, 26 September 2025 (Official Journal PDF).

[36] Directive (EU) 2026/470 of the European Parliament and of the Council of 24 February 2026 amending Directives 2006/43/EC, 2013/34/EU, (EU) 2022/2464 and (EU) 2024/1760 as regards certain corporate sustainability reporting requirements and certain corporate sustainability due diligence requirements. ELI.

[37] Official Journal of the European Union, OJ L 2026/470, 26.2.2026 (the Directive's official publication). Entered into force: 18 March 2026 — pursuant to Article 6 of Directive (EU) 2026/470, which provides that it enters into force on the twentieth day following its publication in the Official Journal.

[38] Commission Delegated Regulation (EU) 2026/1563 of 3 July 2026 amending Delegated Regulation (EU) 2023/2772 as regards the simplification of certain sustainability reporting standards, OJ L, 2026/1563, 21.9.2026 (adopted as C(2026) 5010). ELI.

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supply-chain substance data under the ESRS, DPP-derived product data represents the most direct and structured evidentiary source available to satisfy that obligation, even though neither the CSRD nor the ESRS formally references the DPP as an instrument. The overlap is accordingly one of substantive data content and practical utility. Article 24.1 ESPR expressly allows the disclosure of discarded unsold products to be included in the sustainability report under Directive 2013/34/EU.

Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU, as regards corporate sustainability reporting. ELI.	
Type of Act	Directive
Status	In force
Brief summary	Product-level DPP data (carbon footprint, substances of concern, material composition...) serves as the most direct evidentiary source for the ESRS disclosures CSRD-obligated companies must report, even though neither instrument formally references the DPP. Most textile SMEs fall outside CSRD's own scope, but this data dependency still matters where an SME supplies a CSRD-reporting company further up the value chain.
Impact on LIFE DPP-TEX	Low

Table 8. Legislation Overview.

Corporate Sustainability Due Diligence Directive (CSDDD or CS3D), Directive (EU) 2024/1760. The CSDDD requires in-scope undertakings to identify, prevent, mitigate and account for actual and potential adverse human rights and environmental impacts arising within their own operations, those of their subsidiaries, and their chain of activities, including upstream suppliers. As with the CSRD, the CSDDD's scope has since been substantially narrowed by the same “Omnibus I” simplification package: due diligence obligations now apply to EU undertakings with more than 5,000 employees and net worldwide turnover exceeding €1.5 billion, and to comparable non-EU undertakings generating that net turnover within the Union — a considerably higher threshold than the 1,000-employee/€450 million worldwide-turnover threshold originally adopted by Directive 2024/1760[39]. Member States must transpose these amended obligations by 26 July 2028 and it will be applicable from 26 July 2029.

As with the other instruments addressed in this section, neither the CSDDD nor its implementing texts make any direct legal reference to the DPP; the linkage between the two regimes is functional rather than textual. The CSDDD's due diligence obligation requires an in-scope undertaking to map and assess adverse impacts across its chain of activities — a task that, for a textile supply chain, depends on precisely the type of granular traceability data the DPP is designed to generate under the ESPR: unique facility and operator identifiers tracing the geographic and organisational origin of materials and manufacturing processes, and substances-of-concern data bearing on both environmental impact and workplace safety conditions at the facilities concerned. Where an in-scope undertaking's due diligence obligations extend to a given supplier's facilities, DPP-derived data represents a structured and verifiable evidentiary source capable of supporting that assessment, in a manner analogous to its role in relation to the CSRD's own reporting obligations.

Given the revised thresholds, it is highly improbable that a textile SME would itself fall within the CSDDD's direct scope. The relevant exposure, as with the CSRD, is indirect: an SME situated within the supply chain of a large, CSDDD-obligated undertaking may be asked to supply chain-of-activities information as part of that undertaking's own due diligence process, and the maintenance of accurate DPP data — particularly

[39] Directive (EU) 2024/1760 of the European Parliament and of the Council of 13 June 2024 on corporate sustainability due diligence and amending Directive (EU) 2019/1937 and Regulation (EU) 2023/2859. OJ L, 2024/1760, 5.7.2024, ELI. Original text.

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regarding facility identification and substances of concern — may become a practical precondition for satisfying such requests, notwithstanding the absence of any direct statutory obligation on the SME itself under the CSDDD.

Directive (EU) 2024/1760 of the European Parliament and of the Council of 13 June 2024 on corporate sustainability due diligence and amending Directive (EU) 2019/1937 and Regulation (EU) 2023/2859. ELI.	
Type of Act	Directive
Status	In force
Brief summary	The CSDDD's due diligence obligation requires mapping adverse human-rights and environmental impacts across a supply chain — precisely the kind of facility identification and data the DPP generates under the ESPR. Textile SMEs sit outside CSDDD's own narrowed scope under "OmnibusI", but may still need accurate DPP data to satisfy due-diligence requests from a larger, CSDDD-obligated customer further up the chain.
Impact on LIFE DPP-TEX	Low

Table 9. Legislation Overview.

European Sustainability Reporting Standards (ESRS). The ESRS, originally adopted by Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023 supplementing Directive 2013/34/EU[40] (the Accounting Directive, as amended by the CSRD), constitute the detailed disclosure standards against which CSRD-obligated undertakings must report — that is, the specific topical standards and datapoints (covering, inter alia, ESRS E1 on climate change, E2 on pollution, E3 on water and marine resources, E4 on biodiversity and ecosystems, E5 on resource use and circular economy, and the corresponding social and governance standards) that give substantive content to the CSRD's otherwise general reporting obligation. Following the "Omnibus I" reform discussed above, the first set of ESRS adopted in 2023 has been substantially simplified. Delegated Regulation (EU) 2023/2772 was first amended by Delegated Regulation (EU) 2025/1416, which postponed certain disclosure requirements for undertakings already reporting. On 3 July 2026, the Commission then adopted two delegated acts, both published in the Official Journal on 21 September 2026. Delegated Regulation (EU) 2026/1563[41] revises the ESRS for undertakings within the CSRD's mandatory scope. Delegated Regulation (EU) 2026/1560[42] establishes a voluntary sustainability reporting standard, based on the VSME standard, for undertakings outside that scope, including those protected by the value-chain cap. The voluntary standard entered into force on 24 September 2026, and the value-chain cap applies to financial years beginning on or after 1 January 2027. Together, the revised standards substantially reduce the number of mandatory datapoints while preserving the principle of double materiality.

The linkage between the ESRS and the DPP framework under the ESPR is, as with the other instruments addressed in this section, one of substantive overlap rather than direct legal cross-reference. ESRS E5, governing resource use and circular economy, requires disclosure on matters including material inflows and outflows, the proportion of recycled content, and waste generation — categories of information that correspond closely to information that a delegated act may require on the basis of the product parameters in Annex I ESPR (recycled and renewable material content, waste generated, material footprint) and, more

[40] Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council as regards sustainability reporting standards. Document 02023R2772-20250101. ELI.
[41] Commission Delegated Regulation (EU) 2026/1563 of 3 July 2026 amending Delegated Regulation (EU) 2023/2772 as regards the simplification of certain sustainability reporting standards, OJ L, 2026/1563, 21.9.2026 (adopted as C(2026) 5010). ELI.
[42] Commission Delegated Regulation (EU) 2026/1560 of 3 July 2026 supplementing Directive 2013/34/EU of the European Parliament and of the Council by establishing sustainability reporting standards for voluntary use by undertakings protected by the value chain cap, OJ L, 2026/1560, 21.9.2026 (adopted as C(2026) 5011). ELI.

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broadly, ESRS E1's carbon footprint disclosures mirror the DPP's own carbon footprint data field. Similarly, ESRS E2's pollution-related disclosures intersect with the DPP's substances-of-concern requirements under Article 7(5) of the ESPR. In each instance, product-level DPP data represents a granular, structured data source capable of feeding directly into the entity-level aggregate disclosures the ESRS requires, notwithstanding that the ESRS delegated act itself makes no reference to the DPP as an instrument.

For a textile SME falling outside the CSRD's revised scope, the practical relevance of the ESRS is accordingly indirect but not negligible: to the extent the SME's larger customers remain subject to CSRD reporting obligations under the ESRS, or the SME itself elects to report under the newly adopted VSME standard to satisfy commercial counterparties' expectations, accurate DPP-derived product data — particularly on recycled content, waste, and substances of concern — will constitute the most direct available evidentiary basis for populating the corresponding ESRS or VSME datapoints, reinforcing the practical, if not formally mandated, dependency between DPP compliance and upstream sustainability reporting obligations.

Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council as regards sustainability reporting standards. ELI.	
Type of Act	Delegated Regulation
Status	In force; amended by Delegated Regulations (EU) 2025/1416 and (EU) 2026/1563
Brief summary	ESRS datapoints (E1 carbon footprint, E2 pollution, E5 resource use and recycled content) closely mirror the DPP's own mandatory data fields under ESPR, so product-level DPP data can feed directly into entity-level ESRS or VSME disclosures. For a textile SME outside CSRD's direct scope, this matters mainly where a larger customer needs that data to satisfy its own reporting obligations.
Impact on LIFE DPP-TEX	Medium

Table 10. Legislation Overview.

Digital Services Act (DSA), Regulation (EU) 2022/2065. The DSA, imposes two obligations on providers of online marketplaces that bear materially on DPP compliance, albeit without specifically referring to the passport by name. First, Article 30 establishes a "know your business customer" regime requiring marketplaces to collect and verify identifying information from traders before permitting them to offer products to EU consumers, including a self-certification by the trader committing to offer only products compliant with applicable Union law — a certification that, once a textile-specific ESPR delegated act enters into application, would necessarily encompass DPP-related obligations. Second, Article 31 imposes a "compliance by design" obligation, requiring the marketplace's online interface to be structured so as to allow traders to comply with their product-labelling and identification obligations under Union law, and requiring the marketplace to make best efforts to assess the reliability of the information provided and to conduct random checks for non-compliant listings.

The substantive counterpart to these DSA obligations is found in the ESPR itself. Article 10.3 ESPR requires the economic operator placing a product on the market to provide dealers and online marketplace providers, free of charge and within five working days of a request, with a digital copy of the data carrier or unique product identifier, so that the DPP can be made accessible to consumers who cannot physically inspect the product before purchase. Read together, the two instruments give online marketplaces a role in making DPP information accessible to consumers: the DSA supplies the trader-traceability and compliance-by-design framework (Articles 30 and 31), while the ESPR supplies the specific DPP

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information to be made available. The DSA does not, however, make marketplaces liable for the content or existence of the DPP itself, which remains the responsibility of the economic operator placing the product on the market.

A parallel obligation arises under the textile EPR regime. Under Article 22a (13) WFD, as amended by Directive (EU) 2025/1892, providers of online platforms that allow consumers to conclude distance contracts with producers, within the meaning of Article 30 DSA, must obtain from those producers their registration details in the national register of producers and a self-certification of compliance with their EPR obligations, before allowing them to offer textile products on the platform. For textile products sold online, marketplaces will therefore have to verify both DPP-related and EPR-related information supplied by traders, which reinforces the case for consistent operator identifiers across the DPP and the EPR producer register.

Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market For Digital Services and amending Directive 2000/31/EC. ELI.	
Type of Act	Regulation
Status	In force
Brief summary	Marketplace role. The DSA's marketplace obligations (trader verification under Article 30, compliance by design under Article 31) operate alongside Article 10(3) ESPR, which requires economic operators to give marketplaces a digital copy of the data carrier so that DPP information is accessible before purchase. Marketplaces thus have a role in making the DPP accessible, without being liable for its content. Under Article 22a(13) WFD, online platforms must also obtain textile producers' EPR registration details and self-certification before allowing them to sell.
Impact on LIFE DPP-TEX	Low

Table 11. Legislation Overview.

Data Act, Regulation (EU) 2023/2854. The substantive linkage between the Data Act and the DPP arises from their shared subject matter: both instruments govern access to product-generated data, but from different starting points. The Data Act establishes a horizontal right for users of "connected products" — physical goods that obtain, generate or collect data concerning their use or environment and are able to communicate that data — to access the data so generated, and to have it shared with third parties of the user's choosing, subject to fair, reasonable and non-discriminatory terms and appropriate trade-secret safeguards. The DPP, by contrast, is a sector-specific instrument under the ESPR that mandates disclosure of a defined, static-to-semi-dynamic set of product information (composition, substances of concern, durability, end-of-life instructions) to a broader range of value-chain actors. Where a product falls within both regimes — as would be the case for any future connected or IoT-enabled textile product incorporating sensors or embedded electronics — the two access frameworks could apply cumulatively.

For a conventional, non-connected textile SME, the Data Act's direct relevance is accordingly limited at present, since most textile products placed on the market will not meet the Data Act's "connected product" threshold. Its relevance would increase materially, however, if the SME's product range come to incorporate connected features (RFID-enabled traceability tags with two-way data capability, smart textiles, or similar), or if the forthcoming textile-specific ESPR delegated act itself provide for dynamic, in-life DPP updates — in which case the Data Act's access-rights and data-sharing framework would need to be read alongside, and reconciled with, the access-rights provisions the ESPR itself establishes under Articles 9.2 (f), (g) and 11 (b).

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Regulation (EU) 2023/2854 of the European Parliament and of the Council of 13 December 2023 on harmonised rules on fair access to and use of data and amending Regulation (EU) 2017/2394 and Directive (EU) 2020/1828 (Data Act). ELI.	
Type of Act	Regulation
Status	In force[43]
Brief summary	Access rights to product-generated data. Relevant for in-life DPP updates, especially for connected products. The Data Act grants users of connected products a horizontal right to access product-generated data, which would apply alongside the DPP's own access framework for any future connected or IoT-enabled textile product (e.g. RFID-enabled tags, smart textiles). For a conventional, non-connected textile SME, this has limited relevance today, but would furnish the contractual infrastructure for any in-life DPP updates if that changes.
Impact on LIFE DPP-TEX	Low

Table 12. Legislation Overview.

General Data Protection Regulation (GDPR), Regulation (EU) 2016/679. The GDPR intersects with the DPP framework principally as a constraint rather than as a source of obligation: whereas the ESPR mandates disclosure of product-related information, the GDPR governs the separate question of whether, and on what basis, any personal data that might incidentally appear within a DPP may lawfully be processed. This intersection is expressly acknowledged within the ESPR itself, which provides that personal data shall not be stored within a DPP without the explicit consent of the data subject concerned (Article 10.1 (e)) — a provision that operates as a specific application of the GDPR's own lawfulness-of-processing requirements under Article 6, and its heightened consent standard under Article 7, to the DPP context. The practical relevance of this intersection will generally be limited for a textile product's DPP, given that its mandated content (material composition, substances of concern, durability and end-of-life data) is overwhelmingly product-level rather than personal in nature; the GDPR becomes engaged principally at the margins — for instance, where a DPP incorporates repair-history records, take-back or return-scheme participation data, or facility contact details that could constitute or contain personal data relating to an identifiable natural person.

Beyond this direct textual link, the GDPR's general principles of data protection by design and by default (Article 25) bear on the architecture of any DPP-hosting system a textile SME or its service provider implements, requiring that personal-data processing risks be assessed and mitigated at the design stage of the underlying DPP infrastructure, independently of the ESPR's own technical requirements for interoperability and security under Article 11. Where an SME engages a third-party DPP service provider to host or manage passport data on its behalf, that arrangement will typically constitute processing on behalf of a controller within the meaning of Article 28 GDPR, requiring an appropriate data processing agreement

[43] The Data Act, Regulation (EU) 2023/2854, has applied since 12 September 2025, with the connected-product design obligations applying from 12 September 2026, and remains in force in its original form. On 19 November 2025, the Commission published two related proposals: a Digital Omnibus on AI, amending the AI Act, and a separate Digital Omnibus targeting the GDPR, the ePrivacy Directive, the NIS2 Directive and the Data Act, principally proposing to consolidate several adjacent instruments (the Data Governance Act, the Free Flow of Non-Personal Data Regulation, and the Open Data Directive) into the Data Act framework, recalibrate the business-to-government data access regime, and adjust cloud-switching provisions. While the AI-focused proposal has already reached a trilogue agreement (7 May 2026), the Data Act-relevant Digital Omnibus remains considerably earlier in the legislative process: as of the most recent available information, neither the Council nor the European Parliament had yet finalised its negotiating position, and trilogue negotiations on this file had not yet commenced. Critically for present purposes, and consistent with earlier analysis, nothing in the available drafting suggests the proposal reopens the Data Act's core connected-product and related-service access architecture under Articles 3 to 7 — the provisions most directly relevant to the DPP — though this specific point should be re-verified once a stable negotiating text becomes public, given how early-stage this file remains.

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between the parties — a contractual safeguard that operates independently of, but in parallel to, the SME's substantive obligations under the ESPR.

Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation). ELI.	
Type of Act	Regulation
Status	In force[44]
Brief summary	The GDPR acts mainly as a constraint rather than a source of DPP obligations: personal data cannot be stored in a DPP without explicit consent (Article 10.1 (e) ESPR), though this has limited practical relevance since DPP content is overwhelmingly product-level, engaging mainly at the margins (repair-history or contact data). Any third-party DPP service provider hosting passport data will typically require a GDPR Article 28 data processing agreement, separate from the SME's substantive ESPR obligations.
Impact on LIFE DPP-TEX	Medium

Table 13. Legislation Overview.

European Accessibility Act (EAA), Directive (EU) 2019/882. The EAA has applied since 28 June 2025 (Article 31.2). The EAA's substantive scope under Article 2 is a closed, enumerated list of specific products and services — not a general rule covering all digital interfaces. Article 2.2 lists the covered services exhaustively: electronic communications services, services providing access to audiovisual media, certain elements of passenger transport services, banking services, e-books, and e-commerce services (Article 2.2 (f)). A product or service not falling within this enumerated list is outside the EAA's scope, regardless of how consumer-facing or interactive it may be.

The accessibility requirements for services do not apply to all providers. Under Article 4.5 EAA, microenterprises providing services[45] are exempt from the accessibility requirements for services and from the related compliance obligations. A microenterprise is an enterprise employing fewer than 10 persons whose annual turnover or annual balance sheet total does not exceed EUR 2 million (Article 3.23). National transposing laws reproduce this exemption; in the Netherlands, for example, the e-commerce accessibility requirements introduced in the Civil Code do not apply to such microenterprises (Article 230fc of Book 6 of the Dutch Civil Code, as introduced by the Implementatiewet toegankelijkheidsvoorschriften producten en diensten, Stb. 2024, 87). Many textile SMEs operating a webshop will therefore fall outside the EAA's service obligations, although larger SMEs offering e-commerce services to consumers, including those using their webshop as an access point to DPP information, remain covered.

The EAA bears no direct relationship to the DPP as such — the Directive predates the ESPR by five years and makes no reference to it — but a functional overlap arises wherever an economic operator's own digital retail channel serves as the practical gateway through which a consumer accesses a product's DPP. Where that gateway takes the form of an e-commerce website or mobile application through which the operator concludes sales contracts, it falls within Article 2.2 (f) and must meet the EAA's accessibility requirements independently of any ESPR obligation; the same may apply to a physical self-service kiosk offering DPP

[44] The Commission's Digital Omnibus proposal of 19 November 2025 includes targeted recalibrations to certain GDPR concepts (including the threshold for solely automated decision-making in a contractual context), but these amendments remain under negotiation and have not entered into force, and in any event bear no direct relationship to the DPP framework.

[45] Products are not exempt. Article 4.5 covers microenterprises providing services. Microenterprises dealing with products covered by the EAA are not exempt. They benefit only from simplified obligations and Member State guidance. Textile products are not among the EAA's covered products, so this has no practical effect for the pilots.

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information, which is separately covered under the EAA's self-service terminal category. A static webpage or QR-code landing page used solely to display DPP data, without any transactional e-commerce function, would not automatically fall within scope on this basis alone, and should be assessed against the enumerated list rather than assumed to be covered.

Directive (EU) 2019/882 of the European Parliament and of the Council of 17 April 2019 on the accessibility requirements for products and services. ELI.	
Type of Act	Directive
Status	In force
Brief summary	Accessibility of consumer-facing digital services (applies to DPP consumer interfaces). The EAA doesn't apply to the DPP itself, but does apply to an economic operator's own e-commerce site or app (Article 2.2 (f)) if that channel serves as the gateway through which consumers access DPP data. A static webpage or QR-landing page used only to display DPP data, with no transactional function, wouldn't automatically fall within scope. Microenterprises providing services are exempt from the service accessibility requirements (Art. 4.5 EAA).
Impact on LIFE DPP-TEX	Low

Table 14. Legislation Overview.

Packaging and Packaging Waste Regulation (PPWR), Regulation (EU) 2025/40. The PPWR entered into force on 11 February 2025 and applies generally from 12 August 2026. Article 12 introduces harmonised physical labelling on material composition and disposal/sorting instructions, applicable from 12 August 2028, and permits that information to be conveyed through a data carrier — typically a QR code — as an alternative to full printed labelling; a separate reusability-labelling obligation applies from 12 February 2029 (Article 12.2), and the marking of substances of concern in packaging is left to a further Commission implementing act due by 1 January 2030 (Article 12.7). The PPWR does not create a DPP; for textiles the DPP derives from the ESPR (other Union acts, such as the Toy Safety Regulation, create their own).

The relevant provision is Recital 70 that addresses the scenario in which another Union legal act — such as a future ESPR delegated act — separately requires product information to be provided via a data carrier; in that circumstance, it expresses the coordinating principle that the packaging-related information required under the PPWR and the product information required under that other act should not be duplicated, so far as practicable; should be accessible via the same data carrier. It does not mandate that the DPP "must serve as the single digital gateway" for packaging data today, since no such ESPR delegated act extending DPP obligations to packaging yet exists. At present, therefore, the PPWR's data-carrier and labelling obligations and the ESPR's DPP obligations operate on separate legal tracks, with independent and materially different compliance deadlines.

For a textile SME, the practical implication is to prepare for eventual convergence without treating it as a present legal requirement: PPWR packaging-labelling obligations (from 12 August 2028) will apply to the SME's product packaging on their own statutory timeline, irrespective of whether or when a textile-specific ESPR delegated act is adopted. Building a single underlying data system capable of serving both the PPWR's labelling/data-carrier requirements and any future packaging-related DPP fields remains sound operational practice — consistent with the non-duplication principle in Recital 70 — but the SME's compliance planning should track the two regimes' deadlines independently rather than assume a unified gateway already exists in law.

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Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC. ELI.	
Type of Act	Regulation
Status	In force
Brief summary	The PPWR does not create a DP; for textiles, the DPP derives from the ESPR. Recital 70 sets a non-duplication principle for when packaging information and product information both use a data carrier. Today the two regimes run on separate legal tracks with independent deadlines.
Impact on LIFE DPP-TEX	Low

Table 15. Legislation Overview.

General Product Safety Regulation (GPSR), Regulation (EU) 2023/988. The GPSR has applied since 13 December 2024 and requires every product placed on the EU market — including online sales — to be linked to a responsible economic operator established in the Union, whose identifying and contact details must be available to consumers and market surveillance authorities. As with the other instruments addressed in this deliverable, the GPSR contains no provision requiring, or even referencing, the DPP, but Annex III (k) ESPR expressly refers to the operator responsible under Article 15 GPSR. The overlap lies in the underlying data: the responsible-person identification and contact details, and the safety instructions and warnings the GPSR requires, correspond closely to categories of information the DPP separately requires under Article 7.2 (b) and Annex III of the ESPR (manufacturer and responsible-operator contact details, user instructions and warnings). Where a textile product eventually falls within a sector-specific ESPR delegated act, an economic operator could, as a matter of operational efficiency, choose to make GPSR-mandated safety information accessible through the same physical data carrier used for the product's DPP — but no legal provision in either instrument obliges it to do so, and the GPSR's own reporting, recall and Safety Gate obligations remain independent of, and unaffected by, whatever DPP obligations eventually apply.

The DPP is not exclusively an ESPR construct. A parallel example — the recast Toy Safety Regulation, Regulation (EU) 2025/2509[46] — introduces its own, directly mandated DPP for toys under Articles 19 to 25, independent of any ESPR delegated act. This confirms that sector-specific product-safety legislation can create free-standing DPP obligations of its own; while not directly applicable to textiles today, it illustrates that the SME should not assume the DPP concept will remain confined to instruments deriving from the ESPR alone, and should monitor GPSR-adjacent sectoral legislation for similar developments.

Regulation (EU) 2023/988 of the European Parliament and of the Council of 10 May 2023 on general product safety, amending Regulation (EU) No 1025/2012 of the European Parliament and of the Council and Directive (EU) 2020/1828 of the European Parliament and the Council, and repealing Directive 2001/95/EC of the European Parliament and of the Council and Council Directive 87/357/EEC. ELI.	
Type of Act	Regulation
Status	In force
Brief summary	The GPSR contains no reference to the DPP, but its responsible-person and safety-warning requirements overlap with data the DPP separately requires under Article 7.2 (b) and Annex III ESPR — a functional, not legal, overlap.

[46] Regulation (EU) 2025/2509 of the European Parliament and of the Council of 26 November 2025 on the safety of toys and repealing Directive 2009/48/EC, OJ L, 2025/2509, 12.12.2025. ELI.

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Impact on LIFE DPP-TEX	Low

Table 16. Legislation Overview.

Market Surveillance and Compliance of Products Regulation (EU) 2019/1020. The Market Surveillance and Compliance of Products Regulation is in fact one of the few instruments in the present regulatory analysis with a genuine, express textual link to the DPP framework, rather than a merely functional overlap. Article 4 requires that, before a product falling within Union harmonisation legislation may be placed on the EU market, a responsible economic operator must be established within the Union; that same provision is directly cross-referenced within the ESPR itself, at Annex III(k), which requires the DPP to include the name, contact details and unique operator identifier of the economic operator responsible for the tasks under this Article 4 (or, alternatively, Article 15 of the GPSR). Article 6 further confirms that a product offered for sale online is deemed "made available on the market" wherever the offer is targeted at end users in the Union — determined case-by-case by reference to factors such as the languages used, the geographic delivery area, and the currencies accepted — which is the legal basis for treating online offers targeted at EU end users as placed on the market.

Article 10.3 ESPR requires the economic operator placing a product on the market to supply dealers and online marketplace providers with a digital copy of the relevant data carrier or unique product identifier — enabling the marketplace to display DPP information to prospective purchasers who cannot physically inspect the product before concluding a contract.

Taken together, Article 4 is expressly incorporated by reference into the DPP content provided for in Annex III (k), Article 6 supplies the jurisdictional trigger determining when a product offered online is treated as placed on the EU market, and Articles 9.2 (e) and 10.3 ESPR govern how DPP information must be made accessible to consumers at the pre-contractual, online-offer stage. Market surveillance authorities are, in turn, expressly named among the actors entitled to DPP access under Article 11 (b) ESPR, confirming the DPP's intended function as an enforcement tool under the Market Surveillance and Compliance of Products Regulation framework.

Regulation (EU) 2019/1020 of the European Parliament and of the Council of 20 June 2019 on market surveillance and compliance of products and amending Directive 2004/42/EC and Regulations (EC) No 765/2008 and (EU) No 305/2011. ELI.	
Type of Act	Regulation
Status	In force
Brief summary	Article 4 Market Surveillance and Compliance of Products Regulation (responsible EU operator) is directly cross-referenced in the DPP's own mandatory content under Annex III (k) ESPR, and Article 6 sets when an online offer counts as "placed on the market," triggering DPP obligations. Market surveillance authorities are also expressly named as DPP access-holders under Article 11 (b) ESPR.
Impact on LIFE DPP-TEX	Low

Table 17. Legislation Overview.

CE marking framework, Regulation (EC) 765/2008 and Decision 768/2008. The CE marking framework rests on two complementary instruments. Regulation (EC) No 765/2008 originally combined rules on accreditation of conformity assessment bodies with market surveillance provisions and the general principles governing the CE marking itself; however, its market surveillance chapter was subsequently

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repealed and replaced by the Market Surveillance Regulation, Regulation (EU) 2019/1020, with effect from 16 July 2021. Regulation (EC) 765/2008's continuing relevance today is accordingly confined to accreditation and the CE marking's general principles, with market surveillance now governed separately, as already addressed in the previous legislation overview. Decision No 768/2008/EC, by contrast, remains the operative common template underlying the New Legislative Framework (NLF) as a whole: it supplies the standard definitions of economic operators, the modular conformity assessment procedures (Modules A through H), and the baseline obligations placed on manufacturers, importers and notified bodies that recur across the EU's sectoral product legislation.

The link to the DPP runs mostly through this second instrument. The ESPR's own drafting architecture directly echoes Decision 768/2008's structure: Article 8 (h) ESPR requires every delegated act to specify the applicable conformity assessment module for its product group, drawing on the same modular system the Decision establishes, and Annex III (e) ESPR may require the DPP to carry the declaration of conformity, technical documentation and conformity certificates generated through that assessment process. The more precise characterisation, consistent with this report's treatment of the other adjacent instruments addressed throughout, is that the DPP does not create or digitise a new compliance regime of its own: it functions as a mandatory disclosure channel through which conformity documentation already produced under the pre-existing NLF architecture — the same architecture Decision 768/2008 has underpinned since 2008 — must be made accessible once the applicable ESPR delegated act brings a given textile product group within scope.

For this deliverable, the practical takeaway is that a textile SME's existing CE-marking compliance processes, where its products fall within CE-marked product categories, are not superseded by the forthcoming DPP obligation but will instead need to be integrated into it: the technical documentation, conformity certificates and notified-body outputs the SME already produces under the NLF are the source material the future textile DPP will be required to reference and disclose, making existing conformity-assessment recordkeeping a direct input into DPP readiness rather than a separate compliance track.

Regulation (EC) No 765/2008 of the European Parliament and of the Council of 9 July 2008 setting out the requirements for accreditation and repealing Regulation (EEC) No 339/93. ELI. and Decision No 768/2008/EC of the European Parliament and of the Council of 9 July 2008 on a common framework for the marketing of products, and repealing Council Decision 93/465/EEC. ELI.	
Type of Act	Regulation and Decision
Status	In force
Brief summary	Decision 768/2008's NLF template (conformity assessment modules) is directly echoed in ESPR Article 8 (h) (module selection) and Annex III (e) (declaration of conformity, technical documentation), with the DPP acting as the disclosure channel for that existing documentation rather than a new compliance system. Regulation 765/2008's own relevance is now limited to accreditation and CE marking principles, since its market surveillance provisions were repealed by the Market Surveillance and Compliance of Products Regulation.
Impact on LIFE DPP-TEX	Low

Table 18. Legislation Overview.

Forced Labour Regulation (FLR), Regulation (EU) 2024/3015. The FLR entered into force on 13 December 2024 and will apply from 14 December 2027, prohibiting the placing, making available, or exporting of products made with forced labour, regardless of the sector or country of origin. The FLR establishes its own, dedicated enforcement architecture: pursuant to Article 7.7 (a), the Commission adopted Implementing

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Regulation (EU) 2026/903, effective 17 May 2026, which creates a "forced labour module" within the pre-existing Information and Communication System for Market Surveillance ("ICSMS") — the same ICSMS established under Article 34 of Regulation (EU) 2019/1020 addressed earlier in this Section. That module, not the DPP, is the system through which competent authorities and customs coordinate investigations, share risk assessments, and issue decisions under the FLR.

As with the great majority of instruments addressed in this document, the FLR contains no direct reference to the ESPR or the DPP, and no legal provision integrates DPP data into the ICSMS forced labour module or vice versa. The relationship between the two regimes is accordingly functional rather than architectural: where a textile SME's products eventually fall within a textile-specific ESPR delegated act, the supply-chain traceability data the DPP would require it to hold — unique facility and operator identifiers, manufacturing location data — may, as a practical matter, assist the SME in demonstrating the absence of forced labour in its supply chain if a competent authority opens an investigation under the FLR, given the substantial evidentiary overlap between what a DPP records and what an FLR investigation would seek to establish. This is a matter of shared underlying evidence, however, not a legal requirement that the two systems interoperate, and the SME's FLR compliance obligations (principally the maintenance of adequate supply-chain due diligence documentation) apply and must be satisfied entirely independently of whether or when its products come within DPP scope.

Regulation (EU) 2024/3015 of the European Parliament and of the Council of 27 November 2024 on prohibiting products made with forced labour on the Union market and amending Directive (EU) 2019/1937. ELI.	
Type of Act	Regulation
Status	In force
Brief summary	Bans the import and marketing in the EU of products made with forced labor, including child labor. This affects all companies operating in the EU, regardless of their size. The FLR has its own dedicated enforcement system (an ICSMS forced-labour module) with no legal reference to the DPP, so the link is purely functional: supply-chain traceability data a DPP would hold (facility identifiers, manufacturing locations) could help an SME demonstrate absence of forced labour if investigated, but currently the two systems aren't required to interoperate.
Impact on LIFE DPP-TEX	Low

Table 19. Legislation Overview.

Textile Labelling Regulation (TLR), Regulation (EU) No 1007/2011. The TLR currently governs the physical labelling of textile fibre composition and remains, in its present form, silent on any digital or DPP-related obligation. However, the Regulation is undergoing an active revision process led by DG GROW[47], that remains at the pre-proposal stage at the moment. The ESPR's Working Plan expressly anticipates that the forthcoming textile-specific ESPR delegated act and the revised TLR will operate in synergy, with the TLR revision intended to integrate ESPR-derived information requirements (fibre composition, hazardous substances, care instructions) so that a single digital instrument — rather than two parallel physical and digital disclosure regimes — can ultimately satisfy both obligations.

[47] Comprising a stakeholder consultation (19 December 2023 – 15 April 2024) and a validation workshop (18 October 2024), feeding into a formal legislative proposal that has been repeatedly delayed — originally expected Q4 2023, then Q4 2025, and most recently reported as targeted for Q2 2026 — without confirmation. Currently it appears as “BLOCKED” in official sources consulted. Legislative Train Schedule (European Parliament) - Revision of the textile labelling regulation.

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For a textile SME, the practical implication is that today's physical fibre-content labelling obligation under the TLR remains fully in force and independent of any DPP obligation, but the TLR revision should be monitored closely, given the Commission's stated intent to converge the two disclosure regimes once the revision is adopted and the textile-specific ESPR delegated act enters into application.

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 and repealing Council Directive 73/44/EEC and Directives 96/73/EC and 2008/121/EC of the European Parliament and of the Council. ELI.	
Type of Act	Regulation
Status	In force
Brief summary	The proposal for the revision of the TLR remains delayed at the pre-proposal stage. It is expected to operate in synergy with the forthcoming ESPR delegated act for textiles once presented, converging fibre composition, hazardous substances and care-instruction disclosures into a single digital instrument. Today, the TLR's physical labelling obligation remains fully in force and independent of any DPP requirement.
Impact on LIFE DPP-TEX	Medium

Table 20. Legislation Overview.

Empowering Consumers for the Green Transition Directive (ECGT), Directive (EU) 2024/825. The ECGT was adopted on 28 February 2024, published in the Official Journal on 6 March 2024, required transposition by Member States by 27 March 2026, and has applied since 27 September 2026. The Directive amends Annex I of the Unfair Commercial Practices Directive (UCPD)[48] (the list of commercial practices deemed unfair in all circumstances) by inserting new points. These include point 2a, prohibiting a sustainability label not based on a certification scheme or established by public authorities; point 4a, prohibiting a generic environmental claim, such as "sustainable" or "eco-friendly", unless the trader can demonstrate "recognised excellent environmental performance", for example through the EU Ecolabel or an officially recognised EN ISO 14024 type I ecolabel; and point 4c, prohibiting claims that a product has a neutral, reduced or positive impact on the environment in terms of GHG emissions based on the offsetting of such emissions.

The ECGT contains no direct reference to the ESPR or the DPP, and does not legally require that substantiating documentation be hosted through a DPP. The relationship is, once again, functional rather than textually integrated, but here the functional overlap is unusually close and well-founded, for two independent reasons. First, the ECGT tightens the rules on environmental claims in ways that call for verifiable product data. It does not introduce a general obligation to substantiate all environmental claims; instead, alongside the specific prohibitions described above, claims about future environmental performance are considered misleading unless supported by a detailed and realistic implementation plan regularly verified by an independent third-party expert (Article 6.2 (d) UCPD), and other environmental claims remain subject to the general case-by-case assessment of misleading practices, which now expressly covers a product's environmental and social characteristics and circularity aspects (Article 6.1 (b) UCPD). The content that a textile delegated act may require in the DPP, such as carbon and environmental

[48] Directive 2005/29/EC of the European Parliament and of the Council of 11 May 2005 concerning unfair business-to-consumer commercial practices in the internal market and amending Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC and 2002/65/EC of the European Parliament and of the Council and Regulation (EC) No 2006/2004 of the European Parliament and of the Council (Unfair Commercial Practices Directive). ELI. UCPD means the Unfair Commercial Practices Directive—Directive 2005/29/EC. The ECGT, Directive (EU) 2024/825, amends the UCPD, including its Annex I "black list" of commercial practices that are prohibited in all circumstances.

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footprint data, substances-of-concern disclosures and recycled-content figures, is precisely the kind of verifiable evidence on which traders could rely to show that their environmental claims are not misleading under these rules, once the applicable delegated act applies. Second, the ECGT separately amends the Consumer Rights Directive (2011/83/EU) to impose new pre-contractual information duties concerning product durability, repairability, and the existence and duration of commercial guarantees. These obligations map directly onto the durability and repairability score fields identified in this report's earlier analysis of ESPR Article 7.2 (b) (i) and Annex I, where such scores are established under Union law.

For a textile SME, the practical conclusion is that the ECGT's restrictions on claims and its pre-contractual duties apply from 27 September 2026 in Member States that have transposed the Directive, including the Netherlands and Bulgaria; in Spain, where transposition is pending, traders remain subject to the existing rules on misleading practices, interpreted in the light of the Directive. Where the SME makes environmental or durability-related claims about its products, it must ensure today that those claims are not misleading and fall within none of the prohibited practices. In particular, generic claims require recognised excellent environmental performance, and claims about future performance require a verified implementation plan. The SME should therefore hold the verifiable evidence supporting each claim. Once a textile DPP obligation applies, that same evidence base should be structured so that it can populate both the fields required by the delegated act and the file the SME would rely on to defend its marketing claims under the ECGT. This avoids duplicating data-collection effort, rather than relying on any legal presumption that one instrument satisfies the other.

Directive (EU) 2024/825 of the European Parliament and of the Council of 28 February 2024 amending Directives 2005/29/EC and 2011/83/EU as regards empowering consumers for the green transition through better protection against unfair practices and through better information. ELI.	
Type of Act	Directive
Status	In force
Brief summary	The ECGT Directive aims to empower consumers with information tools and make informed and sustainable purchasing decisions. It requires environmental claims to be substantiated by verifiable evidence — precisely the class of data (carbon footprint, substances of concern, recycled content) the DPP is designed to generate under the ESPR. It also imposes pre-contractual durability and repairability disclosure duties that map directly onto the same DPP data fields, though the two instruments run on independent timelines with no formal cross-reference.
Impact on LIFE DPP-TEX	Medium

Table 21. Legislation Overview.

EU Ecolabel Regulation (EC) No 66/2010. The link between the EU Ecolabel Regulation and the DPP is, in fact, more directly grounded than most of the instruments addressed in this report. As already established in this report's earlier reconstruction of Annex III of the ESPR, the final paragraph of that Annex expressly requires delegated acts to specify what voluntary information manufacturers may include in the DPP, expressly naming whether the product has been awarded the EU Ecolabel as an example. Moreover, Article 41.4 ESPR establishes a presumption of conformity: *products covered by a delegated act adopted pursuant to Article 4 which have been awarded the EU Ecolabel pursuant to Regulation (EC) No 66/2010 shall be presumed to comply with the ecodesign requirements set out in that delegated act to the extent that those requirements are covered by the EU Ecolabel criteria established pursuant to Article 8 of that Regulation.*

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The EU Ecolabel criteria for textile products remain those established by Commission Decision 2014/350/EU, whose validity has been extended several times, most recently by Commission Decision (EU) 2026/66[49], so as to coordinate their ongoing revision with forthcoming legislative initiatives under the ESPR. Any future revision of the textile criteria should be monitored for alignment with the textile delegated act.

Regulation (EC) No 66/2010 of the European Parliament and of the Council of 25 November 2009 on the EU Ecolabel. ELI.	
Type of Act	Regulation
Status	In force
Brief summary	Provides the verified environmental criteria that populate the textile DPP. The DPP acts as the digital compliance tool to display these active, third-party audited credentials, streamlining market surveillance and preventing greenwashing. Article 41.4 ESPR establishes a presumption of conformity: *EU Ecolabel products shall be presumed to comply with the ecodesign requirements (to the extent that those requirements are covered by the EU Ecolabel criteria).*
Impact on LIFE DPP-TEX	Medium

Table 22. Legislation Overview.

Directive on the repair of goods ("right to repair"), Directive (EU) 2024/1799. The Right to Repair Directive entered into force on 30 July 2024 and must be transposed and applied by Member States from 31 July 2026. The Directive's repair obligation does not apply generally to all products; it is confined to the closed list of product categories set out in Annex II of the Directive, currently comprising ten categories: household washing machines and washer-dryers, household dishwashers, refrigerating appliances, electronic displays, welding equipment, vacuum cleaners, servers and data storage products, mobile phones, cordless phones and slate tablets, household tumble dryers, goods incorporating light means of transport batteries. Textile and apparel products are not among them. The Directive's own function is to create the enforceable repair obligation, the pricing transparency rules, and the consumer-facing information duties.

Because textiles fall outside Annex II, the Right to Repair Directive currently imposes no obligation whatsoever on a textile SME's core product range; there is, at present, no textile repair obligation for a textile DPP to support. However, the categories of technical data the Directive requires manufacturers of in-scope products to disclose (repair information, spare-parts availability and ordering channels, indicative repair pricing published via a free-access website) are substantively the same categories already identified in this report's earlier analysis of Article 7.2 (b) (i) and Annex I (b) of the ESPR (repairability score; characteristics, availability and pricing of spare parts). Should textiles later be added to Annex II — which has not occurred to date — or should the forthcoming textile-specific ESPR delegated act independently impose repairability information requirements, the same underlying data set would likely serve both purposes.

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. ELI.

[49] COMMISSION DECISION (EU) 2026/66 of 23 December 2025 amending Decisions 2014/350/EU, 2014/391/EU, (EU) 2016/1332, (EU) 2016/1349 and (EU) 2017/176 as regards the period of validity of the EU Ecolabel criteria and the related assessment and verification requirements for textile products, bed mattresses, furniture, footwear and wood-, cork- and bamboo-based floor coverings (notified under document C(2025) 9163).

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Type of Act	Directive
Status	In force
Brief summary	Textiles fall outside the Right to Repair Directive's closed product list (Annex II), so it currently imposes no obligation. The conceptual link is prospective: its disclosure categories (repairability, spare-parts data) match ESPR Article 7.2 (b) (i) and Annex I (b), so the same DPP data would serve both if textiles are ever added to scope.
Impact on LIFE DPP-TEX	Low

Table 23. Legislation Overview.

EU Deforestation Regulation (EUDR), Regulation (EU) 2023/1115. The EUDR, entered into force on 29 June 2023 and prohibits the placing on, or export from, the EU market of specified commodities and derived products unless they are deforestation-free, produced in accordance with the legislation of the country of production, and covered by a due diligence statement submitted under Article 4.2. Its scope, set out in Article 1 together with Annex I, covers seven commodities — cattle, cocoa, coffee, oil palm, rubber, soya and wood — together with their derived products (including leather, tyres, furniture, paper and chocolate). For a textile or footwear-adjacent SME, the relevant touchpoints are narrower than the full commodity list might suggest: leather (cattle-derived), rubber (footwear soles, elastics, coated fabrics), and, less obviously, wood-pulp-derived cellulosic fibres such as viscose, modal and lyocell. However, these fibres and the garments made from them (CN chapters 50 to 63) are not themselves listed in Annex I; only operators placing wood pulp itself on the market (e.g. CN chapter 47) are directly concerned. Cotton and other plant-based textile fibres fall entirely outside the EUDR's seven-commodity scope. The application of Regulation (EU) 2023/1115 has been deferred twice through amendments to Article 38. Under the current timetable, the Regulation applies from 30 December 2026 to operators and traders other than micro and small undertakings, and from 30 June 2027 to micro and small undertakings. The applicable undertaking category should be determined under the EUDR's definitions and the relevant Union rules on enterprise size.

The EUDR bears no direct legal relationship to the ESPR or the DPP: neither instrument references the other, and the EUDR's own compliance architecture — the due diligence statement, submitted through the dedicated EU Information System under Article 33, containing geolocation coordinates and production-date information for the relevant commodity — is entirely self-contained and operates independently of the DPP Registry established under Article 13 ESPR. No provision of either Regulation designates the DPP as the repository or transmission channel for EUDR due diligence data, and it would be inaccurate to characterise the two frameworks as sharing a mandatory or integrated compliance infrastructure.

The connection is, instead, a practical one of overlapping evidentiary needs. Where an SME's products incorporate leather, rubber or wood-pulp-derived fibres, the supplier-level traceability data the EUDR requires it to collect (geolocation, country of production, legality documentation) sits adjacent to the material-origin and composition data Annex III of the ESPR would separately require it to disclose through the DPP once the applicable textile delegated act applies. The two disclosures remain legally distinct and must each be made through their own designated channel, but an SME would be well advised to build a single internal supplier-data collection process capable of feeding both obligations, rather than treating them as unrelated data-gathering exercises.

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The European Union has adopted the Commission Delegated Regulation (EU) 2026/2102 of 13 July 2026 (OJ L, 17.9.2026) that amends Annex I to Regulation (EU) 2023/1115[50], which determines the EUDR's product-level scope by reference to specified product descriptions and Combined Nomenclature codes. The amendment removes specified leather-related entries from Annex I. Its effect is therefore product- and tariff-classification-specific: it should not be characterised as a wholesale removal of leather from the EUDR. Operators should confirm the applicable CN code against the amended Annex I before determining whether EUDR due-diligence obligations apply.[51]

Regulation (EU) 2023/1115 of the European Parliament and of the Council of 31 May 2023 on the making available on the Union market and the export from the Union of certain commodities and products associated with deforestation and forest degradation and repealing Regulation (EU) No 995/2010. ELI.	
Type of Act	Regulation
Status	In force
Brief summary	This regulation prohibits the importation and marketing of products associated with deforestation and forest degradation in the EU. It prohibits deforestation-linked products in the EU, mandating strict due diligence to prove the sustainable origin of materials. It introduces mandatory supply chain traceability and geolocation requirements for key raw materials. The EUDR bears no direct legal link to the ESPR or DPP — its due diligence system operates entirely separately from the DPP Registry. Scope adjustments apply to specific leather Combined Nomenclature (CN) codes following Commission Delegated Regulation (EU) 2026/2102. Operators must verify individual tariff classifications under Annex I.
Impact on LIFE DPP-TEX	Low

Table 24. Legislation Overview.

Critical Raw Materials Act (CRMA), Regulation (EU) 2024/1252. The CRMA, adopted on 11 April 2024 and in force since 23 May 2024, establishes a framework for securing the Union's supply of critical and strategic raw materials, identifying 34 critical and 17 strategic raw materials and setting 2030 capacity benchmarks of 10% of annual EU consumption from domestic extraction, 40% from domestic processing, and 25% from recycling, together with a diversification objective limiting reliance on any single third country to no more than 65% of annual consumption at any relevant stage of processing. It should be noted that these benchmarks are widely characterised as aspirational or non-binding targets directed at the Union and Member State level, rather than as direct compliance obligations imposed on individual economic operators.

The connection between the CRMA and the DPP framework operates through the ESPR's own treatment of critical raw materials as a product parameter. Annex I of Regulation (EU) 2024/1781 expressly identifies the use or content of recycled materials and the recovery of materials, including critical raw materials, as a product parameter in respect of which ecodesign requirements — and, correspondingly, DPP information requirements — may be set. Where a delegated act adopts such requirements for a given product group, the resulting DPP data on critical raw material content and recoverability would provide precisely the product-level traceability necessary to support recycling and material recovery at end-of-life, thereby serving as an enabling mechanism for the CRMA's 25% recycling benchmark. The relationship is thus

[50] Commission Delegated Regulation (EU) 2026/2102 of 13 July 2026 amending Regulation (EU) 2023/1115 of the European Parliament and of the Council as regards the list of relevant commodities and relevant products. ELI.
[51] DPP material-traceability data may remain commercially useful for leather-containing products, but it should not be represented as necessary to meet EUDR duties unless the particular product remains within the amended Annex I.

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functional and complementary: the CRMA sets the supply-side policy objective, while the DPP supplies the product-level information infrastructure through which secondary material streams can be identified and recovered.

For a textile SME, however, the CRMA's direct relevance is limited. Strategic and critical raw materials, as defined in Annexes I and II of the CRMA respectively, comprise principally metals and minerals associated with energy, digital, defence and aerospace applications, and are not ordinarily present in conventional textile and apparel products. The intersection would become material only in respect of products incorporating electronic components, metallic trims or fastenings, or smart-textile functionality containing listed materials — in which case the corresponding ESPR Annex I parameter, and any DPP disclosure requirement derived from it under the forthcoming textile delegated act, would come into play.

Regulation (EU) 2024/1252 of the European Parliament and of the Council of 11 April 2024 establishing a framework for ensuring a secure and sustainable supply of critical raw materials and amending Regulations (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1724 and (EU) 2019/1020. ELI.	
Type of Act	Regulation
Status	In force
Brief summary	Annex I ESPR treats critical raw material recovery as a product parameter, so DPP data on material content and recoverability supports the CRMA's 25% recycling benchmark — the CRMA sets the supply-side target, the DPP supplies the traceability data.
Impact on LIFE DPP-TEX	Low

Table 25. Legislation Overview.

EU Carbon Border Adjustment Mechanism (CBAM), Regulation (EU) 2023/956. The CBAM Regulation (as amended by Regulation (EU) 2025/2083) entered its definitive phase on 1 January 2026, at which point CBAM obligations became embedded in customs workflows, with authorisation requirements for declarants and, in due course, a financial adjustment effected through the surrender of CBAM certificates. The Regulation requires importers of in-scope goods to report the embedded emissions attributable to those goods, calculated in accordance with methodologies principally aligned to the EU Emissions Trading System rather than to general product carbon footprint standards such as the GHG Protocol or ISO 14067 — a methodological divergence of some significance for the present analysis.

The connection between CBAM and the DPP framework is one of overlapping subject matter rather than legal cross-reference: both instruments require the quantification and disclosure of embodied greenhouse gas emissions, and both do so at product level. Article 7.2 (b) (i) of the ESPR expressly contemplates carbon footprint as a performance parameter in respect of which information requirements may be set, and Annex I correspondingly identifies the carbon footprint of the product as a product parameter. Where an undertaking imports CBAM-covered goods and separately places products subject to DPP obligations on the market, the underlying emissions data may in principle serve both purposes — subject, importantly, to the caveat that the CBAM's ETS-aligned calculation methodology may not be directly transposable to the life-cycle-based footprint methodologies expected under the ESPR delegated acts, such that the two datasets should not be assumed to be interchangeable without methodological reconciliation.

For a textile SME, CBAM's practical relevance is accordingly narrow and indirect. Finished garments, fabrics and conventional clothing accessories fall outside Annex I entirely, and the SME's exposure arises only in the limited circumstance that it directly imports generic metallic hardware falling within the iron, steel or

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aluminium CN codes listed in Annex I[52] — and then only where the relevant *de minimis* threshold (50 tonnes of CBAM goods per importer per year) is exceeded. Where such imports occur, the resulting embedded-emissions data may prove a useful input to the carbon footprint field of a future textile DPP, but the SME should not treat CBAM compliance as discharging, or as being discharged by, its prospective DPP obligations under the ESPR.

Regulation (EU) 2023/956 of the European Parliament and of the Council of 10 May 2023 establishing a carbon border adjustment mechanism. ELI.	
Type of Act	Regulation
Status	In force
Brief summary	Both CBAM and the DPP require product-level embodied-emissions data, and ESPR Annex I/Article 7.2 (b)(i) both treat carbon footprint as a DPP data field — but CBAM's ETS-aligned methodology isn't directly interchangeable with the DPP's life-cycle footprint approach. Relevance for a textile SME is narrow: finished garments fall outside CBAM entirely, exposure arising only via imported metallic hardware (iron, steel, aluminium).
Impact on LIFE DPP-TEX	Low

Table 26. Legislation Overview.

Artificial Intelligence Act (AI Act), Regulation (EU) 2024/1689. The AI Act was formally adopted on 13 June 2024, published in the Official Journal on 12 July 2024 and entered into force on 1 August 2024. Its substantive obligations apply on a staggered timetable rather than all at once: the general provisions and the prohibited-practice rules have applied since 2 February 2025, the rules governing general-purpose AI models since 2 August 2025, and most remaining provisions, including the regime for "high-risk" AI systems listed in Annex III, were due to apply from 2 August 2026. This timetable has itself been extended by the "AI Omnibus" simplification package (Regulation (EU) 2026/1744, in force 27 July 2026), which pushed the Annex III high-risk deadline to 2 December 2027, and the deadline for high-risk AI systems embedded in regulated products (Annex I) to 2 August 2028 — a further instance of the same simplification agenda, arising from the Competitiveness Compass, that the present report has already traced through its effect on the CSRD and CSDDD.

As with the great majority of instruments addressed in this report, the AI Act contains no reference to the ESPR or the DPP, and the connection is accordingly functional rather than textual. Its relevance is conditional on how a DPP platform is actually built: where a system uses AI to extract, classify or verify DPP data (for instance, parsing supplier documentation for substance-of-concern information, or auto-classifying fibre composition), that AI functionality becomes subject to the AI Act's own risk-based framework in its own right, independently of any ESPR obligation. Critically, such a use case would not automatically qualify as "high-risk" under Annex III, since that Annex's list is confined to specific sensitive domains (biometric identification, critical infrastructure, education and employment access, essential public and private services, law enforcement, migration, and the administration of justice) that a data-extraction or classification tool of this kind would not ordinarily fall within — meaning the more probable applicable obligation is the lighter transparency duty under Article 50, requiring disclosure that content has

[52] CBAM's scope is determined exclusively by the CN codes listed in Annex I of Regulation (EU) 2023/956, which covers cement, electricity, fertilisers, iron and steel, aluminium and hydrogen. Chapter 96 (buttons, slide fasteners) and Chapter 83 (buckles, hooks, eyelets for clothing) are not listed in Annex I, and standard zippers, buttons and buckles are therefore outside CBAM scope even when imported separately. The exposure for fashion supply chains arises instead where generic industrial hardware is imported under Chapter 73 or 76 codes — industrial rivets and screws (CN 7318), chains (CN 7315), or generic metal plates and tags (CN 7326 / 7616) — which customs does not classify as clothing accessories.

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been AI-generated or that a person is interacting with an AI system, rather than the full risk-management, technical-documentation and human-oversight regime reserved for high-risk systems.

such a tool would usually not be high-risk; Article 50 transparency duties apply only if it interacts with persons or generates content.

Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024 laying down harmonised rules on artificial intelligence and amending Regulations (EC) No 300/2008, (EU) No 167/2013, (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1139 and (EU) 2019/2144 and Directives 2014/90/EU, (EU) 2016/797 and (EU) 2020/1828 (Artificial Intelligence Act). ELI.	
Type of Act	Regulation
Status	In force
Brief summary	Only applicable wherever a DPP system relies on AI to pull, sort, or validate data.
Impact on LIFE DPP-TEX	Low

Table 27. Legislation Overview.

2.1.3 National legislation and policy

A. SPAIN: National Legislation Relevant to the DPP

The following table identifies the principal EU measures relevant to the DPP and explains their legal operation in Spain. It distinguishes between directly applicable EU Regulations, which do not require transposition, and EU Directives, which require implementation through Spanish legislation.[53] It also highlights the Spanish measures of particular relevance to product information, chemical compliance, circular economy requirements, accessibility, data protection, market surveillance and consumer protection. The table should be read alongside the ESPR and any future product-specific delegated act, which will determine the concrete DPP obligations applicable to the relevant product category.

EU Instrument	Legal Form	Transposition Required?	Status (source)
ESPR (EU) 2024/1781	Regulation	No (no transposition required — Regulations are directly applicable in Spain without national implementing legislation)	Directly applicable; no transposition instrument exists or is required.[54] (DOUE-L-2024-80992)
REACH (EC) 1907/2006	Regulation	No	Directly applicable.

[53] Of the 23 instruments reviewed, only six are Directives genuinely requiring Spanish transposition (WFD/2025/1892, CSRD, CSDDD, EAA, ECGT, Right to Repair). Of those six, only one is confirmed fully transposed (EAA); the WFD's base text is separately transposed via Ley 7/2022, but its 2025/1892 textile-EPR amendment is not; and Spain is currently behind schedule, and formally under EU infringement scrutiny, on the ECGT specifically.

[54] The ESPR is directly applicable and requires no transposition, although its product requirements take effect only through delegated acts. Member States must nonetheless lay down effective, proportionate and dissuasive penalties for infringements, including at least fines and time-limited exclusion from public procurement, and notify them to the Commission (Article 74 ESPR). Enforcement relies on the market surveillance authorities already designated under Regulation (EU) 2019/1020, which must include a dedicated ESPR section in their national market surveillance strategies and report penalties imposed through the Union information and communication system (Articles 66 and 67 ESPR).

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CLP (EC) 1272/2008	Regulation	No	Directly applicable.
WFD, Directive 2008/98/EC (base text + 2018/851) WFD as amended by Directive (EU) 2025/1892 (textile EPR)	Directive	Yes — already transposed (base text) Yes — deadline 17 June 2027	**Ley 7/2022, de 8 de abril, de residuos y suelos contaminados para una economía circular.**[55] The new Spanish Waste Law (Ley 7/2022) requires that by 2025 at least 55% of household waste, including textiles, is prepared for reuse or recycling; target rises to 60% in 2030 and 65% in 2035. Not yet transposed; a draft Royal Decree on textile and footwear products (public consultation held 1 July–4 September 2025) has not yet been adopted.
CSRD, Directive (EU) 2022/2464	Directive	Yes — original deadline 6 July 2024	Not yet transposed (not enacted); Spain missed the original July 2024 deadline and transposition remains pending. In the interim, the pre-existing **Ley 11/2018, de 28 de diciembre, de información no financiera y diversidad** (the Spanish transposition of the earlier NFRD) continues to govern. **Proyecto de Ley de Información Empresarial sobre Sostenibilidad (LIES)**, approved by Consejo de Ministros 29 October 2024, remained pending as of the most recent information; Ley 11/2018 (NFRD transposition) continues to apply in the interim. In the meantime, **Real Decreto 214/2025,** de 18 de marzo («BOE» núm. 89, de 12 de abril de 2025), which entered into force on 12 June 2025, requires the companies already subject to non-financial reporting under the existing rules to calculate their carbon footprint and to draw up and publish GHG emissions reduction plans, starting with the 2025 footprint to be registered in 2026. The Decree itself states that it does not extend the group of companies obliged to calculate their carbon footprint or adopt a reduction plan beyond those already covered (BOE-A-2025-7439). It therefore operates as an interim, CSRD-adjacent

[55] Ley 7/2022, de 8 de abril, de residuos y suelos contaminados para una economía circular. BOE-A-2022-5809. ELI.

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			measure pending Spain's transposition of the CSRD, without extending obligations to companies, such as most textile SMEs, that fall outside the current reporting scope.
CSDDD, Directive (EU) 2024/1760	Directive	Yes — deadline now 26 July 2028 (as amended by Directive (EU) 2026/470)	Pending transposition. Transposition is not yet due, as the applicable deadline for Member States is set for July 2028, following the Omnibus I amendments. It will be integrated into Spanish national law alongside the upcoming framework on corporate sustainability reporting.
ESRS (Commission Delegated Regulation (EU) 2023/2772, as revised)	Delegated Regulation	No (directly applicable; content only becomes relevant once the underlying CSRD transposition is complete)	N/A directly; practical effect depends on Spain's still-pending CSRD transposition above.
DSA (EU) 2022/2065	Regulation	No	Directly applicable.[56]
Data Act (EU) 2023/2854	Regulation	No	Directly applicable; Spain must designate competent authorities under Article 37.
GDPR (EU) 2016/679	Regulation	No	Directly applicable; supplemented in Spain by **Ley Orgánica 3/2018 (LOPDGDD).**
EAA, Directive (EU) 2019/882	Directive	Yes — transposed	**Ley 11/2023, de 8 de mayo, de accesibilidad,** in force since 28 June 2025. Chapter II (Articles 3 to 6) sets the accessibility requirements applicable to the products and services within scope, cross-referenced to the technical requirements in Anexo I. Article 14 of that Law, within the chapter governing service providers' obligations, confirms that where a covered service (or part of it) is subcontracted to a third party, accessibility compliance must not be compromised and the primary service provider remains bound by the accessibility obligations — meaning that a textile SME which subcontracts the design or hosting of its e-commerce site or app to

[56] National legislation is nevertheless required for matters such as the designation and powers of competent authorities, procedural arrangements and enforcement. A previous Spanish measure assigning Digital Services Act supervisory functions to the Comisión Nacional de los Mercados y la Competencia was rendered ineffective following the repeal of Real Decreto-ley 9/2024 (Spain introduced an Article 9 bis into Ley 3/2013, de 4 de junio, de creación de la Comisión Nacional de los Mercados y la Competencia, through Real Decreto-ley 9/2024, de 23 de diciembre, assigning digital-services supervisory functions to the CNMC. However, that Royal Decree-Law was subsequently repealed by the Congress, through the Resolución de 22 de enero de 2025, del Congreso de los Diputados, published in the BOE. As a result, that Article 9 bis was left without effect).

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			an external developer remains legally responsible for that channel's accessibility compliance.
PPWR (EU) 2025/40	Regulation	No	Directly applicable.
GPSR (EU) 2023/988	Regulation	No	Directly applicable.
MSR (EU) 2019/1020	Regulation	No	Directly applicable.
CE marking — Reg (EC) 765/2008	Regulation	No	Directly applicable.
CE marking — Decision 768/2008	Decision	No — not directly transposed; operationalised through sectoral legislation	N/A.
Forced Labour Regulation (EU) 2024/3015	Regulation	No	Directly applicable.
TLR (EU) No 1007/2011	Regulation	No	Directly applicable.

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ECGT, Directive (EU) 2024/825 and **Right to Repair Directive (EU) 2024/1799**	Directive	Yes — deadline 27 March 2026, missed Yes — deadline 31 July 2026	Not yet transposed. **Anteproyecto de Ley de Consumo Sostenible** (approved in first round by the Consejo de Ministros around 1 July 2025, reforming the Ley de Competencia Desleal (LCD) and the Texto Refundido de la Ley General para la Defensa de los Consumidores y Usuarios (TRLGDCU)) remains pending and will transpose both directives in a single instrument. The European Commission opened an infringement procedure against Spain in May 2026 for failure to communicate transposition. In the absence of effective Spanish transposing provisions, Directive (EU) 2024/825 cannot, of itself, impose its new prohibitions on private traders. Traders nevertheless remain subject to applicable Spanish legislation governing misleading commercial practices and consumer protection, including Ley 3/1991 and Real Decreto Legislativo 1/2007. National courts must interpret that legislation, so far as possible, consistently with the Directive, without adopting a *contra legem* interpretation or relying on the Directive alone to impose or aggravate penalties. Failure by Spain to fulfil its transposition obligations may give rise to infringement proceedings.
EU Ecolabel Regulation (EC) 66/2010	Regulation	No	Directly applicable; **Real Decreto 234/2013, de 5 de abril**[57] is confirmed as the genuine domestic implementing instrument, designating the competent bodies (assigned to the Autonomous Communities) responsible for administering the Ecolabel in Spain — a competent-authority designation, not a transposition. **Art. 4 RD 234/2013**: public administrations must take the EU Ecolabel into account, particularly in public procurement.

[57] Real Decreto 234/2013, de 5 de abril, por el que se establecen normas para la aplicación del Reglamento (CE) nº. 66/2010 del Parlamento Europeo y del Consejo, de 25 de noviembre de 2009, relativo a la etiqueta ecológica de la Unión Europea. Referencia: BOE-A-2013-4290. Permalink ELI. Real Decreto 234/2013 not only designates the Autonomous Communities as responsible for awarding the EU Ecolabel; it also requires all public administrations, within their respective competences, to ensure that the EU Ecolabel is taken into account in environmental legislation and policies and, in particular, in public procurement procedures (Article 4). The Autonomous Communities must also promote the Ecolabel, especially among small and medium-sized enterprises, including through awareness activities aimed at contracting authorities (Article 3). This obligation is directly relevant to the Spanish pilot: public bodies purchasing workwear are required to take the EU Ecolabel into account in their tendering, which strengthens the case for workwear supported by verifiable Ecolabel-compliant data, such as the information a textile DPP is designed to carry.

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EUDR (EU) 2023/1115	Regulation	No	Directly applicable.
CRMA (EU) 2024/1252	Regulation	No	Directly applicable.
CBAM (EU) 2023/956	Regulation	No	Directly applicable.

Table 28. Spain: transposition and application of EU instruments.

Other Spanish national legislation of broader relevance to the DPP

In addition to the Spanish measures implementing relevant EU Directives, several horizontal Spanish laws may affect the way in which a DPP is designed, populated, made available and used in the market. These instruments do not create an independent Spanish DPP regime, which remains governed by Regulation (EU) 2024/1781 (ESPR) and the applicable product-specific delegated act. Their relevance is complementary: they regulate the truthfulness of commercial information, consumer protection, personal-data governance, security of public-sector information systems, product identification, circularity and packaging-related obligations.

Spanish instrument	Status	Broader relevance to the DPP	Principal caution
Real Decreto Legislativo 1/2007, de 16 de noviembre, approving the consolidated text of the General Law for the Defence of Consumers and Users	In force	Relevant where DPP information is made available to consumers or forms part of the product offer, pre-contractual information, conformity assessment, or a digital-marketplace environment. It supports requirements that consumer-facing product information be clear, relevant and consistent with the commercial offer.	It does not prescribe DPP content, data carriers, or technical architecture. Parts of its current text reflect EU transposition measures, so it should be treated as a general consumer-law framework rather than an autonomous Spanish DPP regime.
Ley 3/1991, de 10 de enero, de Competencia Desleal	In force	Particularly relevant to sustainability, durability, repairability, recycled-content, origin, composition and certification claims made through or by reference to a DPP. It provides a general control against misleading statements or omissions and deceptive use of trust marks, quality labels or similar	It regulates market conduct, not the technical or substantive DPP requirements. Its relevance turns on the manner in which DPP content is presented or used in commerce.

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		identifiers.	
Ley Orgánica 3/2018, de 5 de diciembre, de Protección de Datos Personales y garantía de los derechos digitales	In force	Relevant if DPP records, identifiers, repair histories, contact details, user accounts, or product-use data identify or make identifiable a natural person. It supplements the GDPR in Spain and informs data-minimisation, access-control and governance decisions.	Many DPP data points will concern products or economic operators rather than individuals. The legislation applies only where the information is personal data.
Real Decreto 311/2022, de 3 de mayo, por el que se regula el Esquema Nacional de Seguridad	In force	Relevant where a DPP infrastructure is operated by, connected to, procured by, or provides services to a Spanish public-sector body. Its security principles—confidentiality, integrity, authenticity, traceability, availability and preservation—are highly relevant to public DPP platforms, registers and authority access.	It is not a generally applicable cybersecurity regime for every private DPP solution. Its scope is centred on the public sector and specified related providers or services.
Real Decreto 1468/1988, de 2 de diciembre, por el que se aprueba el Reglamento de Etiquetado, Presentación y Publicidad de los Productos Industriales destinados a su venta directa a los consumidores y usuarios	In force, subject to subsequent sector-specific rules	Provides general background on truthful and sufficient product information, identification of the responsible operator, batch information, warnings and administrative inspection. These concepts are functionally relevant to product identification and traceability through a DPP.	It is an older, principally analogue labelling instrument. It cannot be treated as a legal basis for digital-passport requirements and may be displaced or supplemented by later sectoral legislation.
Ley 7/2021, de 20 de mayo, de cambio climático y transición energética	In force	Relevant as broader Spanish policy context for sustainability, circularity and climate-transition measures. It may support the policy rationale for credible product-environmental information and	It does not create a DPP obligation or establish DPP data fields. It is only a general policy context, not a compliance source for the passport.

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		lifecycle transparency.	
Ley 7/2022, de 8 de abril, de residuos y suelos contaminados para una economía circular	In force	Although it is principally connected to EU waste-law implementation, it remains relevant to the Spanish operational context for waste prevention, reuse, recovery, recycling and extended producer responsibility. A DPP may support traceability and end-of-life information connected with those objectives. Beyond the EPR provisions above, this is also the general Spanish framework establishing mandatory separate textile-waste collection from 1 January 2025 and general ecodesign/waste-prevention principles at national level; it is the natural anchor point for any future Spanish provisions operationalising DPP-derived data for waste-management purposes.	This is a transposition-linked instrument. A DPP does not replace waste, EPR or record-keeping obligations under the Law.
Real Decreto 1055/2022, de 27 de diciembre, de envases y residuos de envases	In force, subject to the directly applicable PPWR	Relevant where the DPP concerns packaged products. It forms part of the Spanish packaging and producer-responsibility landscape, including packaging information and waste-management obligations.	The PPWR now provides the directly applicable EU framework. The Royal Decree must be read only insofar as it remains compatible with the PPWR and must not be treated as a substitute for the Regulation.

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Ley 9/2017, de Contratos del Sector Público	In force	Provides the Spanish framework through which contracting authorities may incorporate environmental, circularity, traceability and product-information requirements into technical specifications, award criteria and conditions for contract performance. Its relevance to the DPP is therefore procedural and conditional.	Where a future implementing act under Article 65 ESPR establishes mandatory green public procurement requirements for an apparel product group, Spanish contracting authorities would be required to give effect to those procurement-specific requirements through the mechanisms provided by the LCSP. By contrast, a DPP obligation imposed as a product requirement under the ESPR applies independently to products placed on the EU market and is not dependent on its inclusion in a public tender. Pending adoption of the relevant textile-specific delegated act, the LCSP is an enabling framework for sustainability-related procurement requirements, rather than as an autonomous source of a mandatory textile DPP requirement.

Table 29. Spain: other national legislation of broader relevance to the DPP.

B. BULGARIA: National Legislation Relevant to the DPP

The following table sets out the corresponding EU measures and their legal operation in Bulgaria. As with Spain, it distinguishes directly applicable EU Regulations from Directives requiring national implementation, identifying the Bulgarian measures relevant to the DPP framework where applicable.[58]

[58] Of the six Directives requiring transposition, Bulgaria has completed three: the WFD base text, the CSRD (Accounting Act amendments, ДВ, бр. 72 от 27.08.2024 г., and Independent Financial Audit Act amendments, ДВ, бр. 79 от 17.09.2024 г.), and the ECGT (Act amending and supplementing the Consumer Protection Act, ДВ, бр. 87 от 24.09.2026 г.). The ECGT was transposed after the 27 March 2026 deadline but before the date its rules apply (27 September 2026). A fourth, the EAA, has been transposed but is procedurally defective: the Court of Justice found that Bulgaria failed to notify its transposition measures in time, despite substantive compliance (Case C-646/24, judgment of 19 March 2026). Like Spain, Bulgaria missed the Right to Repair deadline (31 July 2026), although its bill is further along in the legislative process (approved at first reading by the National Assembly in September 2026) than Spain's equivalent, which remains at the pre-parliamentary Anteproyecto stage. Transposition of the textile EPR amendments introduced by Directive (EU) 2025/1892 is not yet due (deadline 17 June 2027); the Waste Management Act has provided a statutory basis for textile EPR since 2021, while the implementing ordinance remains pending. The CSDDD transposition deadline (26 July 2028) has not yet passed. Bulgaria has thus been faster than Spain on both the CSRD (completed by September 2024, while Spain's transposition is still pending) and the ECGT (transposed in September 2026, while Spain's is still pending and subject to an infringement procedure).

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EU Instrument	Legal Form	Transposition Required?	Status (source)
ESPR (EU) 2024/1781	Regulation	No	Directly applicable.
REACH (EC) 1907/2006	Regulation	No	Directly applicable.
CLP (EC) 1272/2008	Regulation	No	Directly applicable.
WFD, Directive 2008/98/EC (base text) WFD, as amended by **Directive (EU) 2025/1892** (textile/footwear EPR)	Directive	Yes — already transposed Yes — Base text: already transposed. Directive (EU) 2025/1892 (textile and footwear EPR): deadline 17 June 2027.	**Waste Management Act (Закон за управление на отпадъците, ЗУО)**, ДВ, бр. 53 от 13.07.2012 г., as amended. The Act is Bulgaria's main instrument transposing the Waste Framework Directive; the Commission has nonetheless found shortcomings in the transposition of the minimum requirements for EPR schemes, the monitoring of waste prevention measures and the separate collection of textiles, which had to be in place by 1 January 2025.[59] **Textile and footwear EPR.** Bulgaria introduced a statutory basis for EPR for textile and footwear waste well before the harmonised EU regime. The amendments published in ДВ, бр. 19 от 5.03.2021 г. made persons placing footwear and textiles on the market subject to EPR and laid down rules for recovery organisations for footwear and textile waste, with effect from 1 June 2021. Persons placing second-hand textiles and footwear on the market are exempt (Article 14(15) ЗУО). The implementing ordinance needed to apply the regime in practice (a draft *Наредба за отпадъците от обувки и текстил*) has not yet been adopted. According to the Ministry of Environment and Water, a weight-based product fee for textiles and footwear is to be introduced, and the related amendment to the Waste Management Act has been submitted to the National Assembly. Transposition of Directive (EU) 2025/1892 remains pending, with a deadline of 17 June 2027;

[59] European Commission - Infringements decisions. November infringement package: key decisions. Brussels, 16 November 2023.

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			the national EPR scheme must be operational by 17 April 2028. **Separate collection of textile waste.** Although the Waste Framework Directive required separate collection of textiles from 1 January 2025 (Article 11 WFD), separate collection of textile waste in Bulgaria has not yet been introduced as a fully mandatory national system. According to the Ministry of Environment and Water, it is applied in practice in many municipalities through voluntary schemes and pilot projects, while the national association of municipalities reports that the practical conditions for fulfilling the obligation are still lacking. The Waste Management Act already regulates recovery organisations for footwear and textile waste (Article 84a, in force since 1 June 2021), but the implementing ordinance setting the detailed requirements has not yet been adopted. A government bill amending the Waste Management Act, submitted to the National Assembly on 13 November 2025, would introduce separate collection of textile and footwear waste through extended producer responsibility.
CSRD, Directive (EU) 2022/2464	Directive	Yes	**Transposed** — Act amending the Accounting Act (ДВ, бр. 72 от 27.08.2024 г., in force from 6 July 2024) and Act amending the Independent Financial Audit Act, renamed the Independent Financial Audit and Sustainability Assurance Act (ДВ, бр. 79 от 17.09.2024 г.).
CSDDD, Directive (EU) 2024/1760	Directive	Yes — deadline now 26 July 2028	Not yet due; no Bulgarian instrument identified.
ESRS (Delegated Regulation (EU) 2023/2772, as revised)	Delegated Regulation	No	N/A directly; practical effect follows from Bulgaria's already-completed CSRD transposition above.

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DSA (EU) 2022/2065	Regulation	No	Directly applicable
Data Act (EU) 2023/2854	Regulation	No	Directly applicable.
GDPR (EU) 2016/679	Regulation	No	Directly applicable; supplemented by the Personal Data Protection Act (ДВ, бр. 1/2002, as amended).
EAA, Directive (EU) 2019/882	Directive	Yes — **transposed**, but with a procedural defect (the Court of Justice ruled against Bulgaria in Commission v. Bulgaria (Case C-646/24, judgment of 19 March 2026) for failing to notify the Commission of its transposition measures on time, notwithstanding that the substantive national law was in fact adopted and entered into force on schedule).	**Закон за изискванията за достъпност на продукти и услуги** (Law on Accessibility Requirements for Products and Services), promulgated State Gazette № 31 of 11 April 2025, entered into force 28 June 2025. Market surveillance is carried out by the Commission for Consumer Protection (CCP / КЗП).
PPWR (EU) 2025/40	Regulation	No	Directly applicable; the national packaging ordinance remains applicable only insofar as it is compatible with the PPWR.
GPSR (EU) 2023/988	Regulation	No	Directly applicable.
MSR (EU) 2019/1020	Regulation	No	Directly applicable.
CE marking — Reg (EC) 765/2008	Regulation	No	Directly applicable.
CE marking — Decision 768/2008	Decision (reference template)	No	N/A.
Forced Labour Regulation (EU) 2024/3015	Regulation	No	Directly applicable.

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TLR (EU) No 1007/2011	Regulation	No	Directly applicable.
ECGT, Directive (EU) 2024/825	Directive	Yes — deadline 27 March 2026, missed	**Transposed.** Act amending and supplementing the Consumer Protection Act, **ДВ, бр. 87 от 24.09.2026 г.**; relevant provisions applicable from 27 September 2026.
EU Ecolabel Regulation (EC) 66/2010	Regulation	No	Directly applicable.
Right to Repair Directive (EU) 2024/1799	Directive	Yes — deadline 31 July 2026, missed	**In progress, not yet enacted.** The Council of Ministers submitted a bill amending the **Закон за предоставяне на цифрово съдържание и цифрови услуги и за продажба на стоки** (Law on the Supply of Digital Content and Digital Services and on the Sale of Goods) to the National Assembly, approved at first reading in September 2026; second reading pending.
EUDR (EU) 2023/1115	Regulation	No	Directly applicable.
CRMA (EU) 2024/1252	Regulation	No	Directly applicable.
CBAM (EU) 2023/956	Regulation	No	Directly applicable.

Table 30. Bulgaria: transposition and application of EU instruments.

Report-relevant observation: *the Bulgarian pilot concerns closed-loop recycling of home textiles. For that pilot, the most relevant part of Bulgarian law is the textile and footwear EPR regime introduced into the Waste Management Act in 2021 (ДВ, бр. 19/2021). It made persons placing footwear and textiles on the market subject to EPR and laid down rules for recovery organisations for footwear and textile waste, while exempting operators placing second-hand textiles and footwear on the market. Specialist compliance services report that a separate register for these producers is held by the Executive Environment Agency, but the ordinance setting the detailed obligations has not yet been adopted. The pilot partners should therefore confirm their registration and reporting position directly with the Executive Environment Agency before the harmonised EU regime becomes operational in 2028.*

Although the harmonised EU textile EPR schemes must be operational only by 17 April 2028, compliance planning for the Bulgarian home-textile pilot should already take account of the existing Bulgarian waste-reporting framework. Under the Waste Management Act (Закон за управление на отпадъците) and Ordinance No 1 of 4 June 2014, persons whose activities generate, collect, transport or treat waste must register in the National Waste Information System (NISO / НИСО), operated by the Executive Environment Agency, keep monthly record books and submit annual reports by 31 March. Those reports record, by

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waste type and code, the quantities handled, the operators from or to which waste was received or transferred, and the treatment operations applied. In the pilot, these obligations will apply to TexCycle's collection, sorting and recycling activities. They will apply to Kalinel only to the extent that it generates production waste or receives material that is still classified as waste. Kalinel would have no NISO reporting duty for recycled fibre that has ceased to be waste. Aligning the pilot's DPP data (such as origin, quantities and treatment steps) with the information already reported in NISO would avoid duplicate data collection, although no legal provision requires the DPP and NISO to be linked.

Other Bulgarian national legislation of broader relevance to the DPP

Several other Bulgarian statutory frameworks have broader, cross-cutting relevance to the Digital Product Passport (DPP) implementation:

- **Consumer Protection & Product Compliance Закон за защита на потребителите (Consumer Protection Act / CPA) –** Role in DPP: Regulates pre-sale consumer information requirements, green claims, and non-misleading marketing. Under the Empowering Consumers for the Green Transition Directive, consumer-facing DPP data accessible via QR codes in Bulgaria will be enforced under the CPA framework. The Consumer Protection Act now transposes the ECGT (ДВ, бр. 87/2026).
- **Закон за техническите изисквания към продуктите (Law on Technical Requirements for Products) –** Role in DPP: Governs conformity assessments, CE marking, and market surveillance protocols in Bulgaria. As Ecodesign for Sustainable Products Regulation (ESPR) requirements are rolled out, this act provides the baseline for national market surveillance authorities (such as the State Agency for Metrological and Technical Surveillance) to inspect whether physical products placed on the market carry valid DPP data carriers.
- **Digital Infrastructure & Cybersecurity Закон за киберсигурност (Cybersecurity Act) –** Bulgaria transposed Directive (EU) 2022/2555 (NIS2) through amendments to the Cybersecurity Act promulgated in the State Gazette, issue 17 of 13 February 2026. The amended Act applies to "essential" and "important" entities, identified automatically by sector and size, generally medium-sized and larger enterprises. Its risk-management and incident-reporting obligations may therefore apply to DPP service providers where they fall within its scope, for example as cloud computing, data-centre or managed ICT service providers. They may also apply to pilot partners operating in a covered sector, such as waste management, if they meet the size thresholds. Micro and small enterprises are, as a rule, outside its scope.
- **Закон за електронния документ и електронните удостоверителни услуги (Electronic Document and Electronic Trust Services Act) –** Role in DPP: Regulates digital signatures, time-stamping, and authentication within Bulgaria (implementing the EU eIDAS Regulation). Crucial for verifying the authenticity of supply chain attestations, laboratory test certificates, and compliance declarations attached to the textile DPP.
- **Commercial & Supply Chain Confidentiality Закон за защита на търговската тайна (Protection of Trade Secrets Act) –** Role in DPP: Transposes EU Directive 2016/943 into Bulgarian law. This framework is crucial for defining access rights within the DPP platform. It protects sensitive proprietary information (such as exact chemical formulations or specific supplier identities) by restricting access levels so that public consumers see high-level sustainability data while recyclers and authorities access full material compositions under protected access protocols.

C. THE NETHERLANDS: National Legislation Relevant to the DPP

The following table sets out the corresponding EU measures and their legal operation in the Netherlands. As with Spain and Bulgaria, it distinguishes directly applicable EU Regulations from Directives requiring

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national implementation, identifying the Dutch measures relevant to the DPP framework where applicable — including, notably, an existing national textile EPR scheme that predates the harmonised EU regime and will need to be reconciled with it.

EU Instrument	Legal Form	Transposition Required?	Status (source)
ESPR (EU) 2024/1781	Regulation	No	Directly applicable.
REACH (EC) 1907/2006	Regulation	No	Directly applicable.
CLP (EC) 1272/2008	Regulation	No	Directly applicable.

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WFD, Directive 2008/98/EC (base text) WFD, as amended by **Directive (EU) 2025/1892** (textile/footwear EPR)	Directive	Yes — already transposed. **Implementatiewet EG-kaderrichtlijn afvalstoffen (bill 32.392),** amended the Wet milieubeheer (Environmental Management Act), the Wet belastingen op milieugrondslag, and the Wet op de economische delicten. The Tweede Kamer adopted it unanimously on 30 November 2010, and the Eerste Kamer passed it as a hamerstuk on 1 February 2011. That Directive was subsequently amended by Directive (EU) 2018/851, transposed in turn through the Implementatiewet wijziging EU-kaderrichtlijn afvalstoffen, enacted as the Wet van 27 mei 2020 and published in the Staatsblad 2020, 158 — again amending the Wet milieubeheer, this time across Articles 1, 9, 10 and 15, principally to introduce the harmonised end-of-waste and by-product criteria and the minimum requirements for extended producer responsibility schemes. **Besluit uitgebreide producentenverantwoordelijkheid textiel ("Besluit UPV Textiel"),** based on Article 9.5.2 of the Wet milieubeheer (Environmental Management Act), already in force since 1 July 2023.	**Wet milieubeheer.** Dutch domestic waste law is centred on Chapter 10 (Hoofdstuk 10) of the Wet milieubeheer, which sets out the general obligations for household, hazardous and commercial waste, including municipalities' collection duty, with further technical detail delegated to general administrative orders (algemene maatregelen van bestuur), provincial environmental ordinances and municipal waste ordinances. Chapter 10 transposes the Waste Framework Directive's base text, as amended by the Implementatiewet EG-kaderrichtlijn afvalstoffen (Stb. 2011, 103) and the Act of 27 May 2020 (Stb. 2020, 158). **General EPR framework.** Within this structure, the *Besluit regeling voor uitgebreide producentenverantwoordelijkheid* (Stb. 2020, 375) implements Article 8a WFD and sets the minimum requirements applying to all Dutch EPR schemes, including the allocation of roles, cost coverage and information obligations. **Textile EPR.** The *Besluit uitgebreide producentenverantwoordelijkheid textiel* (Stb. 2023, 132), adopted under the same statutory chapter, applies this framework to textiles and refers expressly to the general decree in its Article 2. The base WFD transposition and the textile-specific EPR scheme therefore sit within a single, continuous domestic legal architecture. In force since 1 July 2023, the textile decree covers consumer clothing, workwear and household linen (CN chapters 61 and 62 and heading 6302), but not footwear, bags, blankets or curtains. Producers must register with Rijkswaterstaat and meet binding targets for preparation for re-use and recycling, starting at 50% of the weight placed on the market in the previous year from 2025 and rising towards 2030. **Alignment with Directive (EU) 2025/1892.** The Netherlands thus

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CSRD, Directive (EU) 2022/2464	Directive	Yes — Member States must transpose the CSRD amendments by 19 March 2027 deadline. No dedicated Dutch transposition act yet in force.	**Not yet transposed** — draft implementing legislation remains pending and is being revised to incorporate the Omnibus I changes (Directive (EU) 2026/470, in force 18 March 2026; general transposition deadline 19 March 2027, with the CSDDD-specific amendments under Article 4 deferred to 26 July 2028).
CSDDD, Directive (EU) 2024/1760	Directive	Yes — deadline 26 July 2028 (Omnibus I CSDDD amendments).	**Not yet enacted.** The Wetsvoorstel internationaal verantwoord ondernemen remains pending and is officially described as not on schedule.
ESRS (Delegated Regulation (EU) 2023/2772, as revised)	Delegated Regulation	No	N/A, directly applicable.
DSA (EU) 2022/2065	Regulation	No	Directly applicable.
Data Act (EU) 2023/2854	Regulation	No	Directly applicable.
GDPR (EU) 2016/679	Regulation	No	Directly applicable.
EAA, Directive (EU) 2019/882	Directive	Yes — already transposed. **Implementatiewet toegankelijkheidsvoorschriften producten en diensten**, Stb. 2024, 87 (Kamerstukken 36 380; BWBR0049571); entered into force on 28 June 2025 (Stb. 2024, 341), enacted 2024, substantive obligations applicable from 28 June 2025; regulator: Autoriteit Consument & Markt (ACM).	**Transposed and in force,** and independently described as one of the better-prepared EAA transpositions in the EU, building on the Netherlands' existing public-sector digital accessibility framework (Tijdelijk Besluit Digitale Toegankelijkheid Overheid, later made permanent via the Wet Digitale Overheid).
PPWR (EU) 2025/40	Regulation	No	Directly applicable.
GPSR (EU) 2023/988	Regulation	No	Directly applicable.
MSR (EU)	Regulation	No	Directly applicable.

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2019/1020			
CE marking — Reg (EC) 765/2008	Regulation	No	Directly applicable.
CE marking — Decision 768/2008	Decision (reference template)	No	N/A.
Forced Labour Regulation (EU) 2024/3015	Regulation	No	Directly applicable.
TLR (EU) No 1007/2011	Regulation	No	Directly applicable.
ECGT, Directive (EU) 2024/825 (EmpCo)	Directive	Yes — already transposed **Implementatiewet richtlijn betere duurzaamheidsinformatie voor consumenten (bill 36.873),** amending Book 6 of the Burgerlijk Wetboek (Dutch Civil Code).	Considerably further advanced than Spain's equivalent process: the Eerste Kamer's own procedural record shows a vote scheduled as a hamerstuk (a non-contentious bill passed without debate) on 26 May 2026. While the ECGT defines what you can legally *say* to consumers, the **PEFCR** acts as the scientific rulebook that dictates how you *measure* those impacts. **Transposed.** Implementatiewet richtlijn betere duurzaamheidsinformatie voor consumenten, Wet van 27 mei 2026, Stb. 2026, 152 (Kamerstukken 36 873); applies from 27 September 2026.
EU Ecolabel Regulation (EC) 66/2010	Regulation	No	Directly applicable.
Right to Repair Directive (EU) 2024/1799	Directive	Yes — deadline 31 July 2026, missed	**Not yet transposed.** The bill implementing Directive (EU) 2024/1799 (Wetgevingskalender WGK028011) was submitted to the Tweede Kamer on 10 July 2026, with parliamentary treatment expected only after the summer recess. The Netherlands therefore missed the transposition deadline of 31 July 2026. The bill had, however, entered formal parliamentary scrutiny before the deadline passed, unlike Spain's equivalent, which remains at the pre-parliamentary Anteproyecto stage.

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EUDR (EU) 2023/1115	Regulation	No	Directly applicable.
CRMA (EU) 2024/1252	Regulation	No	Directly applicable.
CBAM (EU) 2023/956	Regulation	No	Directly applicable.

Table 31. The Netherlands: transposition and application of EU instruments.

Report-relevant observation: *The Netherlands is the clearest example in this report's three-country comparison of a Member State that acted proactively ahead of EU harmonisation on textile EPR specifically, while remaining, like Spain, behind schedule on CSRD. Given that bAwear BV, operates within this jurisdiction, this report should treat the interaction between the pre-existing Besluit UPV Textiel and the incoming EU-harmonised regime as a specific item warranting direct verification with that partner, since the practical compliance path for a Dutch-based textile operator may differ materially from the "build from scratch" position facing operators in Spain and Bulgaria.*

Other Dutch national legislation and policy of broader relevance to the DPP

- **Aanbestedingswet 2012** (Public Procurement Act 2012), in force since 1 April 2013, implementing the EU procurement directives (2014/24/EU, 2014/25/EU, 2014/23/EU) and detailed further via the Aanbestedingsbesluit. Repeatedly amended between 2022 and 2024 to strengthen "Maatschappelijk Verantwoord Inkopen" (Socially Responsible Procurement, MVI) provisions — the natural domestic vehicle for any future mandatory EU Green Public Procurement criteria for textiles.
- **Klimaatwet** (Climate Act) — sets legally binding domestic GHG targets (climate neutrality by 2050; 55% reduction by 2030 against 1990 levels, sharpened in 2023), operationalised through a rolling ten-year Klimaatplan. This is the domestic counterpart to the European Climate Law, Regulation (EU) 2021/1119.
- **Uitvoeringswet Algemene verordening gegevensbescherming (UAVG)** — the Dutch GDPR-supplementing act, adopted by the Tweede Kamer on 13 March 2018 and passed by the Eerste Kamer as a hamerstuk on 15 May 2018, entering into force on 25 May 2018 alongside the GDPR itself, and repealing the prior Wet bescherming persoonsgegevens. It designates the Autoriteit Persoonsgegevens (AP) as the Dutch supervisory authority, with power to impose administrative fines, and exercises several of the GDPR's national-discretion provisions (Articles 22–30 UAVG) largely preserving prior Wbp exceptions. This is the direct Dutch counterpart to Spain's Ley Orgánica 3/2018 and Bulgaria's Закон за защита на личните данни, both already identified in this report — relevant given the earlier analysis of personal data potentially appearing within DPP-hosted repair-history or contact-detail fields.
    - **Verzamelwet gegevensbescherming** (Data Protection Collection Act, Stb. 2026, 154), entered into force on 1 September 2026 (with one exception), modernising and streamlining the UAVG — including new provisions on personal-data processing in the context of transaction monitoring and automated decision-making.
- **Circular Textiles Policy Programme (2nd edition).** Overarching ambition: fully circular Dutch textile chain by 2050; frames the EPR targets as intermediate milestones. Rolling 2025–2030; further regulatory detail expected.
- **ACM Leidraad Duurzaamheidsclaims ("Guidelines on Sustainability Claims")** is guidance, not legislation. It is issued by the Autoriteit Consument & Markt (ACM), the Dutch consumer and competition authority, which enforces the rules on misleading sustainability claims in the Netherlands. The guidelines explain how the ACM interprets the existing legal rules and how it will

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enforce them. Legally, they are not binding, but they are a strong indication of how the regulator will act. It is a useful national reference for WP6 and WP7, particularly for claims about recycled content, circularity or environmental benefits. Following the transposition of the Empowering Consumers Directive by the Implementatiewet richtlijn betere duurzaamheidsinformatie voor consumenten (Stb. 2026, 152), which has applied since 27 September 2026, the ACM is updating the guidance in coordination with other European consumer authorities; the guidance remains non-binding, and the binding rules are those of the implementing act.

2.2 Forthcoming legislation

This section examines legislation not yet adopted or not yet applicable that will shape the textile DPP: first the textile delegated act under the ESPR (2.2.1), then other anticipated legislation (2.2.2).

2.2.1 ESPR delegated act on textiles

Following **Article 4 ESPR**, the Commission *is empowered to adopt delegated acts in accordance with Article 72 to supplement this Regulation by setting ecodesign requirements. Those delegated acts shall include at least the elements listed in Article 8. Such ecodesign requirements shall be set in accordance with Articles 5, 6 and 7 and Chapter III*. To that end, ESPR is a framework. Concrete obligations, data points, carrier, deadlines, etc. will be set per product group through delegated acts adopted by the Commission. In adopting delegated acts, the Commission must allow economic operators sufficient time to comply with the ecodesign requirements they set out, with particular regard to the needs of SMEs, and micro-enterprises especially. The date of application of a delegated act shall not be earlier than 18 months from its entry into force.

Article 8 ESPR sets out the **minimum elements or content** that the delegated acts adopted pursuant to Article 4 shall specify:

(a) the definition of the product group or groups covered, including the list of commodity codes as set out in Annex I to Council Regulation (EEC) No 2658/87 (3) and product descriptions;
(b) the ecodesign requirements for the product groups covered;
(c) where relevant, the product parameters referred to in Annex I for which the Commission states that no ecodesign requirements are necessary, pursuant to Article 4;
(d) the test, measurement or calculation standards or methods to be used pursuant to Article 39(1);
(e) where relevant, requirements for the use of digital tools pursuant to Article 39(2);
(f) where relevant, the transitional methods, the harmonised standards or parts thereof the references of which have been published in the Official Journal of the European Union, or the common specifications to be used;
(g) the format, manner and order in which the information necessary for the verification of compliance is to be made available;
(h) the conformity assessment module to be used pursuant to Article 4(5); where the module to be applied is different from the module set out in Annex IV, the factors leading to the choice of that module;
(i) the requirements concerning information to be provided by manufacturers, including on the elements of the technical documentation that are necessary to enable the verification of compliance of the product with the ecodesign requirements;
(j) where relevant, any additional information requirements under Articles 36 and 37;
(k) the duration of the transitional period during which Member States are to permit the placing on the market or putting into service of products which comply with the national measures in force in their territory on the date of entry into force of the delegated act adopted pursuant to Article 4;

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(l) *the date for the review of the delegated act adopted pursuant to Article 4, taking into consideration, among other aspects:*
  (i) *the characteristics of the product group and its market;*
  (ii) *the need to adapt the requirements to make products more sustainable;*
  (iii) *Union policy objectives;*
  (iv) *technical progress; and*
  (v) *availability of methods.*

Where warranted by the particular characteristics of the product group, the delegated acts may also include any of the following additional requirements (Article 4.6):

(a) *where necessary for effective market surveillance:*
  (i) *(i) that manufacturers, their authorised representatives or importers keep the technical documentation and the EU declaration of conformity for a period other than the 10 years referred to in Article 27(3), Article 28(2), point (a), or Article 29(7), as applicable, after the relevant product has been placed on the market or put into service taking into account the nature of the product or ecodesign requirements concerned;*
  (ii) *(ii) that economic operators provide, upon request, market surveillance authorities with the information set out in Article 36(2), second subparagraph, for a period other than 10 years referred to therein after the relevant product has been supplied;*
  (iii) *that manufacturers, their authorised representatives or importers make parts of the technical documentation related to the relevant product digitally available to the Commission or market surveillance authorities without a request being necessary, in accordance with Article 36(3);*
  (iv) *that supply chain actors comply with the obligations listed in Article 38.*
(b) *that manufacturers, their authorised representatives or importers make available to the Commission information on the quantities of a product covered by the delegated acts referred to in paragraph 1 of this Article placed on the market or put into service, in accordance with Article 37(1);*
(c) *where necessary in order to ensure energy-efficient usage of products or to develop future ecodesign requirements:*
  (i) *that products be able to measure the energy they consume or their performance in relation to other relevant product parameters referred to in Annex I while in use, in accordance with Article 37(2);*
  (ii) *that manufacturers, their authorised representatives or importers collect non-personal in-use data referred to in point (i) and report to the Commission in accordance with Article 37(4);*
  (iii) *that digital tools be used to calculate the performance of a product in relation to a product parameter referred to in Annex I, in accordance with Article 39(2);*
(d) *in order to ensure transparency about conformity with ecodesign requirements, rules on markings indicating conformity with ecodesign requirements, for products not subject to the requirement to affix the CE marking before being placed on the market or put into service, in accordance with Article 47.*

The ESPR delegated acts for textiles, containing sector-specific DPP requirements, are expected to be adopted in 2027. Given the 18th month minimum mandate regarding the date of application of a delegated act from its entry into force (pursuant Article 4), the DPP for textiles is not expected to be applicable until 2028-2029 timeframe. The JRC's preparatory work on textile product requirements is progressing towards a future ESPR delegated act. The study is expected to inform the technical evidence base for possible ecodesign requirements and associated DPP information requirements. The ongoing textile preparatory

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study is now at its 3rd (of 4) milestone[60], with the JRC providing technical and scientific support, binding product requirements and DPP fields will be established only through the Commission's eventual ESPR delegated act. The ESPR sets out a horizontal framework for digital product information requirements, but the precise scope of DPP obligations for the textiles sector will ultimately hinge on how the Commission defines product groups in the delegated acts still to come.

The Regulation (EU) 2024/1781 –Ecodesign for Sustainable Products Regulation (ESPR)– establishes a new horizontal framework for improving the environmental sustainability and circularity of products placed on the EU market. It sets out the DPP as a mandatory requirement for selected product groups, explicitly identifying textiles, in particular garments and footwear, among the product groups to be prioritised in the first Working Plan (Article 18 ESPR). These requirements cover, *inter alia*, durability, repairability, recyclability, recycled content, presence of substances of concern and environmental impacts.

To that end, the ESPR establishes the DPP as a tool that becomes mandatory for each product group once required by a delegated act, ensuring transparency, traceability, and circularity throughout product value chains. As such, DPPs are set to become central to compliance efforts, enabling the safer, regulatory-aligned management of diverse textile flows. This regulatory framework is evolving rapidly: by the end of the decade, textile apparel placed on the EU market is expected to carry a DPP containing standardised, machine-readable information on its composition, recyclability, and environmental performance; whether other textile products will follow depends on future delegated acts.

Until the textile delegated act applies, no EU method for product-level impact data in the DPP is binding. The delegated act will set both the information requirements and the calculation methods, and may draw on the PEF method and the Apparel and Footwear Product Environmental Footprint Category Rules (PEFCR), although this is not yet confirmed.[61] In the meantime, any footprint figure shared with consumers, in a voluntary DPP or elsewhere, is voluntary information and is governed by the rules on environmental claims introduced by Directive (EU) 2024/825, as transposed in each Member State. Whether all textile products will eventually carry a DPP, and which environmental indicators it will contain, depends on how the delegated act defines the product groups and information requirements.

Anticipated content of the textile delegated act: evidence from JRC preparatory work

The JRC is preparing the technical evidence base for the future delegated act on textile apparel under the ESPR. Its ***Study on DPP content for textile apparel products under ESPR***[62], published in May 2026, is part

[60] The Joint Research Centre's preparatory study on textile products has progressed through the third of its four planned milestones: the 3rd Milestone Technical Report was published on the JRC's Product Bureau site on 12 December 2025 and presented to stakeholders at a workshop on 14–15 January 2026. As part of the same preparatory work, the JRC published in May 2026 a study proposing DPP content for textile apparel, organised in four categories (product identification and classification; producer information; product characteristics; compliance documentation), with batch identifiers as the minimum requirement and each data point assigned to model or batch level (JRC, 2026a, s. 7 and 9.1). A fourth and final milestone is expected before the end of 2026. Together with the evidence gathered in the earlier milestones, it will inform the Commission's preparation of the textile delegated act, subject to stakeholder consultation and an impact assessment. Footwear falls outside the scope of this study and is subject to a separate Commission assessment expected by the end of 2027.

[61] The PEFCR for Apparel and Footwear sits under the EU Product Environmental Footprint (PEF) method, which was adopted through Commission Recommendation (EU) 2021/2279 (PEFCR for Apparel and Footwear, version 3.1 (final text dated 29 April 2025; valid until 31 December 2027), approved by the European Commission in 2025 as a non-binding methodology). Under the EU Treaties, a Recommendation is a non-binding act. That Recommendation states only that Member States should use the PEF method in voluntary policies. The PEFCR is an "approved methodology" or "category rules", a sector-specific set of calculation rules, drafted by a multi-stakeholder Technical Secretariat, put through public consultations and expert review, and then given the go-ahead by the European Commission. It could become binding only if legislation refers to it. The ESPR refers to the PEF method established by Commission Recommendation (EU) 2021/2279 as a basis for quantifying a product's environmental footprint, alongside other recognised scientific methods (Article 2 (24) ESPR), and directs the Commission to take it into account when developing methods for setting ecodesign requirements (Recital 23 ESPR). Whether, and how, the PEF method and the PEFCR for Apparel and Footwear will be required for textiles will be determined by the textile delegated act.

[62] JRC (2026a): González-Torres, M., and A. Arcipowska, *Study on DPP Content for Textile Apparel Products under ESPR: JRC Recommendations to Support DPP Requirements in the Framework of the ESPR Regulation*, external study report prepared for the European

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of that preparatory work. It proposes a structured set of DPP content requirements, drawing on the ESPR framework, existing EU disclosure obligations, current industry practice and a use-case methodology (JRC, 2026a, s. 1). That methodology is set out separately in JRC145830 (JRC, 2026b)[63]. The study states that its findings must still be validated through broad stakeholder consultation and refined during the impact assessment for the delegated act. As an external study report, it does not necessarily reflect the Commission's position (JRC, 2026a, s. 1 and legal notice). Everything in this subsection is therefore anticipatory. It indicates the likely direction of the delegated act, not its final content.

Anticipated scope. The JRC proposes to limit the DPP obligation to **textile apparel**:

- **Definition and rationale.** A textile product would be one containing at least 80% textile fibres by weight, in line with the Textile Labelling Regulation. Apparel was selected because it holds the largest share of the EU market and accounts for the largest share of environmental impacts (JRC, 2026a, s. 4.1).
- **Categories covered.** Ten categories: T-shirts; shirts and blouses; sweaters and mid-layers; jackets and coats; trousers and shorts; dresses, skirts and jumpsuits; leggings, tights and socks; underwear; swimwear; and textile apparel accessories (JRC, 2026a, s. 4.1, Table 2).
- **Technical apparel.** Workwear and sportswear are expressly included, unless they fall within an exclusion (JRC, 2026a, s. 4.1).
- **Exclusions.** Smart and electronic textiles; apparel qualifying as personal protective equipment under Regulation (EU) 2016/425; medical devices under Regulation (EU) 2017/745; and toys under Directive 2009/48/EC (JRC, 2026a, s. 4.2).
- **Left open.** Customised and upcycled apparel are to be addressed in the impact assessment (JRC, 2026a, s. 4.2).
- **Final products only.** Intermediate products such as fabrics, yarns and fibres are excluded. The study notes that the apparel delegated act therefore could not serve as an upstream traceability tool. Separate DPPs for intermediate products may follow under future acts or be developed voluntarily by industry (JRC, 2026a, s. 4.3).
- **Data carriers.** Products using UHF RFID or NFC carriers would not count as e-textiles and would therefore stay in scope (JRC, 2026a, s. 4.3).

Anticipated structure of the DPP content. The study organises the potential content of the textile DPP around the information categories provided for in the ESPR:

- product and producer identification, built on three identifiers: the unique product identifier, unique operator identifier and unique facility identifier;
- product and producer information;
- product-specific information under Article 7.2 (b) ESPR;
- information on substances of concern under Article 7.5 ESPR;
- compliance documentation, meaning the EU declaration of conformity, technical documentation and certificates;
- information already required under other Union law, under Annex III (a), (e) and (f) ESPR (JRC, 2026a, s. 2.1.2).

The full set of ESPR provisions from which a delegated act may select its requirements is mapped in the traceability matrices of JRC145830, Annex 2, Tables 23 to 26. These cover content requirements, non-functional requirements, DPP system information and data carriers (JRC, 2026b, Annex 2). The JRC

Commission, Joint Research Centre, 13 May 2026 (JRC number, ISBN and DOI not yet assigned). https://susproc.jrc.ec.europa.eu/product-bureau/sites/default/files/2026-05/Textiles_DPP_20260513.pdf

[63] JRC (2026b): Chawla, K., T. Chirvasuta, M.-A. Wolf, K. Wolf, S. Rongen, R. Rurup, M. Gonzalez Torres, G. Naumann, and A. Arcipowska, *Methodology for Defining Data Requirements for the Digital Product Passport under the ESPR Framework*, EUR 40660, Publications Office of the European Union, Luxembourg, 2026, https://data.europa.eu/doi/10.2760/4511279, JRC145830

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methodology sorts candidate data into three tiers: essential, strongly recommended and voluntary (JRC, 2026b).

Data points drawn from other legislation. The study identifies the following existing disclosures as relevant to the textile DPP (JRC, 2026a, s. 5.1, Table 3):

Source	Disclosure	Status in the study
Textile Labelling Regulation	Fibre composition (Art. 9); the statement "contains non-textile parts of animal origin" (Art. 12)	Mandatory today
Textile Labelling Regulation (revision)	Composition of non-textile parts; care instructions; origin (place of making-up); size	Under consideration. Basic information would stay on the physical label, with supplementary information on a digital label hosted on the DPP
REACH	Presence of substances of very high concern above 0.1% w/w (Art. 33)	Mandatory. The study notes that the ESPR substances-of-concern regime is considerably broader
Consumer Rights Directive, as amended by Directive (EU) 2024/825	Legal guarantee notice; commercial durability guarantee label; conditions of after-sales services	Mandatory
EU Ecolabel	Award of the label	Voluntary

Table 32. Data points drawn from other legislation. Source: JRC, 2026a, s. 5.1, Table 3.

The study regards the CSRD and CSDDD disclosures as of limited relevance to the DPP, because they operate at company level rather than product level (JRC, 2026a, s. 5.1). This matches the functional, rather than textual, link between those instruments and the DPP already identified in Section 2.1.2.

Industry readiness and granularity. The study's stakeholder interviews show readiness varying by type of data:

- **High readiness:** product identification, producer information, transaction data and fibre composition. These are already widely held, usually at model or order level, and GS1 identifiers (GTIN and GLN) are the most commonly used references, although less mature brands tend to rely on internal stock-keeping unit (SKU) numbers rather than globally unique identifiers (JRC, 2026a, s. 5.2.1).
- **Partial readiness:** robustness test data. Tests are generally ISO-based but held as separate PDF reports, not structured data (JRC, 2026a, s. 5.2.1).
- **Low readiness:** concentration and location of substances. Stakeholders reported these are not available in a form that could be disclosed reliably and proportionately (JRC, 2026a, s. 5.2.1).
- **Recycled and organic content:** usually supported by chain-of-custody certification schemes (for example GRS, RCS and GOTS) at model or batch level. Data on the type of waste from which recycled material originates is not consistently available (JRC, 2026a, s. 5.2.1).
- **Environmental footprint:** calculated, where at all, at model level using the Product Environmental Footprint Category Rules for apparel and footwear. Stakeholders considered batch-level calculation impracticable (JRC, 2026a, s. 5.2.1 and 5.2.3).

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On granularity, the study finds that:

- **Model level** is current practice for external communication (JRC, 2026a, s. 5.2.3).
- **Batch level** is feasible for production, testing, certification and traceability data. Industry definitions of a "batch" vary, however (JRC, 2026a, s. 5.2.3).
- **Item level** is seen as achievable only through phased implementation, for example an inheritance model in which each item's passport is derived from batch-level data and updated after events such as repair or recycling (JRC, 2026a, s. 5.2.3).

Intended uses. The JRC proposed content is derived from thirteen use cases (JRC, 2026a, s. 6.1 and Annex 1), including:

- automated completeness checks before registration;
- customs controls;
- market surveillance;
- statistical monitoring, including detection of fast-fashion practices through model identifiers, operator identifiers and manufacturing dates;
- verification for green public procurement;
- consumer purchasing decisions, care and self-repair;
- business-to-business data exchange for resale and repair;
- data exchange to support sorting at end of life.

The JRC study also notes that a delegated act may set rules on who updates DPP data and on the events that trigger an update. Examples include repair, change of ownership and end-of-life treatment (JRC, 2026a, s. 2.1.4.3).

Proposed data points, granularity and access rights. The JRC proposes four categories of DPP content (product identification and classification, producer information, product characteristics, and compliance documentation), each data point with a reference methodology and data type (JRC, 2026a, s. 7). It recommends batch identifiers as the minimum requirement, with item-level identifiers on a voluntary basis (currently under analysis), and assigns each data point to model or batch level; for example, composition and footprint at model level, and operators, facilities and substances of concern at batch level (s. 9.1, Table 13). It proposes three access tiers (public, authorities only and legitimate interest) and allocates each data point to one of them (s. 9.2, Table 14). On governance, an operator that modifies a product and places it on the market would assume the manufacturer's DPP responsibilities, and the DPPs of repurposed or remanufactured products may need to be linked to those of the originals (s. 9.3).

Tables 33, 34, 35 and 36 below summarise the candidate set of DPP data points for textile apparel proposed by the JRC study (2026a)[64]. The JRC derives these data points from an analysis of data needs that takes into account the ESPR framework, existing disclosure obligations under other Union law, current industry practice and the use cases identified for the DPP. It groups them into four categories: product identification and classification; producer information; product characteristics, covering material, mechanical and chemical properties, recyclability, recycled and organic content, environmental footprint, and manuals and instructions; and compliance documentation. For each data point, the table gives the reference methodology, the ESPR provision it relates to and the JRC's assessment of industry readiness. The proposals are anticipatory: they still require stakeholder validation and an impact assessment, and they will become binding only to the extent that they are taken up in the textile delegated act. The study also allows other voluntary entries, provided they do not duplicate regulated fields. Voluntary entries should not relate to sustainability unless the delegated act defines them, so as to prevent greenwashing (JRC, 2026a, s. 7, p. 40).

[64] JRC (2026a).

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The "Status" column indicates how the JRC treats each data point. "Proposed" marks a candidate information requirement. "Voluntary" indicates that the study suggests the data point could be optional. "De-prioritised" signals that the study suggests it may be dropped, as its expected benefits may not justify the costs and administrative burden involved. Finally, "Self-declaration only" refers to data points needed only where the manufacturer declares compliance itself, rather than relying on third-party certification. In that case, the operator provides the underlying calculation parameters so that market surveillance authorities can recalculate the results (JRC, 2026a, s. 7.4, p. 53).

Data point	Reference methodology	ESPR ref.	Readiness (JRC)	Status
Unique product ID	SGTIN (item-level), compliant with prEN 18219	Annex III(b)	Very low	Voluntary, if item-level granularity is chosen
Batch ID	GTIN + lot number, compliant with prEN 18219	Annex III(b)	Medium (batch definitions vary)	Proposed
Model ID	GTIN-13, compliant with prEN 18219	Annex III(c)	High	Proposed
Product ESPR category	ESPR classification (knitted, woven, high denim product)	Scope of the delegated act	Medium	Proposed
Product PEFCR category	PEFCR for Apparel and Footwear	Scope of the delegated act	Medium	Proposed (identifies the footprint benchmark)
Commodity code: HS (6-digit)	WCO Harmonized System	Annex III(d)	Very high	Proposed
Commodity code: TARIC (10-digit)	TARIC XML schema	Annex III(d)	Very high	Proposed

Table 33. Category 1 — Product identification and classification. Source: JRC, 2026a.

Data point	Reference methodology	ESPR ref.	Readiness (JRC)	Status
Manufacturer unique operator identifier	Party GLN (prEN 18219) and EORI, if available	Annex III(g)	High	Proposed
Manufacturer name, postal address, contact information	Free text (ISO/IEC 6523); e-mail or other electronic means	Annex III(g)	High	Proposed
Unique facility identifier(s)	GLN (prEN 18219); facility = place of manufacture	Annex III(i)	High	Proposed

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Importer unique operator identifier	Party GLN (prEN 18219) and EORI	Annex III(j), (h)	High	Proposed, only where the manufacturer is outside the EU
Importer name, postal address, contact information	Free text (ISO/IEC 6523); e-mail or other electronic means	Annex III(j)	High	Proposed, only where the manufacturer is outside the EU
Other responsible operator identifier	Party GLN (prEN 18219) and EORI	Annex III(k)	High	Proposed, where it differs from the manufacturer or importer
Other responsible operator name, address, contact information	Free text (ISO/IEC 6523); e-mail or other electronic means	Annex III(k)	High	Proposed, as above

Table 34. Category 2 — Producer information. Source: JRC, 2026a.

Sub-group	Data point	Reference methodology	ESPR ref.	Readiness (JRC)	Status
Material information	Fibre composition	Textile Labelling Regulation (clean dry mass)	Annex I(d), Annex III(a)	Very high	Proposed (already required by the TLR)
	Components specification	GTIN-13 or equivalent (prEN 18219)	Art. 7(2)(b), Annex I(b)	Medium	Voluntary, de-prioritised
Mechanical properties	Robustness score	To be set in the delegated act (described in the preparatory study)	Art. 7(2)(b), Annex I(a)	Medium	Proposed
Chemical properties (substances of concern)	Name or numerical code: IUPAC or other international name; other names; EC number; CAS name and number	REACH-based identifiers	Art. 7(5), Annex I(f)	Low	Proposed
	Location within the product	Free text	Art. 7(5), Annex I(f)	Low	Proposed

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	Concentration, maximum concentration or range, at product level	% w/w of the article (REACH definition)	Art. 7(5), Annex I(f)	Low	Proposed
	Instructions for safe use	Free text; standard wording if no instructions are needed	Art. 7(5), Annex I(f)	Low	Proposed
	Information for disassembly, reuse, recycling and end of life	Free text	Art. 7(5), Annex I(f)	Low	Proposed
Recyclability	Recyclability score	To be set in the delegated act	Annex I(d), Annex III(a)	Medium	Proposed
Recycled content	Recycled content (% w/w)	To be set in the delegated act (based on ISO 14021:2016)	Annex I(h)	Medium	Proposed
	Origin of recycled content	Post-industrial, pre- or post-consumer waste (ESPR terms)	Annex I(h)	Low	Proposed
Organic content and ecolabels	Organic content (% w/w)	To be set in the delegated act (Organic Regulation (EU) 2018/848)	Annex III(a)	Medium/low	Voluntary
	EU Ecolabel	EU Ecolabel (yes/no)	Annex III(a)	Low	Voluntary
Product footprint	Carbon footprint, class of performance	To be set in the delegated act, based on the PEFCR (climate change)	Annex I(n)	Very low	Proposed
	Environmental footprint, class of performance	To be set in the delegated act, based on the PEFCR (single score)	Annex I(n), as cited by the JRC[65]	Very low	Proposed

[65] The JRC cites Annex I(n) for both footprints; in the ESPR, the environmental footprint corresponds to Annex I(m).

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Manuals and instructions	Care instructions	Textile Labelling Regulation; ISO 21600:2019	Annex III(a), (f)	High	Proposed
	Repair instructions	Free text (webpage link)	Art. 7(2)(b), Annex I(b)	Low	Voluntary, de-prioritised
	Contact for repair services offered by the brand	Free text (ISO/IEC 6523)	Art. 7(2)(b), Annex I(b)	Medium	Voluntary (only if repair services are offered)
	Warranty duration (commercial guarantee beyond the 2-year legal minimum)	ISO 22059:2020; Consumer Rights Directive as amended by the Empowering Consumers Directive	Art. 7(2)(b), Annex I(a)	Medium	Proposed

Table 35. Category 3 — Product characteristics. Source: JRC, 2026a.

The JRC study proposes two ways of verifying performance data. In the first, the operator self-declares and a third party certifies; only the certificate goes in the DPP. In the second, the operator self-declares alone and adds the calculation parameters, so authorities can recalculate the results (s. 7.4, p. 53).

Sub-group	Data point	Reference methodology	ESPR reference	Readiness (JRC)	Status
Mechanical properties (robustness)	Visual inspection	Test results, ISO 15487	Art. 7(2)(b), Annex I(a), III(e)	Medium	Self-declaration only
	Spirality	Test results, ISO 16322-3 (%)	as above	Medium	Self-declaration only
	Dimensional change	Test results, ISO 3759 (%)	as above	Medium	Self-declaration only
	Conformity certification / conformity declaration	Verification rules to be set in the delegated act	Annex III(e)	—	Third-party or self-declaration
Recyclability	Conformity certification / conformity declaration	Verification rules to be set in the delegated act	Annex III(e)	—	Third-party or self-declaration

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Recycled content	Weight excluding trims	kg (EN ISO 80000-1); TLR clean dry mass	Annex III(e)	High	Self-declaration only
	Amount of recycled material	kg; method to be set (based on ISO 14021:2016)	Annex I(h), III(e)	Medium	Self-declaration only
	Conformity certification / conformity declaration	Verification rules to be set in the delegated act	Annex III(e)	Medium	Third-party or self-declaration
Organic content	Weight excluding trims	kg (EN ISO 80000-1); TLR clean dry mass	Annex III(e)	High	Self-declaration only
	Amount of organic material	kg; Organic Regulation (EU) 2018/848	Annex III(e)	Medium/low	Self-declaration only
	Conformity certification / conformity declaration	Verification rules to be set in the delegated act	Annex III(e)	Medium/low	Third-party or self-declaration
Product footprint	Carbon footprint, absolute value	kg CO_2e/kg; based on the PEFCR	Annex I(n), III(e)	Very low	Self-declaration only
	Carbon footprint compared with the PEFCR benchmark	% of the benchmark	Annex I(n), III(e)	Very low	Self-declaration only
	Environmental footprint, absolute value	Environmental points/kg; based on the PEFCR	Annex I(n), III(e)	Very low	Self-declaration only
	Environmental footprint compared with the PEFCR benchmark	% of the benchmark	Annex I(n), III(e)	Very low	Self-declaration only
	Weight, including trims (average final product weight)	kg (EN ISO 80000-1), aligned with the PEFCR	Annex III(e)	High	Self-declaration only
	Conformity certification / conformity declaration	Verification rules to be set in the delegated act	Annex III(e)	Very low	Third-party or self-declaration

Table 36. Category 4 — Compliance documentation. Source: JRC, 2026a.

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Where the self-declaration route applies, the delegated act may require additional data points and technical documentation beyond those listed in Table 36. The JRC mentions chain-of-custody information, energy-mix data and digital traceability records as examples (JRC, 2026a, Table 8, note, p. 56). The final list of data fields, the required granularity, the allocation of access rights, the data carrier and any durability or testing requirements will be set only in the delegated act itself, after consultation and impact assessment (JRC, 2026a, s. 1 and 3.1).

Report-relevant observation: *Relevance for LIFE DPP-TEX. Three of the JRC's scoping choices bear directly on the project pilots. Bulgarian pilot (WP4): the pilot concerns home textiles and recycled fibres, which would both fall outside the proposed apparel delegated act. Home textiles are not apparel, and fibres are intermediate products. A DPP for that flow would therefore be voluntary, or anticipate a later act. Spanish pilot (WP5): workwear would be within scope, except where it qualifies as personal protective equipment. The pilot's product range should therefore be checked against Regulation (EU) 2016/425. Upcycled products (WP5): the treatment of upcycled apparel under the delegated act has been left to the impact assessment. Under the textile EPR regime, by contrast, the position is already settled: operators placing reused or upcycled textiles on the market are not "producers" (Art. 3(4b) WFD, as amended by Directive (EU) 2025/1892; see Section 2.1.2), and Bulgarian law already exempts operators placing second-hand textiles and footwear on the market from EPR (Art. 14(15) ЗУО; see Section 2.1.3). The practical implications for both pilots are set out in Section 3.*

ESPR delegated act for textiles and apparel	
Type of Act	Delegated Regulation
Status	In preparation (expected around 2027)
Brief summary	The ESPR establishes the DPP as a horizontal framework, but its actual content and application date for textiles depend entirely on the forthcoming apparel-specific delegated act — expected to be adopted in 2027 and applicable from around 2028–2029, given the mandatory 18-month lead time under Article 4.4 ESPR (save in duly justified cases).
Impact on LIFE DPP-TEX	High

Table 37. Legislation Overview.

2.2.2 Other anticipated legislation

EU level

Ecodesign requirements for sustainable and circular apparel textiles. The preparatory study process is more structurally layered than a single delegated act track. The JRC's own published work-stream diagram confirms that the ongoing preparatory study (tracked under ESPR product group 467, and building directly on the ESPR proposal and EU Strategy for Sustainable and Circular Textiles both originally presented in March 2022) feeds into three separate legal outputs proceeding in parallel: (i) the ESPR ecodesign and DPP delegated act for apparel itself, addressed in the preceding paragraphs; (ii) a mandatory EU Green Public Procurement (GPP) criteria for apparel, to be adopted as a separate Implementing Act; and (iii) a revision of the EU Ecolabel criteria for apparel, running alongside a further, distinct revision for home/interior textiles and textile cleaning products. The GPP workstream is of particular practical relevance given the LIFE DPP-TEX project's own Spanish pilot on the reuse and recycling of discarded municipal workwear: once adopted, mandatory GPP criteria for apparel would directly condition how public bodies such as municipalities may

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lawfully procure textile products, adding a further, procurement-side layer of obligation running alongside, and informed by, the DPP itself.

The substantive content of the eventual delegated act, while not yet settled, is already being shaped by targeted data-gathering exercises. The JRC circulated a dedicated Substances of Concern questionnaire for textile apparel in December 2024, collecting primary industry data on chemical content specifically to inform the draft performance and information requirements to be consulted upon — directly feeding the substances-of-concern DPP fields already analysed in this report's earlier reconstruction of Annex I (f) and Article 7.5 ESPR. Independent policy analysis of the preparatory process (IEEP, April 2025) further indicates the illustrative range of parameters under consideration, including life-cycle maximum emissions to water and air, water consumption, waste generation, recycled content, carbon footprint, minimum reliability and durability thresholds, affordable access to spare parts, and content of sustainable renewable raw materials.

Footwear remains formally excluded from the first ESPR Working Plan and this preparatory study, the Commission's own stated rationale being its relatively lower impacts, improvement potential and market value compared to apparel — a position that is not permanent, since products outside the first Working Plan remain eligible for inclusion in later cycles, and a separate Commission study assessing footwear-specific ecodesign requirements is already under way. Separately, the unsold-goods destruction ban already addressed earlier is, in its current form, expressly limited in scope to apparel and footwear specifically among consumer products, applying to large undertakings from 19 July 2026 — a horizontal ESPR measure that pre-dates and operates independently of the apparel-specific ecodesign and DPP delegated act still in preparation.

Ecodesign requirements for sustainable and circular apparel textiles	
Type of Act	Delegated Regulation
Status	Preparatory study; 4th milestone expected end 2026
Brief summary	The JRC's preparatory study for apparel feeds into three parallel legal outputs — the ESPR ecodesign/DPP delegated act, mandatory EU Green Public Procurement criteria, and a revised EU Ecolabel — with the GPP workstream directly relevant to the Spanish pilot's municipal workwear procurement. The study is also shaping the delegated act's likely DPP content (substances of concern, carbon footprint, durability, recycled content), while footwear remains excluded from this first cycle, pending a separate Commission study.
Impact on LIFE DPP-TEX	High

Table 38. Apparel preparatory study: parallel workstreams.

Digital product passport – rules for service providers. The forthcoming Delegated Act — formally titled, per the Commission's own published planning reference, "Delegated Act setting out requirements to be followed by DPP service providers, and a conformity assessment scheme to verify such requirements" (Ares(2024)8031852) — has a direct and explicit legal anchor within the ESPR itself: Article 2.32 of Regulation (EU) 2024/1781 defines a "digital product passport service provider" as an independent third party, authorised by the relevant economic operator, that processes DPP data for the purpose of making it available to economic operators and other actors with a right of access under the Regulation or other Union law. This is not a sector-specific instrument in the manner of the apparel delegated act addressed in the preceding section of this report; it is a horizontal act, empowered under the general DPP governance provisions of Article 11 ESPR (already addressed earlier, specifically the rules on data storage,

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authentication, reliability, integrity and security), and applicable across every product group once its own DPP obligations take effect, rather than being confined to textiles.

Substantively, this act will define the operational, technical and security obligations that a DPP service provider must meet when processing DPP data on an economic operator's behalf, consistent with the essential requirements of Article 11 ESPR on data storage, authentication, reliability, integrity and security (see Section 2.1.1, Table 4). It will also establish a conformity assessment scheme to verify compliance with those obligations, whose form, including any requirement for third-party verification, remains to be determined. At a minimum, economic operators must make a back-up copy of the DPP available through a DPP service provider (Article 10.4 ESPR), and that provider will have to meet the requirements of this act. The act therefore gives practical effect to Annex III(l) ESPR, which provides for the DPP to include a reference to the service provider hosting its back-up copy: it will determine who may lawfully perform that role. Because the service-provider layer must be in place before sector-specific DPPs can operate, this act is expected among the earlier DPP-related delegated acts, ahead of the apparel delegated act.

For this report, the practical significance is as follows. Once the apparel delegated act applies, a textile SME, or, in the context of LIFE DPP-TEX, the CircularPass platform on which the project's DPP solution is built, will need to ensure that the back-up copy of each DPP is held by a DPP service provider that meets the requirements of this horizontal act, and should anticipate that any platform storing or transmitting DPP data on its behalf may also be subject to them. This adds a second, independent compliance layer, distinct from the textile-specific content requirements: a textile SME's DPP obligations will not be fully discharged by populating the correct data fields alone, but will also depend on the compliance of the service provider used. This report therefore recommends that the progress of this act be tracked alongside, and cross-referenced with, that of the apparel delegated act.

Digital product passport – rules for service providers	
Type of Act	Delegated Regulation
Status	In preparation (draft act)
Brief summary	This horizontal delegated act will set the requirements for DPP service providers and a conformity assessment scheme (form to be determined). At a minimum, the back-up copy of each DPP must be held by a provider meeting these requirements (Art. 10(4) ESPR), so a textile SME's compliance will also depend on the service provider it uses, such as the CircularPass platform in LIFE DPP-TEX.
Impact on LIFE DPP-TEX	High

Table 39. Legislation Overview.

Ecodesign requirements on product repairability. This measure is one of the horizontal requirements announced in the first Ecodesign for Sustainable Products and Energy Labelling Working Plan 2025–2030 (COM(2025) 187, adopted on 16 April 2025, addressed earlier in this analysis). The Working Plan provides for four final products, two intermediate products and two legal acts setting horizontal requirements. The horizontal acts cover repairability, including scoring, and recycled content and recyclability of electrical and electronic equipment, with repairability indicatively expected in 2027. The repairability measure is therefore planned as a self-standing horizontal act, not as a component of each sector-specific delegated act. Its scope is not yet settled. In the Working Plan's own description, it is to be refined during the preparatory study and could include products such as consumer electronics and small household appliances. Textiles are not mentioned within its intended scope.

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For the textile sector, the measure is accordingly unlikely to apply directly. Repairability may nonetheless reach textile products through a different route. Annex I ESPR lists ease of repair and maintenance among the product parameters on which ecodesign requirements may be based, and Article 7.2 (b) (i) ESPR allows a repairability score to be required as product information, including through the DPP. Whether apparel will carry repairability requirements or a repairability score will therefore depend on the content of the apparel delegated act, currently in preparation, and not on the horizontal measure.

Ecodesign requirements on product repairability	
Type of Act	Delegated regulation (horizontal)
Status	In preparation
Brief summary	Horizontal measure under the ESPR Working Plan, indicatively 2027; intended scope (consumer electronics, small household appliances) does not include textiles. Repairability requirements for apparel, if any, would come from the apparel delegated act.
Impact on LIFE DPP-TEX	Low (n/a to textiles)

Table 40. Legislation Overview.

EU Green Claims Directive. The Commission's original proposal (COM(2023) 166, adopted 22 March 2023) sets out, at Article 3, the substantiation methodology that would apply to any "explicit environmental claim" made to consumers. A trader would be required to carry out an assessment demonstrating, inter alia, whether the claim covers the whole product or only specific life-cycle stages, reliance on widely recognised scientific evidence and the latest technical knowledge, and — critically for present purposes — that the claimed environmental impact, aspect or performance is significant from a life-cycle perspective. Article 3.4 of the proposal further empowers the Commission, where monitoring reveals obstacles to the internal market or widespread misleading of consumers, to adopt delegated acts supplementing the substantiation requirements, including by establishing specific life-cycle-based rules for certain product groups and sectors (point (c)). In the Commission's proposal these rules are not tied to a particular method; an express reference to the EU Environmental Footprint methods and Product Environmental Footprint Category Rules (PEFCRs) was introduced in the Council's negotiating text. The proposal does not establish PEF as the single required method for all claims. This life-cycle, evidence-based substantiation standard draws on precisely the same categories of data that a delegated act may require on the basis of the product parameters in Annex I ESPR — carbon footprint (Annex I (n)), environmental footprint (Annex I (m)), material footprint (Annex I (o)), and recycled or renewable material content (Annex I (h)–(i)). A textile SME with an accurately populated DPP, once the applicable delegated act enters into force, would accordingly already hold much of the underlying evidentiary base Article 3 substantiation would require — reinforcing, rather than duplicating, the compliance burden.

A second, more structurally significant point concerns the proposal's verification architecture. As negotiated, the proposal would require ex-ante certification of conformity by an accredited, independent national "verifier" body before an explicit environmental claim may be made public (with verification to be completed, in principle, within 30 days). However, the Council's general approach introduced a new Article 3a establishing a simplified procedure, exempting from full third-party verification any claim that has already been certified under a recognised ecolabel scheme, or that complies with the substantiation methodology of another EU legislative act.

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EU Green Claims Directive	
Type of Act	Directive
Status	Proposal pending (COM(2023) 166, procedure 2023/0085(COD)). Trilogue negotiations have been suspended since June 2025, following the Commission's announced intention to withdraw the proposal; it has not been formally withdrawn and is listed as pending in the 2026 Commission Work Programme (COM(2025) 870). The European Parliament's Legislative Train Schedule classifies the file as 'blocked'[66].
Brief summary	The Green Claims Directive's proposed substantiation standard (life-cycle evidence, carbon/environmental footprint, recycled content) draws on the same data categories already mandated as DPP content under Annex I ESPR, meaning an accurately populated DPP would already hold much of the evidence needed.
Impact on LIFE DPP-TEX	Medium
Legislative train	Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on substantiation and communication of explicit environmental claims (Green Claims Directive)[67]

Table 41. Legislation Overview.

Circular Economy Act. In its 2026 Work Programme, the Commission announced a legislative proposal for a Circular Economy Act for the third quarter of 2026.[68] Publication has since been postponed, following concerns raised by the Commission's Regulatory Scrutiny Board about the underlying impact assessment, and the proposal is now provisionally scheduled for 11 November 2026 (EUWID, October 2026). As of the date of this report, this new date has not been officially confirmed by the Commission, and the proposal has not yet been tabled. The Act is expected to address the harmonisation of extended producer responsibility schemes, waste classification and end-of-waste rules, and the creation of a single market for secondary raw materials, all of which bear on the data the DPP is designed to carry.

On substance, the Circular Economy Act's announced objectives are to help double the EU's circular material use rate to around 24% by 2030, create a single market for secondary raw materials, harmonise national extended producer responsibility schemes and revise end-of-waste criteria. These objectives map directly onto data categories that a delegated act may require in the DPP on the basis of the product parameters in Annex I ESPR: recycled and renewable material content (Annex I(h)–(i)), recovery of materials, including critical raw materials (see the CRMA analysis in Section 2.1.2), and waste generation (Annex I(r)). The Act builds on the policy agenda of the 2020 Circular Economy Action Plan, the document in which the DPP concept originated, and is therefore likely to reinforce rather than redirect the role of the DPP. As no proposal had been tabled at the date of this report, it is not yet possible to confirm whether the Act will contain DPP-specific provisions; this section should be revisited once the Commission's proposal is published.

[66] European Parliament, Legislative Train Schedule European Parliament. Substantiating and communicating green claims In “A European Green Deal”. Information updated as of 20/09/2026.
[67] Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on substantiation and communication of explicit environmental claims (Green Claims Directive). COM/2023/166 final (Document 52023PC0166).
[68] European Parliament, Legislative Train Schedule; EPRS, PE 782.628, January 2026.

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Circular Economy Act	
Type of Act	Not yet known (proposal not tabled)
Status	Announced in the 2026 Commission Work Programme (COM(2025) 870) for the third quarter of 2026; reportedly postponed to November 2026; not tabled as of 26 October 2026.
Brief summary	The Act's announced objectives (secondary raw materials, harmonised EPR, end-of-waste criteria) overlap with data the DPP is designed to carry under Annex I ESPR. It builds on the 2020 Circular Economy Action Plan, in which the DPP concept originated, and is expected to reinforce rather than redirect the DPP's role. Any link remains prospective until the proposal is published.
Impact on LIFE DPP-TEX	High (prospective)

Table 42. Legislation Overview.

SPAIN

The draft **Real Decreto regulating textile and footwear products and the management of their waste[69],** developed by MITECO pursuant to the seventh final provision (*disposición final séptima*) of Ley 7/2022, represents Spain's principal domestic vehicle for transposing the textile and footwear extended producer responsibility regime introduced by Directive (EU) 2025/1892 — already addressed in this report — and completed its public consultation phase on 4 September 2025, though it had not, as of the most recent information available, been formally enacted. The draft establishes producer responsibility through one or more collective compliance schemes (*sistemas colectivos de responsabilidad ampliada del productor,* or "SCRAP"), subject to authorisation by the Autonomous Communities valid for eight years, under which manufacturers and importers must finance and organise the separate collection, sorting, preparation for reuse and recycling of the textile and footwear products they place on the Spanish market, in accordance with the "polluter pays" principle and calibrated to each producer's environmental characteristics and market share. The draft sets binding numerical targets that go materially beyond the EU-level framework: a reduction in the overall weight of textile and footwear waste generated of 5% by 2030 and 10% by 2035 (measured against 2027 levels), separate collection covering at least 50% of the relevant waste stream by 2030 and 70% by 2035, and preparation for reuse of at least 20% of separately collected material by 2030, rising to 35% by 2035. Consistent with the prohibition on destroying unsold apparel and footwear under Article 25 ESPR, the draft expressly bars the destruction, incineration or elimination of unsold textile and footwear products, requiring donation, reuse or recycling to be prioritised instead.

Two further elements of the draft are of direct relevance to the present report's broader analysis. First, it creates a dedicated textile-and-footwear section within Spain's existing Registro de Productores de Productos, requiring annual declaration of the quantities placed on the market — reinforcing the registration architecture already discussed in connection with Directive (EU) 2025/1892 — and requires non-Spanish producers to appoint an authorised representative established in Spain. Second, it imposes specific obligations directly on online platforms facilitating distance contracts between consumers and textile or footwear producers, requiring those platforms to obtain and verify the producer's registration number before permitting sales — a national-level echo of the Digital Services Act's Article 30 "know your business customer" regime already analysed, and a further point of practical convergence between Spain's forthcoming national EPR architecture and the DPP's own marketplace-accessibility requirements under Article 10.3 ESPR. Given that the Spanish textile and footwear sector generates an estimated 890,000 tonnes of waste annually and comprises more than 17,000 companies, the great majority of them SMEs,

[69] Draft Royal Decree regulating textile and footwear products and the management of their waste.

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this Real Decreto — once enacted — is likely to have material and near-term compliance implications for the SME, independently of, but running in parallel to, its eventual obligations under the textile-specific ESPR delegated act.

BULGARIA

Implementing ordinance on textile and footwear waste, and a documented transposition gap. Bulgaria introduced a statutory basis for extended producer responsibility for textile and footwear waste well before the harmonised EU regime. The amendments to the Waste Management Act (Закон за управление на отпадъците) published in ДВ, бр. 19 от 5.03.2021 г. made persons placing footwear and textiles on the market subject to EPR and regulated recovery organisations for footwear and textile waste (Article 84a ЗУО), with effect from 1 June 2021. However, the implementing ordinance needed to apply this regime in practice, a draft Наредба за отпадъците от обувки и текстил (Ordinance on Footwear and Textile Waste), has not yet been adopted. Its stated rationale is that the general EPR principle in the Waste Management Act does not sufficiently address the economic, social and environmental characteristics of this waste stream. In addition, a government bill amending the Waste Management Act was submitted to the National Assembly on 13 November 2025; it would introduce separate collection of textile and footwear waste through extended producer responsibility. More significantly for this report's regulatory watch, the European Commission has found that Bulgarian legislation incorrectly transposes the minimum requirements for EPR schemes, the monitoring and evaluation of waste-prevention measures, and the obligation to collect textiles separately, which should have applied from 1 January 2025. This is a distinct and pre-existing compliance gap, separate from the later deadline of 17 June 2027 for transposing the harmonised textile EPR regime under Directive (EU) 2025/1892.

A weight-based product fee for textiles and footwear is under development. The Ministry of Environment and Water has confirmed that it is preparing a product fee applicable to textiles and footwear, to be calculated by reference to the weight of quantities placed on the Bulgarian market and fixed through a further ordinance once the underlying analysis is complete. The monitoring and financial accountability of the resulting compliance schemes are expected to follow the same procedural framework already applied to Bulgaria's existing mass-waste-stream schemes. The Ministry has further confirmed that the new obligations will extend to all producers and traders placing textile or footwear products on the market, including those selling via e-commerce, irrespective of whether they are established within the EU or in a third country — a scope determination directly relevant to this report's earlier analysis of the Digital Services Act's marketplace due-diligence obligations.

Municipal-level implementation currently lags the nominal EU obligation. A source from Bulgaria's national association of municipalities confirms that, notwithstanding the EU-wide separate-collection obligation formally in force since January 2025, the secondary legislation and practical mechanisms needed for municipalities to give effect to that obligation remain absent, leaving local implementation without a clear regulatory basis at this time.

Direct relevance to the LIFE DPP-TEX project. Sirma Zheleva, Head of Sustainability Unit at TexCycle — the project's own Bulgarian pilot partner — and Executive Director of Bulgarian Association Circular Textile, stated publicly in August 2026 that Bulgaria has less than a year remaining to establish a functioning textile EPR system. Separately, and of direct significance to this report's institutional positioning, TexCycle is confirmed to be coordinating a national multi-stakeholder platform, through the VERDEinMED project, bringing together state institutions, municipalities, producers and importers, retailers, sectoral organisations, waste-management operators, recycling enterprises, and environmental policy specialists, specifically to prepare Bulgaria's textile EPR framework — meaning the project's own consortium partner is presently and directly engaged in shaping the very legislation the present report is required to monitor.

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THE NETHERLANDS

Revision of the Besluit UPV Textiel to implement Directive (EU) 2025/1892. The Ministry of Infrastructure and Water Management is preparing amendments to the Wet milieubeheer and to the existing Besluit UPV Textiel, which has been in force since 1 July 2023, to bring the national scheme into line with the harmonised EU regime. According to the Ministry's own implementation portal, the new obligations will apply to producers by spring 2028 at the latest. The revision brings three changes:

- Wider scope. The current scheme covers consumer clothing, workwear and household linen. It will extend to footwear (customs codes 6401–6405), home and interior textiles, curtains, hats, leather clothing and textile-related accessories, all of which are currently excluded.
- New duties for platforms and PROs. Online platforms will take on a verification role, mirroring the platform obligations in Spain's draft Real Decreto and the Digital Services Act duties addressed earlier. Producer responsibility organisations will carry greater responsibilities.
- Eco-modulation of fees. Fees will be linked to products' environmental performance. This is the statutory link to ESPR ecodesign criteria already identified as the formal hinge between textile EPR and the DPP.

Policy framework surrounding the revision: the **Beleidsprogramma Circulair Textiel 2025–2030** is a policy programme, not legislation, but it sets the Dutch legislative pipeline for textiles. Its measures include:

- developing circular design requirements for textiles under the ESPR (2025–2026);
- research into footwear design requirements;
- exploring a national repair register;
- further development of the UPV textiel with attention to repair;
- the amendment of the Besluit UPV Textiel described above;
- a full evaluation of the UPV textiel scheduled for 2028.

As mentioned in *Table 31. The Netherlands National Legislation Overview*:

- **CSRD implementation: still pending.** The **Wet implementatie richtlijn duurzaamheidsrapportering** (Kamerstukken 36 678) was submitted to the Tweede Kamer on 13 January 2025 and remained under consideration there at the date of this report. The Raad van State advised on the latest note of amendment, which incorporates the Omnibus I changes, on 5 June 2026, and a government reply to the committee followed on 2 October 2026. The substantive reporting obligations will be laid down in a separate *Implementatiebesluit richtlijn duurzaamheidsrapportering*. Because the implementing legislation was not in force by 1 October 2026, the *reparatieclausule* (transitional repair clause) announced by the government in its letter of 9 February 2026 (Kamerstukken 36 678, no. 11) is intended to cover financial year 2026 as well, once the legislation is adopted. A separate bill implementing the Omnibus "stop-the-clock" Directive was reportedly submitted on 22 December 2025, with retroactive effect from 1 January 2026.
- Right to Repair Directive: the implementing bill **(Wetgevingskalender reference WGK028011)** was submitted to the Tweede Kamer on 10 July 2026; the 31 July 2026 deadline has been missed.
- CSDDD: the **Wetsvoorstel internationaal verantwoord ondernemen** remains pending and is officially described as not on schedule.
- ECGT: transposed by the Implementatiewet richtlijn betere duurzaamheidsinformatie voor consumenten (Stb. 2026, 152); applies from 27 September 2026.

Report relevant observation. *The Netherlands is the only one of the three project jurisdictions where textile EPR already operates and already covers workwear explicitly. This makes the Dutch scheme a*

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useful reference point for the Spanish pilot on municipal workwear, and for bAwear BV's own operating context.

2.3 Alignment with EU Strategies, Plans and Deals

The LIFE DPP-TEX project must also be aligned with the EU Strategies, Plans and Deals listed below.

European Green Deal[70] and Climate Goals (2019). The European Green Deal ("EGD") was presented by the European Commission on 11 December 2019 as Communication COM(2019) 640 final, setting out the Union's roadmap to a climate-neutral, resource-efficient economy by 2050. It is important to note, for accuracy, that the EGD is not itself a binding legal instrument — it is a Commission Communication, a soft-law policy roadmap — but it has been progressively operationalised through binding legislation, most significantly the European Climate Law, Regulation (EU) 2021/1119 of 30 June 2021, which enshrines the 2050 climate-neutrality target as a legally binding obligation (Article 2(1)) together with an intermediate 2030 target of at least 55% net greenhouse gas reduction against 1990 levels, itself recently reinforced by a binding 2040 target of a 90% net reduction, introduced by Regulation (EU) 2026/667 of 11 March 2026.

The ESPR sits within this architecture as one of the delivery instruments through which the EGD's objectives are translated into sector-specific law, principally via the Circular Economy Action Plan strand of the Green Deal (presented in March 2020), which explicitly identified the need for a new ecodesign framework extending beyond energy-related products — the initiative that ultimately became Regulation (EU) 2024/1781. The link to the DPP is accordingly one of policy lineage and legal hierarchy rather than direct textual cross-reference: the EGD provides no operative rules of its own capable of being cited as a legal basis, but its Communication and the Circular Economy Action Plan are recited in the ESPR's own preamble as the policy origin and justification for the DPP's introduction, meaning the DPP should properly be understood as one of the concrete legislative instruments through which the Green Deal's 2050 and interim climate and resource-efficiency targets are being given binding effect at product level.

EU Industrial Strategy (2020)[71]. The EU Industrial Strategy was first presented by the Commission on 10 March 2020 as Communication COM(2020) 102 final, "A New Industrial Strategy for Europe"[72]. The concept of 14 industrial ecosystems was introduced in the 2021 update of the Strategy, Communication COM(2021) 350 final, "Updating the 2020 New Industrial Strategy: Building a stronger Single Market for Europe's recovery," presented on 5 May 2021, and detailed further in the accompanying Annual Single Market Report 2021 (SWD(2021) 351). That document identifies the fourteen ecosystems as: Aerospace & Defence, Agri-food, Construction, Cultural and Creative Industries, Digital, Electronics, Energy Intensive Industries, Energy-Renewables, Health, Mobility-Transport-Automotive, Proximity/Social Economy/Civil Security, Retail, Textiles, and Tourism — with the textiles ecosystem of direct relevance to this report's subject matter.

As with the Green Deal addressed in the preceding section, the Industrial Strategy and its 2021 update are soft-law Commission Communications rather than binding legislation, and neither instrument creates or references the DPP directly; the link to the ESPR is one of policy sequencing rather than legal cross-reference. The 2021 update's ecosystem-based approach identified textiles as a value chain with, in the Commission's own terms, "an urgent need and a strong potential for the transition to sustainable and circular production," a conclusion subsequently developed into the EU Strategy for Sustainable and Circular Textiles (2022) and the Transition Pathway for the Textiles Ecosystem (2023), both of which

[70] The European Green Deal - European Commission.
[71] Strategy - Internal Market, Industry, Entrepreneurship and SMEs - European Commission.
[72] COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE EUROPEAN COUNCIL, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS A New Industrial Strategy for Europe. COM/2020/102 final.

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expressly name the ESPR and its Digital Product Passport as the principal legislative instrument through which the sector's ecodesign and traceability requirements are to be delivered. For present purposes, the Industrial Strategy should accordingly be presented as the policy framework that identified textiles as a priority ecosystem requiring regulatory intervention — providing the sectoral rationale that led to textiles being selected among the first product groups under the ESPR Working Plan.

Circular Economy Action Plan (CEAP, 2020)[73]. The Circular Economy Action Plan was adopted by the Commission on 11 March 2020 as Communication COM(2020) 98 final, "A new Circular Economy Action Plan for a cleaner and more competitive Europe," and is, as stated, one of the principal building blocks of the European Green Deal. The CEAP identifies seven key product value chains: electronics and ICT; batteries and vehicles; packaging; plastics; textiles; construction and buildings; and food, water and nutrients. The CEAP is the document in which the DPP concept itself first appears in Union policy: Chapter 2.1 of COM(2020) 98, on designing sustainable products and business models, expressly identifies "Digital Product Passports" by name as a tool for mobilising the digitalisation of product information — predating the ESPR's legislative proposal by two years and its entry into force by more than four. The CEAP also launched the "Sustainable Products Initiative," the Commission workstream that was subsequently developed into the ESPR proposal of March 2022 and ultimately adopted as Regulation (EU) 2024/1781. The link between the CEAP and the DPP is accordingly not merely functional, as with most instruments addressed in this report, but genuinely originative: the CEAP is the policy document in which the DPP was conceived, named, and set on its legislative path toward the ESPR. The CEAP's policy agenda is now being carried forward by the Circular Economy Act, a legislative proposal announced in the 2026 Commission Work Programme for the third quarter of 2026 and reportedly postponed to November 2026 (see Section 2.2.2). Because the Act builds on the CEAP, its content should be monitored for any provisions that reinforce or extend the policy rationale underpinning the DPP.

EU Strategy for Chemicals for Sustainability (2020). The Chemicals Strategy for Sustainability was published by the Commission on 14 October 2020 as Communication COM(2020) 667 final, "Towards a toxic-free environment," and is expressly positioned by the Commission as part of the EU's zero pollution ambition and, through it, a commitment under the European Green Deal — sitting within the same policy family as the Zero Pollution Action Plan and Green Deal already addressed. Its core actions include banning the most harmful chemicals in consumer products except for essential uses, phasing out per- and polyfluoroalkyl substances (PFAS) unless essential, promoting the resilience and sustainability of critical chemicals supply, and establishing a "one substance, one assessment" process for chemical risk and hazard evaluation, which itself entered into force on 1 January 2026. As with the other Green Deal-derived Communications, it is a soft-law policy document and contains no reference to the ESPR or the DPP as such.

The Strategy's substantive relevance to the present report lies in its role as the direct policy origin of two instruments already analysed here in detail: it is the Strategy that launched the ongoing revision processes for both REACH and the CLP Regulation (the latter's revision proposal, introducing new hazard classes, was presented on 19 December 2022), meaning the substances-of-concern data the DPP is required to carry under Article 7(5) ESPR ultimately traces its regulatory lineage to this Strategy's chemicals-safety agenda. The Strategy's "safe and sustainable by design" concept — formalised in a Commission Recommendation of 8 December 2022 and reinforced by a further revised framework adopted on 6 March 2026 — is, moreover, conceptually the direct policy antecedent of the design-stage, life-cycle approach to hazardous substances that the ESPR itself embeds in its own ecodesign requirements. The Chemicals Strategy is therefore not a source of independent obligation for a textile SME, but a policy foundation underlying the REACH and CLP-derived substantiation data the SME will need to compile in order to populate the substances-of-concern fields of its products' future DPP.

[73] Circular Economy - Environment - European Commission.

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Zero Pollution Action Plan (2021)[74]. The Zero Pollution Action Plan was adopted by the Commission on 12 May 2021 as Communication COM(2021) 400 final, *"Pathway to a Healthy Planet for All — EU Action Plan: 'Towards Zero Pollution for Air, Water and Soil'"*[75], and is described by the Commission as a key deliverable of the European Green Deal, alongside the Chemicals Strategy for Sustainability. It sets a 2050 vision of pollution reduced to levels no longer considered harmful to health and natural ecosystems, accompanied by non-binding 2030 targets, including a 55% reduction in premature deaths from air pollution, a 50% reduction in marine plastic litter, a 30% reduction in microplastics released into the environment, and a 50% reduction in nutrient losses and in the use of chemical pesticides. A Mid-Term Review, *"Delivering clean air, ocean, freshwaters and soil"* (Report from the Commission, COM(2026) 42 final), was published on 29 January 2026, confirming that the Plan remains an active, monitored policy instrument. Like the other Communications derived from the Green Deal, the Action Plan is a non-binding policy document, and it does not refer to the DPP.

The connection to the DPP is accordingly functional, and runs through the substantive content the ESPR requires the DPP to carry rather than through any textual cross-reference. Two of the Zero Pollution Action Plan's core 2030 targets — reducing microplastic release and reducing the presence of hazardous chemicals in the environment — correspond directly to DPP data fields already verified earlier in this analysis: Annex I (p) ESPR lists microplastic and nanoplastic release as a product parameter on which ecodesign requirements may be based, while Article 7.5 ESPR requires delegated acts to enable the tracking of substances of concern, their location, and their concentration within a product. For the textile sector specifically, both parameters are directly relevant, given that synthetic textile fibres are a recognised significant source of microplastic release during washing and end-of-life degradation, and given the chemical treatments (dyes, finishes, flame retardants) already addressed in this report's earlier analysis of REACH and CLP. The Zero Pollution Action Plan should accordingly be understood as one of the environmental-policy drivers underlying the specific substantive content the ESPR's textile delegated act is expected to require of the DPP, rather than as an instrument imposing any obligation of its own on a textile SME.

EU Strategy for Sustainable and Circular Textiles (2022)[76]. The EU Strategy for Sustainable and Circular Textiles was presented by the Commission on 30 March 2022 as Communication COM(2022) 141 final, forming part of the Circular Economy Action Plan and, through it, the European Green Deal architecture already addressed. The Commission's own Communication, drawing on European Environment Agency data, states that EU textile consumption has, on average, the fourth-highest environmental and climate impact after food, housing and mobility, the third-highest impact in terms of water and land use, and the fifth-highest for primary raw material use and greenhouse gas emissions. As with the Green Deal, Industrial Strategy and CEAP addressed in the preceding sections, the Textile Strategy is a Commission Communication and therefore a soft-law policy instrument — it creates no binding obligations of its own.

The link to the DPP here is unusually direct and well-documented, in the same manner as the CEAP addressed previously: the Textile Strategy expressly announces, among its listed forthcoming actions, the introduction of ecodesign requirements for textiles and a DPP, together with measures to discourage fast fashion, harmonise extended producer responsibility rules, and address microplastic release — announced roughly two years before the ESPR itself entered into force on 18 July 2024. The Strategy's own 2022 indicative prioritisation for early ecodesign action identified "personal and household textiles, carpets and mattresses" as likely first candidates, a framing that differs somewhat from the product-group

[74] Zero Pollution Action Plan - Environment - European Commission.
[75] European Commission, *Pathway to a Healthy Planet for All — EU Action Plan: "Towards Zero Pollution for Air, Water and Soil"*, COM(2021) 400 final, Brussels, 12 May 2021; and Report from the Commission, *Mid-term review of the Zero Pollution Action Plan "Delivering clean air, ocean, freshwaters and soil"*, COM(2026) 42 final, Brussels, 29 January 2026. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52021DC0400
[76] Textiles Strategy - Environment - European Commission.

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categorisation ultimately adopted in the ESPR Working Plan 2025-2030 ("Textiles/Apparel," addressed separately from mattresses); this reflects the ordinary evolution of a policy communication into a more precisely delineated legislative work programme.

The Textile Strategy is therefore the direct sectoral policy antecedent of the textile-specific DPP obligation: it is the document in which the Commission first committed, at policy level, to extending ecodesign and passport requirements specifically to the textile sector, and the forthcoming textile-specific ESPR delegated act — still pending, as established earlier in this report — is properly understood as the binding legal instrument that will operationalise the non-binding commitments this Strategy set out in 2022. No obligation currently binds a textile SME under the Strategy itself; its relevance lies entirely in explaining the origin and policy rationale of the ESPR obligations that will, in due course, apply.

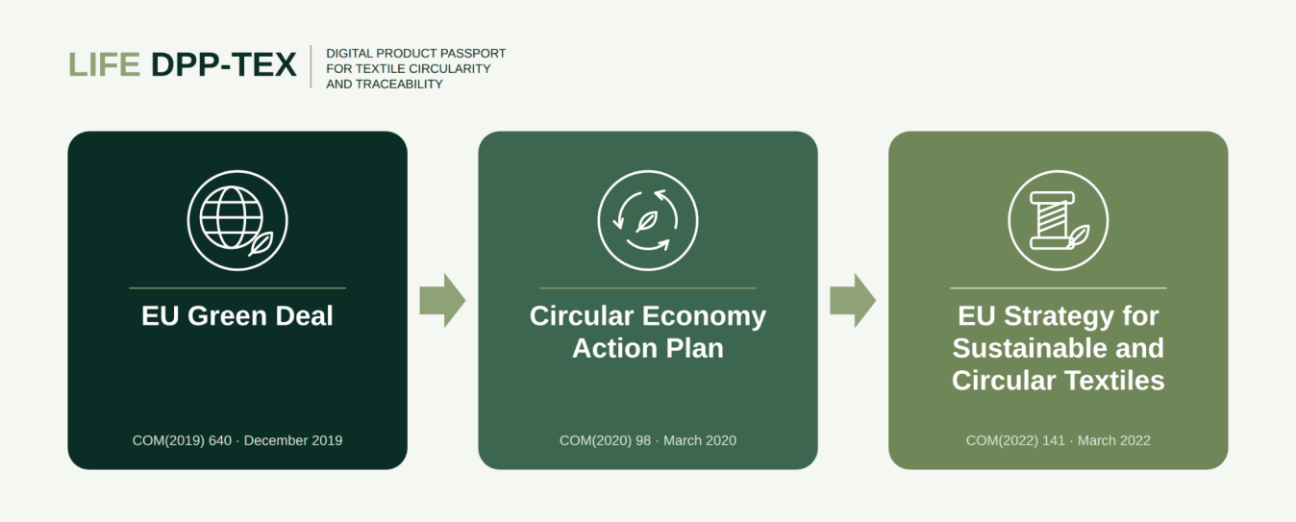


Figure 3. Policy origins of the textile DPP: from the European Green Deal to the EU Textile Strategy. Source: own elaboration.

Ecodesign and Energy Labelling Working Plan 2025-2030[77]. It is a Commission instrument adopted in 16 April 2025 under, and internal to, the ESPR's own priority-setting architecture. Its function is procedural rather than substantive: it identifies which product groups the Commission will prioritise for the adoption of product-specific delegated acts under Article 4 ESPR, and it is precisely those delegated acts — not the Working Plan itself — that will, per Article 8 ESPR, determine whether a DPP applies to a given product group, and define its content, conformity assessment module and implementation timeline. The Working Plan accordingly functions as the master schedule for the DPP's sector-by-sector rollout, rather than as a source of independent legal obligation. It covers the period 2025-2030 (five years, longer than the ESPR's own three-year statutory minimum for such plans) and provides for a mid-term review in 2028.

The Working Plan identifies six priority product groups, divided between final products — textiles and apparel (with footwear expressly treated separately, subject to a dedicated Commission study on the appropriateness of ecodesign requirements for that category), furniture, tyres, and mattresses — and intermediate products — iron and steel, and aluminium — together with horizontal measures on repairability (including a repairability scoring system) and recyclability of electrical and electronic equipment. Textiles and apparel were identified as the top priority within this first wave, reflecting a substantial market share (an estimated 78 billion EUR of the EU's 142 billion EUR textile and footwear market as of 2019[78]) and significant potential for improvement in durability, material efficiency, and reduction of water use, waste generation and microplastic release. The indicative delegated-act timelines

[77] 2025-2030 working plan - Green Forum - European Commission.
[78] COMMUNICATION FROM THE COMMISSION Ecodesign for Sustainable Products and Energy Labelling Working Plan 2025-2030, {SWD(2025) 112 final}, Brussels, 16.4.2025, COM(2025) 187 final, p. 5.

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are: iron and steel from 2026; textiles, tyres and aluminium from 2027; furniture from 2028; and mattresses from 2029.

Green Deal Industrial Plan (2023)[79]. The Green Deal Industrial Plan was presented by the Commission on 1 February 2023 as Communication "A Green Deal Industrial Plan for the Net-Zero Age", and is a major initiative of the European Green Deal aimed at enhancing the competitiveness of the EU's net-zero industry. Its substance is organised around four pillars — a predictable and simplified regulatory environment, faster access to funding, enhancing skills, and open and fair trade for resilient supply chains — with its principal legislative outputs being the Net-Zero Industry Act and, of direct relevance to this report, the Critical Raw Materials Act, already addressed in an earlier section. The Plan's focus is squarely on clean-technology manufacturing capacity (renewables, batteries, hydrogen, chemicals, biotech and nanotech), industrial funding instruments (the Temporary State Aid Crisis and Transition Framework, REPowerEU, InvestEU, the Innovation Fund), and skills development — it contains no reference to ecodesign requirements, the DPP, or the textile sector.

There is no textual cross-reference to the ESPR or the DPP in the Plan itself, and unlike the Circular Economy Action Plan or the Textile Strategy addressed earlier — both of which explicitly name the DPP as a forthcoming policy tool — the Green Deal Industrial Plan does not engage with product-level information or traceability requirements at all. Its relevance to this report is indirect and twofold: first, as a sibling initiative within the same European Green Deal architecture, sharing its overarching climate-neutrality rationale; and second, through the one instrument it did produce that has already been shown to bear on ESPR Annex I's material-recovery parameters — the Critical Raw Materials Act.

EU Competitiveness Compass (2025)[80]. The Competitiveness Compass was presented by the Commission on 29 January 2025 as Communication "A competitiveness compass for the EU," building on the three necessities identified in the Draghi Report on European competitiveness[81]: closing the innovation gap, decarbonising the economy, and reducing strategic dependencies. As with the other Commission Communications addressed, it is a soft-law policy roadmap rather than binding legislation, and it contains no direct reference to the ESPR, the DPP, or the textile sector. Its substantive focus lies elsewhere — innovation policy (the EU start-up and scale-up strategy, the "Apply AI" strategy, a proposed "28th legal regime" for EU-wide company law), decarbonisation of energy-intensive industry via the Clean Industrial Deal and sector-specific action plans for chemicals, steel and metals, and reducing external dependencies through clean trade partnerships and reformed public procurement rules.

The connection to this report is nonetheless material, and arises through one of the Compass's five declared "horizontal enablers": cutting red tape through the omnibus simplification proposals. This is the direct policy origin of the Omnibus I package — most notably Directive (EU) 2026/470, which substantially narrowed the personal scope of both the CSRD and the CSDDD, and the related simplification of the European Sustainability Reporting Standards. While the Competitiveness Compass itself does not touch the ESPR or the DPP, it is the strategic document that set the deregulatory and simplification agenda under which those adjacent sustainability-reporting instruments were subsequently amended — meaning its relevance to the present report lies in explaining the broader policy climate (favouring reduced administrative burden, particularly for SMEs) within which any future textile-specific ESPR delegated act, and its accompanying DPP data requirements, are now being negotiated and drafted.

Clean Industrial Deal (2025)[82]. The Clean Industrial Deal was launched by the Commission on 26 February 2025, presented as a plan to turn industrial decarbonisation into a driver of EU competitiveness, and

[79] The Green Deal Industrial Plan - European Commission (COM/2023/62 final).
[80] Competitiveness compass - European Commission.
[81] The Draghi report on EU competitiveness.
[82] Clean Industrial Deal - European Commission.

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organised around measures addressing affordable energy, demand for clean products (including the Industrial Accelerator Act presented in March 2026), financing the clean transition, circularity and access to materials, global trade action (including a strengthened Carbon Border Adjustment Mechanism, already addressed), and skills. It is a policy document rather than binding legislation, and it contains no direct reference to the ESPR, the DPP, or the textile sector specifically.

The Deal's most relevant element for this report lies within its "circularity and access to materials" pillar, which commits the Commission to adopting a Circular Economy Act in 2026 (see Section 2.2.2 for its current timing). The Act is a legislative proposal building on the policy agenda of the 2020 CEAP, in which the DPP concept originated, and is intended to contribute to the objective of raising the EU's circular material use rate to 24% by 2030. The Clean Industrial Deal thus provides the immediate political mandate for that forthcoming Act, confirming that the CEAP's policy line, including its commitment to the DPP, remains active and evolving.

Monitoring Framework for the Circular Economy (2018)[83]. The Monitoring Framework for the Circular Economy was first published by the Commission on 16 January 2018 as Communication COM(2018) 29 final, and it is a statistical monitoring tool — a set of indicators tracking EU-wide progress on production and consumption, waste management, secondary raw materials, and competitiveness/innovation — rather than a legislative or DPP-related instrument. This original 2018 framework has since been substantively revised: the Commission published a Revised Monitoring Framework for the Circular Economy on 15 May 2023 (Communication COM(2023) 306), adding new indicators on material footprint, resource productivity, and critical raw material self-sufficiency.

Neither the original nor the revised Monitoring Framework contains any reference to the ESPR or the DPP — unsurprising, since the 2018 version predates the ESPR by six years. The connection to this report is accordingly indirect, but on the EESC's own 2018 opinion[84] the Committee explicitly criticised the original framework for lacking an indicator on eco-design, among other gaps, calling for it to be added — a direct anticipation, five years before the ESPR's adoption, of the ecodesign-based approach the EU would ultimately take. For present purposes, the Monitoring Framework (in either version) should be understood as the EU's statistical scorecard for evaluating whether circular economy policy is succeeding at the macro level, functioning as a downstream evaluative tool for the same policy objectives the DPP is designed to help deliver at product level.

Extended Producer Responsibility (EPR)

Legal basis and structure. The relevant instrument is Directive (EU) 2025/1892 of 10 September 2025, amending the Waste Framework Directive (2008/98/EC), published in the Official Journal on 26 September 2025 and in force from 16 October 2025. It inserts seven new articles into the WFD — Articles 9a, 22a, 22b, 22c, 22d, 29a and 41a — together with a new Annex IVc[85], and creates the EU's first harmonised extended producer responsibility regime for textiles, textile-related products and footwear, alongside separate,

[83] Monitoring Framework for the circular economy - European Commission.
[84] European Economic and Social Committee's advisory opinion responding to that Communication (NAT/722-EESC-2018-00464, adopted 11 July 2018, published in OJ C 367 of 10.10.2018), issued by the EESC's Section for Agriculture, Rural Development and the Environment — a consultative opinion commenting on the Commission's framework.
[85] The products covered are identified by their Combined Nomenclature codes, listed in Annex IVc ("Products that fall within the scope of the extended producer responsibility for certain textile, textile-related and footwear products"), which the Commission may update by delegated act (Art. 22a(5) and Recital 28 WFD, as amended by Directive (EU) 2025/1892). The scheme covers products for household use and products for other uses, including professional uses, where they are similar in nature and composition to household products. Products for professional or military use that may pose safety, health or hygiene risks or raise security concerns are excluded (Recital 28). Mattresses do not fall within Annex IVc: Member States may set up a separate EPR scheme for them (Art. 22a(2)). Operators supplying used products assessed as fit for re-use, or products derived from used or waste textiles, including upcycled products, are not "producers" for EPR purposes (Art. 3(4b) and Recital 22).

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unrelated binding food-waste-reduction targets addressed in the same instrument. This corrects the pre-existing gap under the WFD, which had already required Member States to collect textiles separately from 1 January 2025 without specifying who bears the cost.

The central link to the DPP: eco-modulation of EPR fees against ESPR ecodesign parameters. The Directive requires Member States to harmonise the criteria for modulating EPR fees on the basis of the most relevant ecodesign parameters, and specifies that this modulation "should be based on the ecodesign requirements and their measurement methodologies that are adopted pursuant to Regulation (EU) 2024/1781 for textile and footwear products" (Recital 39) — with recourse to other harmonised Union sustainability criteria only where ESPR-specific ones have not yet been adopted. This is the formal statutory hinge between the WFD/EPR regime and the ESPR: the Directive does not create ecodesign criteria of its own, it consumes those the ESPR adopts, and a producer's EPR fee will, as a matter of law, be calculated in part by reference to the same durability, reparability, recyclability and recycled-content parameters on which a delegated act may base its requirements (Annex I ESPR).

The practical consequence is that the DPP becomes the natural evidentiary infrastructure through which a producer demonstrates eligibility for a lower fee tier. Where eco-modulation criteria track ESPR Annex I parameters, and the DPP is the instrument through which those same parameters must be disclosed in structured, verifiable, machine-readable form, a producer lacking populated, accurate DPP data for a given product would have materially weaker grounds to claim a favourable fee tier than one who can produce it — meaning the DPP, once its own textile-specific delegated act applies, is likely to function in practice as the verification mechanism underpinning the EPR fee, even though the two instruments impose formally separate obligations. **Producer obligations under the WFD/EPR regime:**

- Registration (Article 22b): producers must register in a national producer registry before placing textile products on the market; the register is public and free to consult.
- Mandatory adhesion to a Producer Responsibility Organisation ("PRO") (Article 22c): producers must discharge their obligations through an authorised PRO rather than individually.
- Fee payment, calculated by weight and, where relevant, quantity, modulated as mentioned above; Member States may impose additional surcharges targeting fast and ultra-fast fashion business models.
- Non-discrimination by size: fees must not impose disproportionate burdens on SMEs, notwithstanding the later application to micro-enterprises (from 17 April 2029).

Interaction with the Digital Services Act and online marketplaces. As already established in Section 2.1.2, intermediaries such as online marketplaces and fulfilment-service providers will, under this regime, need to verify a producer's registration number before permitting a sale — a due-diligence obligation that maps directly onto the Digital Services Act's Article 30 "know your business customer" framework already analysed in this report's DSA section. The WFD/EPR registration requirement and the DSA's marketplace due-diligence obligation operate in tandem, not in isolation.

National transposition in the project countries. The three jurisdictions most relevant to LIFE DPP-TEX are at different stages in implementing the textile EPR rules of Directive (EU) 2025/1892, whose transposition deadline is 17 June 2027:

- **The Netherlands:** the textile EPR scheme operates within a general national framework for extended producer responsibility. The Besluit regeling voor uitgebreide producentenverantwoordelijkheid (Stb. 2020, 375) implements Article 8a of the Waste Framework Directive. It sets the minimum requirements that apply to all Dutch EPR schemes, including the allocation of roles, cost coverage and information obligations. The Besluit uitgebreide producentenverantwoordelijkheid textiel (Stb. 2023, 132) applies this framework to textiles and

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refers expressly to the general decree in its Article 2, so both instruments must be read together when assessing producers' obligations under the Dutch textile scheme.

- **Spain:** the Ministry for the Ecological Transition (MITECO) held a public consultation from 1 July to 4 September 2025 on a draft Royal Decree regulating textile and footwear products and the management of their waste. The draft develops Ley 7/2022, and its Annex I transposes Annex IVc of the Directive. The Royal Decree had not been adopted at the date of this report.
- **Bulgaria:** the Waste Management Act has provided for extended producer responsibility for textile and footwear waste since 2021, but the implementing ordinance needed to apply it in practice has not yet been adopted. According to the Ministry of Environment and Water, a weight-based product fee for textiles and footwear will be introduced, and the related legislative amendment has been submitted to the National Assembly.

With the transposition deadline about eight months away, national developments in all three countries will be monitored closely. Their national schemes are unlikely to be identical. The Directive harmonises the registration format and the criteria for modulating fees by reference to ESPR ecodesign requirements (Articles 22b(10) and 22c(5)(a) and (7)), but it leaves fee levels, the design of collection networks and many operational details to national law.

In conclusion, WFD/EPR regime and the DPP are legally distinct but economically interdependent: the destruction ban addressed elsewhere in this report intervenes at the pre-consumer, commercial stage; the EPR scheme intervenes at the post-consumer, end-of-life stage; and the DPP, once its textile-specific delegated act applies, is the data layer that connects both to the underlying ESPR ecodesign criteria — with the practical result that a textile SME's investment in accurate, complete DPP data is likely to directly reduce its future EPR fee exposure, not merely satisfy a separate disclosure obligation.

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DIGITAL PRODUCT PASSPORT FOR TEXTILE CIRCULARITY AND TRACEABILITY

Regulatory architecture of the textile DPP

How EU and national law connect to the textile DPP: core framework, express legal links and functional links

LIFE DPP-TEX
DIGITAL PRODUCT PASSPORT
FOR TEXTILE CIRCULARITY AND TRACEABILITY



C. FUNCTIONAL LINKS (data or evidence overlap, no textual cross-reference)

C1 · Product information & consumer law
Textile Labelling Reg. · Accessibility Act · Empowering Consumers Dir. · Right to Repair Dir. · PPWR

C2 · Digital & data
Digital Services Act · Data Act · AI Act

C3 · Reporting & due diligence
ESRS · CSDDD · Omnibus I (Dir. (EU) 2026/470)

C4 · Supply-chain restrictions
Deforestation Reg. (EUDR) · Forced Labour Reg.

C5 · Raw materials & trade
Critical Raw Materials Act · CBAM

NATIONAL IMPLEMENTATION (as of 26 October 2026)

Spain
Ley 7/2022 (waste) · draft Royal Decree on textile and footwear products · Ley 11/2023 (accessibility) · Empowering Consumers, Right to Repair and CSRD transposition pending

Bulgaria
Waste Management Act (SG 53/2012; textile EPR basis since 2021) · implementing ordinance and product fee pending · CSRD (2024) and Empowering Consumers (SG 87/2026) transposed

Netherlands
Besluit UPV Textiel (Stb. 2023, 132; covers workwear) · Empowering Consumers transposed (Stb. 2026, 152) · Right to Repair and CSRD pending

A. Core framework — B. Express legal link — C. Functional link

Status as of 26 October 2026 (D2.1). Full references: Annex III, "Overview of the main EU legislation cited in this report".

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3. Implications for LIFE DPP-TEX

3.1 Purpose and scope

The regulatory framework analysed in this report bears directly on LIFE DPP-TEX, whose purpose is to develop and test a Digital Product Passport for textile circularity and traceability ahead of binding EU requirements. This section turns that analysis into practical guidance for the consortium. It sets out:

- the data the DPP should be designed to hold;
- the governance and compliance mechanisms the architecture should support;
- what the JRC preparatory work implies for the pilots;
- the practical consequences for each work package;
- the developments to monitor until M30.

As the initial regulatory analysis, D2.1 does not define the final technical data model, the pilot data-collection templates or the operational workflows. These will be developed in WP3, the WP4 and WP5 pilots, WP7 and the regular technical coordination meetings. This section provides the legal basis for those activities, so that design and pilot choices made now remain compatible with the framework as it develops. Content that depends on the future textile delegated act is presented as anticipatory throughout.

Moreover, and to support the practical use of this analysis, Terraqui has developed an interactive DPP compliance checklist for the consortium and operators in general. The checklist turns the requirements identified in the present report into 91 verifiable actions. The **"DPP Compliance checklist tool"** can be found in the Annex II.

3.2 From legal requirements to DPP design

Table 43 below translates the main legal requirements into elements of the DPP architecture. The textile delegated act will fix the final list of data fields. The elements below are those the ESPR framework, the harmonised standards and related legislation already make foreseeable, so designing for them now limits later rework. Moreover, where the JRC preparatory work indicates how a requirement is likely to be applied to textiles, the entry is marked "anticipated (JRC)" and should be only considered as anticipatory.

Requirement area	What the DPP should hold or do	Governance or compliance mechanism	Legal basis and source	WP
Identification	Unique product, operator and facility identifiers; commodity (CN/TARIC) code; importer EORI	Choose identifier granularity early. Plan for batch-level identifiers carrying model-level data (anticipated, JRC). GS1 GTIN and GLN are the most common industry references	Annex III(b)–(d), (g)–(j) and Art. 12 ESPR; EN 18219; JRC, 2026a, s. 5.2.1	WP3, WP4, WP5
Responsible operator	Name and contact details of the operator responsible in the EU	Identify the responsible operator for each pilot product flow	Annex III(k) ESPR; Art. 4 Reg. (EU) 2019/1020; Art. 15 Reg. (EU) 2023/988	WP3, WP4, WP5

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Composition and labelling data	Fibre composition; non-textile parts of animal origin. Likely future fields: composition of non-textile parts, care instructions, origin and size (anticipated, JRC)	Reuse existing physical-label data. Structure fields so that digital-label content from the revised Textile Labelling Regulation can be added	Arts 9 and 12 Reg. (EU) No 1007/2011; JRC, 2026a, s. 5.1	WP3, WP4, WP5
Recycled content	Recycled and renewable content; certificate references; origin of recycled material where available	Store chain-of-custody certificates (e.g. GRS, RCS) at model or batch level. Traceable origin may matter for EPR fee modulation	Annex I(h)–(i) ESPR; Art. 22c(5)(a) WFD; JRC, 2026a, s. 5.2.1	WP4, WP5, WP7
Substances of concern	Substance identity, location, concentration, safe-use and end-of-life information	Collect safety data sheets and REACH Art. 33 information; assess the 0.1% threshold per component (Case C-106/14). Concentration and location data are currently scarce (JRC)	Arts 2(27) and 7(5) ESPR; REACH; CLP; JRC, 2026a, s. 5.2.1	WP3, WP4, WP5
Durability and robustness	Durability information; robustness test results	Keep ISO-based test reports in structured form, not only as PDFs, linked to the relevant batch or model	Art. 7(2)(b)(i) and Annex I(a) ESPR; JRC, 2026a, s. 5.2.1	WP4, WP5
Repair, reuse and end of life	Care and repair information; disassembly instructions; components that hinder recycling	Record construction, trims and transformation steps during sorting, reuse and upcycling	Art. 7(2)(b)(ii)–(iii) and Annex I(b), (d) ESPR	WP4, WP5
Weight	Weight per product, which varies by size within a model	Capture weight per size variant, since EPR fees are calculated by weight	Annex I(j) ESPR; Art. 22c(5)(a) WFD; JRC, 2026a, s. 5.2.3	WP4, WP5, WP7

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Environmental footprint	Carbon, environmental and material footprint	Calculate at model level (anticipated, JRC) with a method compatible with the PEF method referred to in the ESPR. The PEFCR for Apparel and Footwear v3.1 is a non-binding methodology; the delegated act will set the binding method	Art. 2(24), Annex I(m)–(o) and Recital 23 ESPR; Recommendation (EU) 2021/2279; JRC, 2026a, s. 5.2.1	WP7
Consumer information and claims	Legal guarantee notice; commercial durability guarantee and after-sales conditions where offered; evidence behind environmental claims	Hold guarantee information alongside product data. Link any public environmental claim to verifiable DPP or pilot data	Directive (EU) 2024/825 (applies since 27 Sep 2026); JRC, 2026a, s. 5.1	WP3, WP6, WP7
Access and confidentiality	Separate access levels for public, commercially confidential and authority-only data	Classify each pilot data field by access level before configuring the platform	Arts 9(2)(f)–(g) and 11(b) ESPR; FprEN 18239 (pending)	WP3
Updates and versioning	Update log; previous versions; update triggers such as repair, change of ownership and end-of-life treatment	Define who updates which fields and when; record timestamps and responsible actors	Arts 9(2)(g)–(h) and 11 ESPR; JRC, 2026a, s. 2.1.4.3	WP3, WP5
Personal data	No personal data in the DPP without explicit consent	Design out personal data where possible; sign a processing agreement with the hosting provider	Art. 10(1)(e) ESPR; Arts 6 and 28 GDPR	WP3
Data carrier and interoperability	A durable carrier (QR code, Data Matrix, RFID or NFC) linked to the identifier; structured, machine-readable data mapped to recognised vocabularies	Test carriers on the actual label substrate. Using RFID or NFC does not take a garment out of scope (JRC). Conformity with cited standards gives a presumption of conformity	Art. 10 ESPR; EN 18216, 18220, 18223; Art. 41(2) ESPR; JRC, 2026a, s. 4.3	WP3

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Hosting, persistence and Registry	Back-up copy; long-term availability; registration in the DPP Registry	Agree written continuity arrangements; prepare for certification of service providers	Arts 10.4, 11, 13 and Annex III(l) ESPR; EN 18221, 18222; forthcoming delegated act on service providers	WP3
Online sales and EPR	Digital copy of the data carrier for marketplaces; consistent operator identifiers across the DPP and the EPR register	No legal link exists between the two registers; using the same identifiers in both is recommended	Art. 10(3) ESPR; Art. 30 DSA; Arts 22a(13) and 22b WFD	WP3, WP6
EPR status of reused and upcycled products	A flag identifying products placed on the market as second-hand, or derived from used or waste textiles (reuse, repair, upcycling), with a link to the original product's DPP where available	Operators placing such products on the market are not "producers" for EPR purposes, so no EPR fee applies to them. Record the product's origin and transformation steps to evidence this status. Bulgaria already applies an equivalent exemption for second-hand textiles and footwear	Art. 3(4b) WFD and Recital 22 of Directive (EU) 2025/1892; Art. 14(15) ЗУО (Bulgaria, ДВ бр. 19/2021)	WP3, WP4, WP5
Unsold products	Records supporting any use of the destruction-ban derogations	Check whether pilot products are "consumer products"; professional workwear may fall outside the ban	Arts 24–25 ESPR; Delegated Reg. (EU) 2026/296	WP5
Enforcement	Records demonstrating conformity, available on request	Market surveillance authorities designated under Reg. (EU) 2019/1020 enforce the ESPR. Member States must provide penalties including at least fines and time-limited exclusion from public procurement	Arts 66, 67 and 74 ESPR	All

Table 43. Legal requirements translated into DPP design elements.

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3.3 What the JRC preparatory work means for the project

The JRC's May 2026 study on DPP content for textile apparel[86] is the most detailed official indication yet of what the textile delegated act will contain. It still requires stakeholder validation and an impact assessment, so its findings are anticipatory.

JRC proposal (anticipated)	Practical implication for LIFE DPP-TEX	WP
Scope. Textile apparel only: at least 80% textile fibres by weight, ten categories. Workwear is included; PPE, smart/e-textiles, medical devices and toys are excluded. Upcycled and customised apparel are left to the impact assessment. Intermediate products (fabrics, yarns, fibres) are excluded (s. 4.1–4.3)	Home textiles (Bulgarian pilot) fall outside the apparel act, so their DPP would be voluntary or anticipate a later act. Workwear products included in the Spanish pilot require a prior PPE/non-PPE assessment and classification. Recycled fibres feed final-product DPPs but are not themselves covered	WP4, WP5, WP7
Four data categories. Product identification and classification; producer information; product characteristics; compliance documentation. Each data point comes with a reference methodology and a data type (s. 7, Tables 5–8).	Use this four-block structure and the proposed data types as the skeleton of the WP3 data model	WP3
Identifiers. Model ID: GTIN-13. Batch ID: GTIN + lot number. Unique item ID: SGTIN, voluntary unless finer granularity is chosen. All compliant with prEN 18219. Classification: ESPR category (knitted, woven, denim), PEFCR category, HS (6-digit) and TARIC (10-digit) codes (Table 5)	Adopt GS1 identifiers (GTIN, GTIN + lot, optionally SGTIN) in the platform. Assign each pilot product an ESPR and a PEFCR category	WP3, WP4, WP5
Operators and facilities. Manufacturer and importer identified by Party GLN plus EORI where available. Other responsible operators under Annex III(k). Facility identified by GLN. All held at **batch** level, since the facility or importer can differ within one model (Tables 6, 13)	Record the manufacturer, importer and facility for each pilot batch, not only per model	WP3, WP4, WP5
Product information data points: fibre composition; robustness score; substances of concern (identity, location, concentration, safe use, end-of-life information); recyclability score; recycled content (%, ISO 14021-based); origin of recycled content (post-industrial, pre-consumer or post-consumer); carbon/environmental footprint class of performance (PEFCR-based); care instructions (TLR / ISO 21600); warranty duration. **Voluntary:** organic content, EU Ecolabel, repair instructions, contact for repair services, component	Use this list as the baseline field list for pilot data collection. ISO 14021 and ESPR define "post-consumer" differently, so record waste origin using the ESPR terms (s. 7.3, fn. 45)	WP3, WP4, WP5, WP7

[86] JRC (2026a).

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specification (Table 7)		
Voluntary entries. Allowed, but sustainability-related voluntary data only if the delegated act defines it, to prevent greenwashing (s. 7)	Do not add unregulated sustainability claims as DPP fields. Keep project-specific indicators outside the regulated DPP or clearly flagged	WP3, WP6, WP7
Compliance documentation. Two verification routes: third-party certification, or self-declaration with calculation parameters that authorities can recalculate. Test results ISO 15487, ISO 16322-3 and ISO 3759; weight excluding trims; amount of recycled material; footprint as an absolute value and compared with the PEFCR benchmark (s. 7.4, Table 8)	Keep test reports and calculation inputs in structured form so that either route remains possible	WP4, WP5, WP7
Definitions. "Model": same technical characteristics, pattern and construction; colour and size do not have to differ. "Batch": same plant, time, conditions, materials and processes; inputs may come from different material lots (s. 9.1)	Adopt these definitions for the consortium's working definition of "batch"	WP3, WP4, WP5
Granularity. Batch identifiers as the minimum. Item-level identifiers voluntary and under analysis, under an inheritance model. Per field: composition, recyclability score and footprint at model level; operators, facility and substances of concern at batch level, with substances disclosed as a worst case across all colours in the batch; recycled content stated at model level but verified at batch level; test results at batch level (self-declaration) or model level (third-party certification) (s. 9.1, Table 13)	Build the data model as model → batch → optional item, with inheritance. Pilots should collect chemical data per batch, covering all colourways	WP3, WP4, WP5
Online sales. At the offer stage, marketplaces may show model-level data or a representative batch DPP. The full DPP becomes available once a physical item is assigned to the order (s. 9.1; Art. 9(2)(e) ESPR)	Provide a model-level public view for e-commerce channels	WP3, WP6
Access rights, three tiers: public; authorities only (notified bodies, market surveillance authorities, customs, Commission); legitimate interest (e.g. recyclers). Public consumer information at model level, except substances of concern. Examples: operator contact is authority-only; location of substances of concern and end-of-life disassembly information are legitimate interest; conformity certificates are authority-only; absolute footprint values and calculation parameters are legitimate interest or authority-only (s. 9.2, Table 14)	Configure the platform's three access tiers using Table 14 as the starting classification for each pilot field. Recyclers (e.g. TexCycle) would get legitimate-interest access	WP3, WP4

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Governance: the manufacturer (or the importer, for non-EU manufacturers) creates and maintains the DPP. If several importers bring in the same product, the DPP is uploaded once. The importer acts as data custodian, with liability shared with the manufacturer. An operator who modifies a product (e.g. printing, embroidery) and places it on the market becomes the manufacturer: it inherits valid upstream data and declares changes, such as new substances. Repurposed or remanufactured products may need a new DPP linked to the original. Market surveillance authorities and customs may append inspection results (s. 9.3.1–9.3.2)	**Directly relevant to WP5 upcycling and reuse.** ALSICO and EIG may become "manufacturers" for transformed garments, so the platform needs links between upstream and downstream DPPs and a way to record which data was inherited and which newly declared	WP3, WP5
Storage and verification. Hybrid model: the Registry holds identifiers and metadata; content is stored decentrally by the operator or a service provider. The JRC states a minimum availability of ten years unless the delegated act provides otherwise. Three verification types: direct testing; indirect, chain-of-custody-based (recycled or organic content, footprint); identifier checks (s. 9.3.2–9.3.4)	Plan hosting and continuity for at least ten years.[87] Rely on contracts and certification schemes for upstream evidence	WP3, WP4
Vocabulary. The Commission should create and own the textile DPP dictionary, building on CEON, UNECE, circularity.ID, TRICK/eBIZ, GS1 Web Vocabulary and CPDP (s. 8)	Map platform fields to these vocabularies now, to ease alignment with the future Commission dictionary	WP3

Table 44. JRC proposals (anticipated) for the textile DPP and their practical implications.

3.4 Practical implications by work package

Table 45 turns the design elements in Table 43 and the JRC findings in Table 44 into concrete actions for each work package. For each WP it sets out what this report clarifies and what the responsible partners should do in practice, from building the DPP data model in WP3 to pilot data collection in WP4 and WP5 and the impact and replication work in WP7. Partners can use it as a quick reference to the regulatory points that matter most for their own tasks, alongside the watch points in Table 46.

WP	What D2.1 clarifies	Practical implication for partners
WP2 — Policy alignment, compliance and interoperability framework	Which EU and national rules apply to textile DPPs, circularity, EPR, data access and future compliance.	Terraqui maintains the regulatory watch until M30 and alerts the consortium when a development affects data fields, pilot obligations, EPR links, access rights or compliance assumptions.
WP3 — DPP system, interoperability and deployment	Which requirements shape identifiers, access levels, carriers, interoperability, persistence, updating and	Blue Room builds the data model on Tables 1 and 2, using a three-layer granularity model, an access-level classification and update logging. The platform should align with the harmonised

[87] The JRC says the DPP must remain available for "at least ten years" unless the delegated act provides otherwise, but Art. 9.2 (i) ESPR only refers to the product's expected lifetime.

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	the Registry.	standards and the forthcoming rules for service providers.
WP4 — Bulgarian pilot	What the framework means for recycling, recycled-content products and home-textile manufacturing.	TexCycle and Kalinel collect composition, weight, recycled-content certificates and substance information. They treat the home-textile DPP as anticipatory, since it falls outside the apparel act, and follow Bulgaria's textile EPR ordinance and product fee. Under Bulgarian law, persons placing second-hand textiles and footwear on the market are already exempt from EPR (Art. 14(15) 3YO), a position the harmonised EU regime confirms for reused and upcycled products (Art. 3(4b) WFD).
WP5 — Spanish pilot	What the framework means for returned workwear, sorting, reuse, upcycling and recycling.	ALSICO and EIG classify the workwear as PPE or non-PPE, record classification criteria and transformation steps, and follow Spain's draft Royal Decree and the scope of the destruction ban. The Dutch scheme, which already covers workwear, is a reference point. Real Decreto 234/2013 is directly relevant to the Spanish pilot: public bodies purchasing workwear are required to take the EU Ecolabel criteria into account in their tendering, which strengthens the case for workwear supported by verifiable Ecolabel-compliant data, such as the information a textile DPP is designed to carry. Operators placing reused or upcycled workwear on the market are not 'producers' under the textile EPR regime (Art. 3(4b) WFD), so the pilot should document the origin and transformation of such products.
WP6 — Communication, dissemination and stakeholder engagement	D2.1 is public and can support outreach on the regulatory findings.	Tèxtils.CAT disseminates key findings to clusters and SMEs. Since 27 September 2026, generic environmental claims and self-created sustainability labels have been restricted under Directive (EU) 2024/825, so public claims must be substantiated.
WP7 — Impact, sustainability, replication and exploitation	Which requirements affect LCA evidence, circularity indicators, policy recommendations and replication.	bAwear, Blue Room and Terraqui align the LCA with the PEF method and the PEFCR approach, link impact claims to traceable pilot data, and draw on the scoping findings (apparel versus home textiles, PPE, upcycling) in replication

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		work and policy recommendations.

Table 45. Practical regulatory implications by work package.

3.5 Regulatory watch points

Several regulatory developments relevant to LIFE DPP-TEX were still in progress at the time of writing and may affect the design, testing and future applicability of the project's DPP solution. Table 46 lists these developments, explains why each matters for the project, and records its status as of 26 October 2026, the delivery date of this report (D2.1). For each item, it also assigns monitoring responsibility and indicates when the item should be reviewed. The table is the baseline for the regulatory watch that WP2 will maintain until M30. Relevant updates will be reported to the consortium as they occur and consolidated in the later WP2 deliverables.

Topic	Why it matters	Status at the date of this report	Main responsible	Timeframe
ESPR textile delegated act	Will set textile DPP scope, data fields, access rights and application dates	JRC DPP content study published in May 2026; final milestone of the preparatory study expected end 2026; adoption indicatively 2027	Terraqui, with Blue Room	Continuous until M30
Validation of the JRC proposals	Scope (apparel only, PPE exclusion, upcycled products) and granularity may change	Subject to stakeholder consultation and impact assessment	Terraqui	Review at each JRC or Commission publication
DPP Registry and EU web portal	Identifiers, registration data and public access	Operational rules set by Implementing Regulation (EU) 2026/1778, in force 6 August 2026. The Registry was reportedly opened on 20 July 2026, with a separate testing environment.	Terraqui and Blue Room	M4–M30
Harmonised DPP standards	Carriers, identifiers, interoperability, persistence	Six standards cited on 15 Jul 2026 (Decision (EU) 2026/1736); FprEN 18239 and 18246 pending	Terraqui (relevance); Blue Room (implementation)	M4–M30; mapping aligned with D2.3
Delegated act on DPP service providers	Who may lawfully host DPP data	In preparation; indicatively 2027	Terraqui and Blue Room	Before hosting decisions are finalised

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Textile EPR in Spain, Bulgaria and the Netherlands	Registration, reporting and circularity evidence for pilot operators	Spain: draft Royal Decree. Bulgaria: draft ordinance and product fee. The Netherlands: Besluit UPV Textiel in force, amendment in preparation. EU deadlines: transposition 17 Jun 2027; schemes operational 17 Apr 2028	Terraqui, with ALSICO, EIG, TexCycle, Kalinel and bAwear	M4–M30; before pilot reporting
EPR implementing acts	Registration format and ESPR-based fee modulation	Registration format due by 17 Apr 2027; modulation criteria (Art. 22c(7) WFD) not yet scheduled	Terraqui and Blue Room	Review at adoption
Destruction ban on unsold products	Handling of returned or unsold stock	Applies to large enterprises since 19 Jul 2026 and to medium-sized enterprises from 19 Jul 2030; derogations in Delegated Reg. (EU) 2026/296	Terraqui, with ALSICO and EIG	Before WP5 decisions on unsold stock
Textile Labelling Regulation revision	Care, origin, size and non-textile composition may move to a digital label on the DPP; Expected to bring fibre-composition labelling and other sustainability and circularity parameters into line with the DPP	Revision under consideration; proposal not yet published. It is expected that the following information has to be added: **Expanded Label Categories:** Moving beyond strict fibre-only disclosure to potentially incorporate standardized sizing, care instructions (language-independent symbols), manufacturing origin ("made in"), and environmental/circularity metrics	Terraqui and Blue Room	Continuous

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Green claims and consumer information	How recycled content, circularity and environmental impacts may be communicated	Directive (EU) 2024/825 applies since 27 Sep 2026. The Netherlands: transposed (Stb. 2026, 152); ACM guidance on sustainability claims being updated. Spain: transposition pending, infringement procedure opened May 2026. Bulgaria: transposed (ДВ, бр. 87/2026). Green Claims Directive proposal (COM(2023) 166): trilogues suspended since June 2025, not formally withdrawn; classified as "blocked" in the EP Legislative Train	Terraqui, Tèxtils.CAT and bAwear	Before major public outputs
Data governance and confidentiality	Which data is public, restricted or internal	FprEN 18239 pending; Digital Omnibus proposal under negotiation	Terraqui and Blue Room	M4–M16 for design; then as needed
LCA, PEF and impact substantiation	How environmental benefits are calculated and presented	The ESPR refers to the PEF method (Recommendation (EU) 2021/2279) for environmental footprints, alongside other recognised methods (Art. 2(24) and Recital 23 ESPR). The PEFCR for Apparel and Footwear v3.1 was approved by the Commission in 2025 as a non-binding methodology; its legal role depends on the textile delegated act. The JRC indicates model-level calculation	bAwear and Terraqui	M4–M30, especially before D7.5 and D7.6

Table 46. Regulatory watch points.

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3.6 Next steps

- **Regulatory updates and monitoring.** Terraqui will report relevant developments at the technical coordination meetings and circulates written updates when a change affects data fields, pilot obligations or compliance assumptions.
- **Working definitions.** Before pilot data collection starts, the consortium agrees a common definition of "batch" and a first classification of each data field by access level.
- **Pilot scoping checks.** WP4 confirms how the home-textile DPP will be positioned, and WP5 confirms the PPE status of the workwear in scope.
- **Feedback from partners.** Partners notify WP2 of any regulatory question arising from data collection, platform design, or impact work.
- **Consolidation.** Tables 43 to 46 are working tools. They will be revised when the textile delegated act and the remaining JRC findings are confirmed and consolidated in the later WP2 deliverables.

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DPP compliance roadmap for textiles

Key EU milestones at a glance: what has happened and what comes next

1. Framework in place · 2024–2026

18 Jul 2024 ● **ESPR enters into force**
The Digital Product Passport becomes part of EU law.

15 Jul 2026 ● **DPP technical standards cited**
Six EN standards define how a DPP is built.

19 Jul 2026 ● **Ban on destroying unsold goods**
Large companies may no longer destroy unsold clothing and footwear.

20 Jul 2026 ● **DPP Registry launched**
The Commission opens the EU Registry and a testing environment.

27 Sep 2026 ● **Stricter green claims**
Generic claims such as “eco-friendly” are banned without recognised proof.

D2.1 · 26 Oct 2026

2. Textile rules adopted · 2027

2027 indicative ○ **Textile delegated act adopted**
Sets the textile DPP data, access rights and dates.

17 Jun 2027 ● **National EPR laws due**
Countries adopt textile producer-responsibility rules.

3. Obligations apply · 2028–2030

17 Apr 2028 ● **Textile EPR schemes start**
Producers register and pay fees for textile waste.

2028–2029 indicative ○ **Textile DPP becomes mandatory**
At least 18 months after the delegated act.

19 Jul 2030 ● **Ban extends to medium firms**
Medium-sized companies are also covered.

● Fixed date ○ Indicative date (may change)

Status as of 26 October 2026 (D2.1). Indicative dates follow the ESPR Working Plan 2025–2030 and may change. Sources: Sections 2 and 3 of this report.

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4. Conclusions and points of attention

4.1 Main conclusions

This report has mapped the legal and policy framework within which **LIFE DPP-TEX** will develop and test its **Digital Product Passport for textiles.** Its central finding is that the regulatory architecture of the DPP is already in place, but the obligations specific to textiles are not. The Ecodesign for Sustainable Products Regulation (Regulation (EU) 2024/1781) has been in force since 18 July 2024 and sets the horizontal rules for the passport: its content categories, data carrier, access rights, persistence and registration. Since then, several elements of the infrastructure have taken effect:

- six harmonised DPP standards were cited in the Official Journal on 15 July 2026 (Implementing Decision (EU) 2026/1736);
- the DPP Registry (Article 13 ESPR) was adopted on 16 July 2026; launched on 20 July 2026, with its implementation rules laid down in Implementing Regulation (EU) 2026/1778 of 16 July 2026 (in force since 6 August 2026)
- the ban on destroying unsold apparel and footwear has applied to large enterprises since 19 July 2026.

The textile DPP itself becomes mandatory only through a product-specific delegated act. That act is indicatively expected in 2027, and its requirements will apply, as a general rule, no earlier than 18 months after its entry into force (Art. 4.4 ESPR).

Second, the DPP does not operate in isolation. It connects a wide body of EU and national law, in two distinct ways:

- **Express legal links.** Some instruments are tied to the DPP by express legal provisions, for instance:
  - REACH and CLP define what counts as a "substance of concern" (Art. 2 (27) ESPR);
  - the Market Surveillance Regulation and the General Product Safety Regulation determine the responsible operator named in the passport (Annex III (k) ESPR);
  - the amended Waste Framework Directive links textile EPR fees to ESPR ecodesign criteria (Art. 22c(5)(a) WFD);
  - the GDPR governs any personal data held in the passport (Art. 10(1)(e) ESPR).
- **Functional links.** Others overlap with the DPP in data or evidence without any textual cross-reference. Examples are the Empowering Consumers Directive, the Data Act, the CSDDD, the EUDR and the Forced Labour Regulation.

For textile operators, the practical consequence is that a single, well-structured product data set can support compliance with several regimes at once.

Third, the **JRC preparatory work** gives a concrete, though still anticipatory, indication of what the textile delegated act may contain. It proposes:

- a scope limited to textile apparel;
- batch-level identification as the minimum;
- three access tiers (public, authorities and legitimate interest);
- rules for products that are transformed, repaired or reused.

These proposals still require stakeholder validation and an impact assessment, but they already provide a sound basis for design choices in WP3 and for data collection in the pilots (in Bulgaria and Spain, WP4 and WP5, respectively).

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Finally, national implementation is uneven across the three jurisdictions analysed:

- **The Netherlands** has operated a textile EPR scheme since 2023 and has transposed the Empowering Consumers Directive.
- **Bulgaria** has transposed the CSRD and the Empowering Consumers Directive, and has had a statutory basis for textile EPR since 2021, although the implementing ordinance remains in draft.
- **Spain** has a draft Royal Decree on textile and footwear products, while transposition of the CSRD and the Empowering Consumers Directive is still pending.

All three must transpose the textile EPR rules by 17 June 2027 and have schemes operating by 17 April 2028. This divergence will shape the operating conditions of the pilots and the replication potential of the project's results.

Implications for LIFE DPP-TEX. Section 3 of the present report translated this analysis into practical guidance for the project, and its main message is that the consortium can already design for most of the requirements ahead. Table 43 converts the legal requirements into concrete elements of the DPP architecture:

- unique product, operator and facility identifiers;
- composition and recycled-content data;
- substances of concern;
- access levels, update rules, data carriers and hosting arrangements.

Table 44 sets out what the JRC preparatory work implies for the pilots. In particular:

- the Bulgarian pilot's home textiles would fall outside the proposed apparel act;
- workwear in the Spanish pilot must be classified as PPE or non-PPE;
- transformed and upcycled products are likely to need linked passports.

These findings give each work package a defined role:

- **WP3** builds a data model with model, batch and optional item levels, three access tiers and update logging, in line with the harmonised standards.
- **WP4 and WP5** collect pilot data on weight, composition, recycled-content evidence and substances, structured so that it can serve both the DPP and future EPR obligations.
- **WP7** aligns its life-cycle assessment with the PEF method and links impact claims to traceable pilot data.
- **WP2** maintains the regulatory watch set out in Table 46 until M30.

The **DPP compliance checklist,** the **compliance roadmap** and the **legal architecture diagram** turn these implications into shared working tools for the consortium. The points of attention below highlight the issues within this framework that call for decisions or close monitoring during implementation.

4.2 Points of attention

The following points require particular attention from the consortium during project implementation:

1. **Anticipatory nature of textile-specific content.** The JRC proposals and the indicative timeline of the delegated act may change. Design decisions based on them should be documented as provisional and reviewed when the act is adopted (expected for 2027).
2. **Scope of the pilots.**

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- **Bulgarian pilot:** its home textiles and recycled fibres would fall outside the proposed apparel act. Its DPP should therefore be presented as a voluntary, forward-looking demonstration.
- **Spanish pilot:** its workwear should be classified as PPE or non-PPE. The treatment of upcycled products remains open.

3. **Granularity and definitions.** The consortium should agree early on a common definition of "batch" and on a data model with model, batch and optional item levels, as these choices shape the whole DPP architecture.
4. **Data availability.** Operators across the sector cannot yet reliably obtain the concentration and location of substances of concern, or detailed information on the origin of recycled content. Pilots should record the data they can obtain and document the gaps.
5. **Environmental footprint.** The ESPR refers to the PEF method, alongside other recognised methods (Art. 2 (24) ESPR). The PEFCR for Apparel and Footwear is a non-binding methodology, whose legal role depends on the delegated act. WP7 should stay aligned with it without treating it as a legal requirement.
6. **Access rights and confidentiality.** Each data field should be classified by access level before the platform is configured, pending citation of FprEN 18239.
7. **Hosting and service providers.** Hosting choices must allow for:
   - the back-up copy to be made through a DPP service provider (Art. 10.4 ESPR);
   - long-term availability of the passport;
   - the forthcoming rules on certification of DPP service providers.
8. **The link between EPR and the DPP.** EPR fees will be modulated on ESPR ecodesign criteria, but national criteria are likely to apply in the meantime. Weight data, recycled-content evidence and consistent operator identifiers across the DPP and the EPR registers should be captured from the outset.
9. **Transformed and reused products.** An operator that transforms a product and places it on the market may take on the manufacturer's DPP responsibilities. The platform should therefore support linked passports and distinguish inherited data from newly declared data. This is directly relevant to the Spanish pilot.
10. **Environmental claims.** Since 27 September 2026, generic environmental claims and self-created sustainability labels have been restricted under Directive (EU) 2024/825. Project communication on recycled content, circularity or impacts must be substantiated. The Green Claims Directive proposal remains pending, with negotiations suspended (not formally withdrawn).
11. **Regulatory volatility and open verification points.** Besides the delegated act for textiles, several relevant initiatives and a limited number of items identified in this report are still evolving and should be monitored and accordingly updated in forthcoming deliverables, as they may affect the project before M30. Mainly:
    - the Circular Economy Act;
    - the revision of the Textile Labelling Regulation;
    - the Digital Omnibus;
    - the proposal to repeal the SCIP database;
    - the simplification of sustainability reporting rules.
    - the Official Journal citation of FprEN 18239 and FprEN 18246;
    - certain national transpositions.

4.3 Outlook

The practical implications identified in Section 3 will guide the project's design and pilot activities from the outset. This deliverable establishes the regulatory baseline for LIFE DPP-TEX as of 26 October 2026. The operational tools developed alongside it are designed to keep that baseline usable as the framework evolves:

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- the design tables and watch points in Section 3;
- the one-page compliance roadmap;
- the legal architecture diagram;
- the shared compliance checklist.

WP2 will maintain the regulatory watch until M30 and will report relevant developments to the consortium as they occur. It will consolidate the analysis in the later WP2 deliverables, in particular once the textile delegated act and the remaining JRC findings are confirmed. Designing the LIFE DPP-TEX solution now around the requirements that are already foreseeable positions the project not only to comply with future obligations, but also to inform their development through its pilot results.

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82. European Economic and Social Committee, *Opinion on the Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on a revised monitoring framework for the circular economy (COM(2023) 306 final)*, NAT/912, EESC-2023-03270, rapporteur C. Lohan, adopted 25 October 2023, CELEX 52023AE3270.

e. Guidance and internal Commission documents

83. European Commission, *Commission Notice – Guidelines on the application of the EU general product safety legislative framework by businesses*, OJ C, C/2025/6233, 21.11.2025 (CELEX 52025XC06233).
84. European Commission, *European Commission Digital Strategy: Next Generation Digital Commission*, C(2022) 4388 final, Brussels, 30 June 2022. *This is the Commission's internal digital-transformation strategy; the report found no substantive link to the DPP.*

f. National policy documents

85. Ministerie van Infrastructuur en Waterstaat, *Beleidsprogramma Circulair Textiel 2025–2030*, Rijksoverheid, The Hague, 2024 (published 4 December 2024).

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86. Министерски съвет на Република България (Council of Ministers of the Republic of Bulgaria), *Национален план за действие за насърчаване на зелените обществени поръчки за периода 2012–2014 г.* (National Action Plan for the Promotion of Green Public Procurement for the period 2012–2014), adopted by Protocol No 38.2 of the Council of Ministers of 13 October 2011, Sofia, 2011. *This plan has expired; it is cited only to document the gap identified in the report.*

II. National legislation

SPAIN

In force

1. Ley 7/2022, de 8 de abril, de residuos y suelos contaminados para una economía circular, BOE núm. 85, de 9 de abril de 2022.
2. Ley 11/2023, de 8 de mayo, de trasposición de Directivas de la Unión Europea en materia de accesibilidad de determinados productos y servicios [y otras materias], BOE núm. 110, de 9 de mayo de 2023.
3. Ley 11/2018, de 28 de diciembre, en materia de información no financiera y diversidad, BOE núm. 314, de 29 de diciembre de 2018.
4. Real Decreto 214/2025, de 18 de marzo, por el que se crea el registro de huella de carbono, compensación y proyectos de absorción de dióxido de carbono y por el que se establece la obligación del cálculo de la huella de carbono y de la elaboración y publicación de planes de reducción de emisiones de gases de efecto invernadero, «BOE» núm. 89, de 12 de abril de 2025 (BOE-A-2025-7439).
5. Real Decreto 234/2013, de 5 de abril, por el que se establecen normas para la aplicación del Reglamento (CE) n.º 66/2010 del Parlamento Europeo y del Consejo, de 25 de noviembre de 2009, relativo a la etiqueta ecológica de la Unión Europea, «BOE» núm. 97, de 23 de abril de 2013 (BOE-A-2013-4290).
6. Ley Orgánica 3/2018, de 5 de diciembre, de Protección de Datos Personales y garantía de los derechos digitales, BOE núm. 294, de 6 de diciembre de 2018.
7. Ley 9/2017, de 8 de noviembre, de Contratos del Sector Público, BOE núm. 272, de 9 de noviembre de 2017.
8. Ley 7/2021, de 20 de mayo, de cambio climático y transición energética, BOE núm. 121, de 21 de mayo de 2021.
9. Real Decreto Legislativo 1/2007, de 16 de noviembre, por el que se aprueba el texto refundido de la Ley General para la Defensa de los Consumidores y Usuarios, BOE núm. 287, de 30 de noviembre de 2007.
10. Ley 3/1991, de 10 de enero, de Competencia Desleal, BOE núm. 10, de 11 de enero de 1991.

In preparation

11. Proyecto de Real Decreto por el que se regulan los productos textiles y de calzado y la gestión de sus residuos (MITECO; public consultation closed September 2025).

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12. Anteproyecto de Ley de Consumo Sostenible (transposing Directives (EU) 2024/825 and (EU) 2024/1799).
13. Proyecto de Ley de Información Empresarial sobre Sostenibilidad (approved by the Consejo de Ministros on 29 October 2024).
14. Anteproyecto de Ley por el que se modifica la Ley 7/2022 (food-waste limb of Directive (EU) 2025/1892; consultation closed 3 September 2026).

BULGARIA

In force

15. Закон за управление на отпадъците (Waste Management Act), обн. ДВ, бр. 53 от 13.07.2012 г., as amended.
16. Закон за изискванията за достъпност на продукти и услуги (Act on Accessibility Requirements for Products and Services), обн. ДВ, бр. 31 от 11.04.2025 г.
17. Закон за счетоводството (Accounting Act), обн. ДВ, бр. 95 от 8.12.2015 г., в сила от 1.01.2016 г., as amended by Закон за изменение и допълнение на Закона за счетоводството, ДВ, бр. 72 от 27.08.2024 г., в сила от 6.07.2024 г. (transposing Directive (EU) 2022/2464).
18. Закон за независимия финансов одит и изразяването на сигурност по устойчивостта (Independent Financial Audit and Sustainability Assurance Act), обн. ДВ, бр. 95 от 29.11.2016 г.; title supplemented and the Act amended by Закон за изменение и допълнение на Закона за независимия финансов одит, ДВ, бр. 79 от 17.09.2024 г. (transposing the audit and assurance provisions of Directive (EU) 2022/2464).
19. Закон за ограничаване изменението на климата (Climate Change Mitigation Act), обн. ДВ, бр. 22 от 11.03.2014 г.
20. Закон за защита на личните данни (Personal Data Protection Act), обн. ДВ, бр. 1 от 04.01.2002 г., изм. ДВ, бр. 17 от 26.02.2019 г.
21. Закон за обществените поръчки (Public Procurement Act), обн. ДВ, бр. 13 от 16.02.2016 г.
22. Закон за защита на потребителите (Consumer Protection Act), обн. ДВ, бр. 99 от 09.12.2005 г.
23. Закон за предоставяне на цифрово съдържание и цифрови услуги и за продажба на стоки (Act on the Supply of Digital Content and Digital Services and the Sale of Goods), обн. ДВ, бр. 23 от 19.03.2021 г., в сила от 1.01.2022 г.

In preparation

24. Draft Наредба за отпадъците от обувки и текстил (Ordinance on Footwear and Textile Waste).
25. Ordinance setting a weight-based product fee for textiles and footwear (Ministry of Environment and Water; in preparation).
26. Bill amending Act No. 83 to transpose Directive (EU) 2024/1799 (before the National Assembly, first reading).

THE NETHERLANDS

In force

27. Wet milieubeheer (Environmental Management Act), BWBR0003245, as amended.

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28. Wet van 3 februari 2011 tot wijziging van de Wet milieubeheer, de Wet belastingen op milieugrondslag en de Wet op de economische delicten ten behoeve van de implementatie van richtlijn nr. 2008/98/EG van het Europees Parlement en de Raad van de Europese Unie van 19 november 2008 betreffende afvalstoffen en tot intrekking van een aantal richtlijnen (PbEU L 312) (Implementatiewet EG-kaderrichtlijn afvalstoffen), Stb. 2011, 103 (Kamerstukken 32 392; BWBR0029676).
29. Wet van 27 mei 2020 tot wijziging van de Wet milieubeheer ter implementatie van de wijziging van de EU-kaderrichtlijn afvalstoffen, Stb. 2020, 158.
30. Besluit uitgebreide producentenverantwoordelijkheid textiel (Besluit UPV Textiel), Stb. 2023, 132.
31. Besluit van 18 september 2020, houdende regels voor een regeling voor uitgebreide producentenverantwoordelijkheid voor het beheer van afvalstoffen (Besluit regeling **voor** uitgebreide producentenverantwoordelijkheid), Stb. 2020, 375 (BWBR0044197).
32. Wet van 8 april 2024 tot wijziging van diverse wetten ter implementatie van Richtlijn (EU) 2019/882 (Implementatiewet toegankelijkheidsvoorschriften producten en diensten), Stb. 2024, 87 (Kamerstukken 36 380; BWBR0049571); entered into force on 28 June 2025 (Stb. 2024, 341).
33. Aanbestedingswet 2012, Stb. 2012, 542.
34. Klimaatwet, Stb. 2019, 253.
35. Uitvoeringswet Algemene verordening gegevensbescherming, Stb. 2018, 144.
36. Verzamelwet gegevensbescherming, Stb. 2026, 154.

In preparation

37. Wet implementatie richtlijn duurzaamheidsrapportering (Kamerstukken 36 678), with the draft Implementatiebesluit richtlijn duurzaamheidsrapportering.
38. Wet van 27 mei 2026, Implementatiewet richtlijn betere duurzaamheidsinformatie voor consumenten, Stb. 2026, 152 (Kamerstukken 36 873).
39. Wet ter implementatie van Richtlijn 2024/1799 (regels ter bevordering van de reparatie van goederen) (Wetgevingskalender WGK028011).
40. Wetsvoorstel internationaal verantwoord ondernemen (transposition of Directive (EU) 2024/1760).
41. Amendment of the Besluit UPV Textiel to implement Directive (EU) 2025/1892 (Ministry of Infrastructure and Water Management; in preparation).

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List of abbreviations

Abbreviation	Definition
ACM	Autoriteit Consument & Markt (NL)
AI	Artificial Intelligence
API	Application Programming Interface
CBAM	Carbon Border Adjustment Mechanism
CE	Conformité Européenne (CE marking)
CEAP	Circular Economy Action Plan
CEN	European Committee for Standardization
CEN-CLC/JTC 24	Joint Technical Committee 24 of CEN and CENELEC on Digital Product Passport – Framework and System
CENELEC	European Committee for Electrotechnical Standardization
CIRPASS	Collaborative project on Digital Product Passports under Horizon Europe
CLP	Classification, Labelling and Packaging Regulation
CN	Combined Nomenclature
CRMA	Critical Raw Materials Act
CSDDD	Corporate Sustainability Due Diligence Directive
CSRD	Corporate Sustainability Reporting Directive
DG GROW	Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs
DoA	Description of the Action
DPP	Digital Product Passport
DSA	Digital Services Act
EAA	European Accessibility Act
ECGT	Empowering Consumers for the Green Transition Directive
ECHA	European Chemicals Agency
EESC	European Economic and Social Committee
EGD	European Green Deal

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EIF	Entry into force
EN	European Standard
EORI	Economic Operators Registration and Identification number
EPR	Extended Producer Responsibility
ESPR	Ecodesign for Sustainable Products Regulation
ESRS	European Sustainability Reporting Standards
ETSI	European Telecommunications Standards Institute
EU	European Union
EUDR	EU Deforestation Regulation
FLR	Forced Labour Regulation
FprEN	Final proposed draft European Standard
GDPR	General Data Protection Regulation
GHG	Greenhouse gas
GLN	Global Location Number
GPP	Green Public Procurement
GPSR	General Product Safety Regulation
GS1	Global Standards One
GTIN	Global Trade Item Number
HS	Harmonized System (commodity classification)
ICSMS	Information and Communication System for Market Surveillance
ISO	International Organization for Standardization
JRC	Joint Research Centre
LCA	Life Cycle Assessment
M/604	Commission standardisation request on digital product passports (C(2024) 5423)
MITECO	Ministerio para la Transición Ecológica y el Reto Demográfico (Spanish Ministry for the Ecological Transition and the Demographic Challenge)
MSR	Market Surveillance Regulation
NFRD	Non-Financial Reporting Directive
NIS2	Network and Information Security Directive 2

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NISO	National Waste Information System (Bulgaria)
NLF	New Legislative Framework
OJEU	Official Journal of the European Union
PEF	Product Environmental Footprint
PEFCR	Product Environmental Footprint Category Rules
PPE	Personal protective equipment
PPWR	Packaging and Packaging Waste Regulation
PRO	Producer Responsibility Organisation
REACH	Registration, Evaluation, Authorisation and Restriction of Chemicals
SCIP	Substances of Concern In articles as such or in complex objects (Products) database
SCRAP	Sistema colectivo de responsabilidad ampliada del productor (collective EPR compliance scheme, Spain)
SGTIN	Serialised Global Trade Item Number
SME	Small and medium-sized enterprise
SVHC	Substance of Very High Concern
TARIC	Integrated Tariff of the European Union
TLR	Textile Labelling Regulation
UCPD	Unfair Commercial Practices Directive
UPV	Uitgebreide producentenverantwoordelijkheid (Dutch extended producer responsibility)
VSME	Voluntary SME standard (sustainability reporting)
WFD	Waste Framework Directive
WP	Work Package

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Annexes

Annex I. DPP Timeline for textiles, 2019-2030

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DIGITAL PRODUCT PASSPORT FOR TEXTILE CIRCULARITY AND TRACEABILITY

DPP timeline for textiles, 2019–2030

Key EU regulatory milestones for the textile DPP, extended producer responsibility and adjacent legislation

LIFE DPP-TEX
DIGITAL PRODUCT PASSPORT
FOR TEXTILE CIRCULARITY AND TRACEABILITY

Confirmed date · Indicative, expected or pending · Status as of 26 October 2026 (D2.1)

D2.1 · 26 Oct 2026

	2019–2024	2025	Jan–Oct 2026	Nov–Dec 2026	2027	2028	2029	2030
ESPR and DPP	**11 Dec 2019** European Green Deal **11 Mar 2020** Circular Economy Action Plan introduces the DPP concept **30 Mar 2022** ESPR proposal and EU Textile Strategy **5 Dec 2023** Political agreement on the ESPR **18 Jul 2024** ESPR enters into force	**9 Apr 2025** Commission consultation on the DPP **16 Apr 2025** ESPR Working Plan 2025–2030: textiles a priority **Dec 2025** JRC textile preparatory study: 3rd milestone	**9 Feb 2026** Unsold-goods acts adopted (Reg. (EU) 2026/296 and 2026/2) **13 May 2026** JRC study on textile DPP content published **19 Jul 2026** Ban on destroying unsold apparel and footwear: large enterprises	*End 2026 · expected* JRC textile study: final milestone	*2027 · indicative* Textile ecodesign and DPP delegated act adopted *End 2027 · expected* Commission footwear study due	*2028–2029 · indicative* Textile DPP becomes mandatory (≥18 months after the act, Art. 4(4) ESPR)		**19 Jul 2030** Destruction ban extends to medium-sized enterprises
Standards and infrastructure			**27 May 2026** Six EN 18xxx DPP standards published **15 Jul 2026** Standards cited in OJ (Decision (EU) 2026/1736) **20 Jul 2026** DPP Registry launched (Art. 13 ESPR; Impl. Reg. (EU) 2026/1778)	*Pending* OJ citation of FprEN 18239 and FprEN 18246	*2027 · indicative* Delegated act on DPP service providers			
EPR (Waste Framework Directive)		**16 Oct 2025** Directive (EU) 2025/1892 enters into force			**17 Apr 2027** Harmonised EPR registration format (implementing act) **17 Jun 2027** Transposition deadline, Directive (EU) 2025/1892	**17 Apr 2028** National textile EPR schemes operational	**17 Apr 2029** EPR applies to micro-enterprises **31 Dec 2029** Commission review, possible EU targets	
Adjacent regulation			**27 Sep 2026** Empowering Consumers Directive applies	**30 Dec 2026** EUDR applies to large and medium operators	**14 Dec 2027** Forced Labour Regulation applies			

Status as of 26 October 2026 (D2.1). Indicative dates follow the Commission's ESPR Working Plan 2025–2030 (COM(2025) 187) and may change. The textile DPP application date is derived: the delegated act's date of application may not be earlier than 18 months after its entry into force, save in duly justified cases (Art. 4(4) Regulation (EU) 2024/1781). EPR dates: Directive (EU) 2025/1892. Prepared by Terraqui for LIFE DPP-TEX, WP2.

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Annex II. DPP Compliance checklist tool

To support the practical use of this analysis, Terraqui has developed an interactive DPP compliance checklist[88] for the consortium and operators in general. The checklist turns the requirements identified in this report into 91 verifiable actions, grouped under nine headings:

- scope and applicability;
- identification and operators;
- product data for pilot collection;
- access, governance and data protection;
- technical standards;
- hosting, the Registry and online sales;
- textile EPR and national implementation;
- adjacent EU compliance and environmental claims;
- regulatory watch.

Each action states its legal basis or source, with a link to the official text where available, and the work packages it concerns. A status tag shows whether the action rests on legislation already in force, on forthcoming measures, on national law, on the anticipated content of the textile delegated act as proposed in the JRC preparatory study, or is for monitoring only. Partners can filter the checklist by work package or by status. Each partner can therefore focus on the actions relevant to its own tasks, such as the WP3 data model or WP4 and WP5 pilot data collection.

The checklist is a shared working tool rather than a static annex. Consortium members with editing access can mark actions as completed and record notes on the evidence held, such as a certificate on file or a test report available. This progress is visible to all partners, together with the date and author of each update. The checklist can be exported in CSV format for inclusion in deliverables or progress reports. It reflects the regulatory position at the date of this report (26 October 2026). Items marked as anticipated may change once the textile delegated act is adopted. WP2 will update the checklist as part of the regulatory watch maintained until M30, in line with the watch points in Table 4 of Section 3. The checklist is a practical support tool and does not constitute legal advice.

[88] Permanent link: https://claude.ai/artifact/Xakm94PvvQgf4smvimvRPA.

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Annex III. Overview of the main EU legislation cited in this report

This annex summarises the 29 EU acts relied on in this report, with their official references, key dates and national implementation in Spain, Bulgaria and the Netherlands. It is a reference aid; the analysis of each act's link to the Digital Product Passport (DPP) is set out in the body of the report.

The acts are grouped by the strength of their legal link to the DPP:

- **A. Core ESPR instruments**: the framework Regulation and the acts adopted under it.
- **B. Express textual link**: acts expressly cross-referenced by the ESPR, or which themselves refer to the ESPR (for example, REACH and CLP through the definition of "substance of concern" in Article 2 (27) ESPR, and Directive (EU) 2025/1892 through ecodesign-based fee modulation).
- **C. Functional link**: acts with no textual cross-reference but a substantial overlap in data or evidence, sub-divided by theme: C1 product information and consumer law; C2 digital and data; C3 sustainability reporting and due diligence; C4 supply-chain and sourcing restrictions; C5 raw materials and trade.

Each act is shown as a card: its name links to EUR-Lex and is followed by its OJEU reference, then one row of key data. Dates come from the act's title and final provisions as published in the Official Journal of the European Union (OJEU). Regulations apply directly, so national transposition is shown once, for the eight Directives, in a single table at the end.

A. Core ESPR instruments

Ecodesign for Sustainable Products Regulation (ESPR), Regulation (EU) 2024/1781
OJ L, 2024/1781, 28.6.2024

Link to the DPP	Status	Adoption	OJEU publication	Entry into force (EIF)	Applies from	Key amendments
Establishes the DPP (Arts 9–15) and the DPP Registry (Art 13)	In force, applies later	13 Jun 2024	28 Jun 2024	18 Jul 2024	18 Jul 2024; destruction ban 19 Jul 2026 (large), 19 Jul 2030 (medium); textile DPP by delegated act (indicative 2027, then ≥18 months, Art 4(4))	Supplemented by Delegated Regulation (EU) 2026/296 and Implementing Decision (EU) 2026/1736

Commission Delegated Regulation (EU) 2026/296 (derogations from the destruction ban)
OJ L, 2026/296, 22.4.2026

Link to the DPP	Status	Adoption	OJEU publication	EIF	Applies from	Key amendments
Derogations for unsold apparel and footwear (Art 25(5) ESPR)	In force	9 Feb 2026	22 Apr 2026	12 May 2026	19 Jul 2026	—

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Commission Implementing Decision (EU) 2026/1736 (harmonised DPP standards) OJ L, 2026/1736, 15.7.2026						
Link to the DPP	**Status**	**Adoption**	**OJEU publication**	**EIF**	**Applies from**	**Key amendments**
Six DPP standards; presumption of conformity (Art 41(2) ESPR)	In force	14 Jul 2026	15 Jul 2026	15 Jul 2026	On entry into force	FprEN 18239 and 18246 pending citation

B. Express textual link with the ESPR or the DPP

REACH, Regulation (EC) No 1907/2006 OJ L 396, 30.12.2006, p. 1						
Link to the DPP	**Status**	**Adoption**	**OJEU publication**	**EIF**	**Applies from**	**Key amendments**
Substances of concern include REACH SVHCs (Art 2(27)(a) ESPR)	In force	18 Dec 2006	30 Dec 2006	1 Jun 2007	Phased from 1 Jun 2007	Annex XVII and Candidate List updated regularly

CLP, Regulation (EC) No 1272/2008 OJ L 353, 31.12.2008, p. 1						
Link to the DPP	**Status**	**Adoption**	**OJEU publication**	**EIF**	**Applies from**	**Key amendments**
Substances of concern include CLP hazard classes (Art 2(27)(b) ESPR)	In force	16 Dec 2008	31 Dec 2008	20 Jan 2009	Substances 1 Dec 2010; mixtures 1 Jun 2015	Regulation (EU) 2024/2865

Regulation (EC) No 765/2008 (accreditation and CE marking) OJ L 218, 13.8.2008, p. 30						
Link to the DPP	**Status**	**Adoption**	**OJEU publication**	**EIF**	**Applies from**	**Key amendments**
ESPR adopts its accreditation definitions (Art 2 ESPR)	Partially repealed	9 Jul 2008	13 Aug 2008	2 Sep 2008	1 Jan 2010	Market-surveillance chapter replaced by Regulation (EU) 2019/1020 from 16 Jul 2021

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Decision No 768/2008/EC (New Legislative Framework)
OJ L 218, 13.8.2008, p. 82

Link to the DPP	Status	Adoption	OJEU publication	EIF	Applies from	Key amendments
Conformity assessment modules (Art 4(5) ESPR)	In force	9 Jul 2008	13 Aug 2008	9 Jul 2008	—	—

Market Surveillance Regulation, Regulation (EU) 2019/1020
OJ L 169, 25.6.2019, p. 1

Link to the DPP	Status	Adoption	OJEU publication	EIF	Applies from	Key amendments
DPP names the operator responsible under Art 4 MSR (Annex III(k) ESPR)	In force	20 Jun 2019	25 Jun 2019	15 Jul 2019	16 Jul 2021 (some provisions 1 Jan 2021)	—

General Product Safety Regulation (GPSR), Regulation (EU) 2023/988
OJ L 135, 23.5.2023, p. 1

Link to the DPP	Status	Adoption	OJEU publication	EIF	Applies from	Key amendments
Alternative responsible-operator reference, Art 15 GPSR (Annex III(k) ESPR)	In force	10 May 2023	23 May 2023	12 Jun 2023	13 Dec 2024	—

EU Ecolabel Regulation, Regulation (EC) No 66/2010
OJ L 27, 30.1.2010, p. 1

Link to the DPP	Status	Adoption	OJEU publication	EIF	Applies from	Key amendments
Voluntary DPP information (Annex III); presumption of conformity (Art 41(4) ESPR)	In force	25 Nov 2009	30 Jan 2010	19 Feb 2010	19 Feb 2010	Textile criteria: Decision 2014/350/EU, as amended; period of validity most recently extended by Decision (EU) 2026/66 (OJ L, 2026/66, 6.1.2026), pending the revision



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						of the criteria

General Data Protection Regulation (GDPR), Regulation (EU) 2016/679
OJ L 119, 4.5.2016, p. 1

Link to the DPP	Status	Adoption	OJEU publication	EIF	Applies from	Key amendments
No customer personal data without consent under Art 6 GDPR (Art 10(1)(e) ESPR)	In force	27 Apr 2016	4 May 2016	24 May 2016	25 May 2018	Digital Omnibus proposal (19 Nov 2025), under negotiation

Waste Framework Directive (WFD), Directive 2008/98/EC
OJ L 312, 22.11.2008, p. 3

Link to the DPP	Status	Adoption	OJEU publication	EIF	Applies from	Key amendments
ESPR adopts WFD definitions and waste hierarchy (Arts 2 and 24 ESPR)	In force	19 Nov 2008	22 Nov 2008	12 Dec 2008	Transposition by 12 Dec 2010	Directives (EU) 2018/851 and (EU) 2025/1892

Directive (EU) 2025/1892 amending the WFD (textile and footwear EPR)
OJ L, 2025/1892, 26.9.2025

Link to the DPP	Status	Adoption	OJEU publication	EIF	Applies from	Key amendments
EPR fees modulated on ESPR ecodesign requirements (Art 22c(5)(a) WFD)	Transposition pending	10 Sep 2025	26 Sep 2025	16 Oct 2025	Transposition 17 Jun 2027; EPR schemes 17 Apr 2028; micro-enterprises 17 Apr 2029	—

Corporate Sustainability Reporting Directive (CSRD), Directive (EU) 2022/2464
OJ L 322, 16.12.2022, p. 15

Link to the DPP	Status	Adoption	OJEU publication	EIF	Applies from	Key amendments

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Art 24(1) ESPR lets unsold-goods disclosure sit in CSRD sustainability reports; ESRS data overlap	Transposition pending	14 Dec 2022	16 Dec 2022	5 Jan 2023	Reporting phased and postponed (transposition by 6 Jul 2024)	Directives (EU) 2025/794 and (EU) 2026/470

C. Functional link

C1. Product information and consumer law

Textile Labelling Regulation (TLR), Regulation (EU) No 1007/2011
OJ L 272, 18.10.2011, p. 1

Link to the DPP	Status	Adoption	OJEU publication	EIF	Applies from	Key amendments
Fibre-composition labelling; revision expected to converge with the DPP	In force	27 Sep 2011	18 Oct 2011	7 Nov 2011	8 May 2012	Revision proposal not yet published

European Accessibility Act (EAA), Directive (EU) 2019/882
OJ L 151, 7.6.2019, p. 70

Link to the DPP	Status	Adoption	OJEU publication	EIF	Applies from	Key amendments
Accessibility of e-commerce channels that display DPP data	In force	17 Apr 2019	7 Jun 2019	27 Jun 2019	28 Jun 2025 (transposition by 28 Jun 2022)	—

Empowering Consumers for the Green Transition Directive, Directive (EU) 2024/825
OJ L, 2024/825, 6.3.2024

Link to the DPP	Status	Adoption	OJEU publication	EIF	Applies from	Key amendments
Environmental claims substantiated with data the DPP holds	Transposition pending	28 Feb 2024	6 Mar 2024	26 Mar 2024	27 Sep 2026 (transposition by 27 Mar 2026)	Amends Directives 2005/29/EC and 2011/83/EU

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Directive on the repair of goods ("right to repair"), Directive (EU) 2024/1799 OJ L, 2024/1799, 10.7.2024						
Link to the DPP	**Status**	**Adoption**	**OJEU publication**	**EIF**	**Applies from**	**Key amendments**
Repair information overlaps DPP repairability data; textiles outside Annex II	Transposition pending	13 Jun 2024	10 Jul 2024	30 Jul 2024	31 Jul 2026 (transposition and application)	—

Packaging and Packaging Waste Regulation (PPWR), Regulation (EU) 2025/40 OJ L, 2025/40, 22.1.2025						
Link to the DPP	**Status**	**Adoption**	**OJEU publication**	**EIF**	**Applies from**	**Key amendments**
No duplication of packaging and product data carriers (Recital 70)	In force	19 Dec 2024	22 Jan 2025	11 Feb 2025	12 Aug 2026; labelling 12 Aug 2028	—

C2. Digital and data

Digital Services Act (DSA), Regulation (EU) 2022/2065 OJ L 277, 27.10.2022, p. 1						
Link to the DPP	**Status**	**Adoption**	**OJEU publication**	**EIF**	**Applies from**	**Key amendments**
Marketplace trader traceability (Art 30); pairs with Art 10(3) ESPR	In force	19 Oct 2022	27 Oct 2022	16 Nov 2022	17 Feb 2024	—

Data Act, Regulation (EU) 2023/2854 OJ L, 2023/2854, 22.12.2023						
Link to the DPP	**Status**	**Adoption**	**OJEU publication**	**EIF**	**Applies from**	**Key amendments**
Access to product-generated data; relevant to connected textiles	In force	13 Dec 2023	22 Dec 2023	11 Jan 2024	12 Sep 2025; connected-product design rules 12 Sep 2026	Digital Omnibus proposal (19 Nov 2025), under negotiation

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Artificial Intelligence Act, Regulation (EU) 2024/1689 OJ L, 2024/1689, 12.7.2024						
Link to the DPP	**Status**	**Adoption**	**OJEU publication**	**EIF**	**Applies from**	**Key amendments**
Covers AI used to extract, classify or verify DPP data	In force, applies later	13 Jun 2024	12 Jul 2024	1 Aug 2024	Staggered: 2 Feb 2025, 2 Aug 2025, 2 Aug 2026; high-risk rules 2 Dec 2027 and 2 Aug 2028	AI simplification act Regulation (EU) 2026/1744 ("Digital Omnibus on AI"), in force 27 Jul 2026

C3. Sustainability reporting and due diligence

European Sustainability Reporting Standards (ESRS), Commission Delegated Regulation (EU) 2023/2772 OJ L, 2023/2772, 22.12.2023						
Link to the DPP	**Status**	**Adoption**	**OJEU publication**	**EIF**	**Applies from**	**Key amendments**
E1, E2 and E5 datapoints mirror DPP data fields	In force	31 Jul 2023	22 Dec 2023	22 Dec 2023	Financial years from 1 Jan 2024 (in-scope undertakings)	Delegated Regulations (EU) 2025/1416 and (EU) 2026/1563

Corporate Sustainability Due Diligence Directive (CSDDD), Directive (EU) 2024/1760 OJ L, 2024/1760, 5.7.2024						
Link to the DPP	**Status**	**Adoption**	**OJEU publication**	**EIF**	**Applies from**	**Key amendments**
Supply-chain due diligence relies on DPP traceability data	Transposition pending	13 Jun 2024	5 Jul 2024	25 Jul 2024	26 July 2029 (amended by Omnibus I (Directive (EU) 2026/470))	Directives (EU) 2025/794 and (EU) 2026/470

"Omnibus I", Directive (EU) 2026/470 OJ L, 2026/470, 26.2.2026						
Link to the DPP	**Status**	**Adoption**	**OJEU publication**	**EIF**	**Applies from**	**Key amendments**

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Narrows CSRD and CSDDD scope; limits SME data requests	Transposition pending	24 Feb 2026	26 Feb 2026	18 Mar 2026	Transposition by 19 Mar 2027 and application on or after on or after 1 January 2027 (CSRD) and 26 Jul 2028 and application on 26 July 2029 (CSDDD)	—

C4. Supply-chain and sourcing restrictions

EU Deforestation Regulation (EUDR), Regulation (EU) 2023/1115 OJ L 150, 9.6.2023, p. 206						
Link to the DPP	**Status**	**Adoption**	**OJEU publication**	**EIF**	**Applies from**	**Key amendments**
Origin data overlaps the DPP; separate information system	In force, applies later	31 May 2023	9 Jun 2023	29 Jun 2023	30 Dec 2026 (large and medium); 30 Jun 2027 (micro and small)	Regulations (EU) 2024/3234 and (EU) 2025/2650; Delegated Regulation (EU) 2026/2102

Forced Labour Regulation, Regulation (EU) 2024/3015 OJ L, 2024/3015, 12.12.2024						
Link to the DPP	**Status**	**Adoption**	**OJEU publication**	**EIF**	**Applies from**	**Key amendments**
Facility data can evidence the absence of forced labour	In force, applies later	27 Nov 2024	12 Dec 2024	13 Dec 2024	14 Dec 2027	Implementing Regulation (EU) 2026/903 (ICSMS forced-labour module)

C5. Raw materials and trade

Critical Raw Materials Act (CRMA), Regulation (EU) 2024/1252 OJ L, 2024/1252, 3.5.2024						
Link to the DPP	**Status**	**Adoption**	**OJEU publication**	**EIF**	**Applies from**	**Key amendments**
Material recovery, including critical raw materials (Annex I ESPR)	In force	11 Apr 2024	3 May 2024	23 May 2024	23 May 2024 (some provisions later)	—

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Carbon Border Adjustment Mechanism (CBAM), Regulation (EU) 2023/956 OJ L 130, 16.5.2023, p. 52						
Link to the DPP	**Status**	**Adoption**	**OJEU publication**	**EIF**	**Applies from**	**Key amendments**
Embedded emissions overlap the carbon footprint field; methodologies differ	In force	10 May 2023	16 May 2023	17 May 2023	Transitional 1 Oct 2023; definitive 1 Jan 2026	Regulation (EU) 2025/2083

Transposition of the Directives

Of the eight Directives, only the WFD base text and the EAA are transposed in all three countries; the Right to Repair Directive and the CSDDD are pending in all three.

Directive	Deadline	Spain	Bulgaria	The Netherlands
WFD, Directive 2008/98/EC	12 Dec 2010	Yes: Ley 7/2022 (BOE núm. 85, 9.4.2022)	Yes: Закон за управление на отпадъците (ДВ бр. 53, 13.7.2012)	Yes: Wet milieubeheer, Chapter 10; 2018 amendment by Stb. 2020, 158
Textile EPR, Directive (EU) 2025/1892	17 Jun 2027	Pending: draft Real Decreto on textile and footwear products (MITECO)	Pending: draft Наредба за отпадъците от обувки и текстил	Partially: Besluit UPV Textiel (Stb. 2023, 132) pre-dates it; amendment in preparation
EAA, Directive (EU) 2019/882	28 Jun 2022	Yes: Ley 11/2023 (BOE núm. 110, 9.5.2023)	Yes: Закон за изискванията за достъпност на продукти и услуги (ДВ бр. 31, 11.4.2025); late notification found by the CJEU, Case C-646/24	Yes: Implementatiewet toegankelijkheidsvoorschriften producten en diensten, Wet van 8 april 2024, Stb. 2024, 87; in force since 28 June 2025 (Stb. 2024, 341)

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Empowering Consumers, Directive (EU) 2024/825	27 Mar 2026	Pending: Anteproyecto de Ley de Consumo Sostenible; infringement procedure opened May 2026	Yes: ДВ, бр. 87 от 24.09.2026 г.	Yes: Implementatiewet richtlijn betere duurzaamheidsinformatie voor consumenten (Stb. 2026, 152); applies from 27 Sep 2026 (Act implementing the Directive on better sustainability information for consumers)
Right to repair, Directive (EU) 2024/1799	31 Jul 2026	Pending: Anteproyecto de Ley de Consumo Sostenible	Pending: bill before the National Assembly (first reading)	Pending: bill submitted 10 Jul 2026 (Wetgevingskalender WGK028011)
CSRD, Directive (EU) 2022/2464	6 Jul 2024	Pending: Proyecto de Ley de Información Empresarial sobre Sostenibilidad; Ley 11/2018 applies meanwhile	Yes: Act amending the Accounting Act (ДВ, бр. 72 от 27.08.2024 г., in force from 6 July 2024) and Act amending the Independent Financial Audit Act, renamed the Independent Financial Audit and Sustainability Assurance Act (ДВ, бр. 79 от 17.09.2024 г.)	Pending: Kamerstukken 36 678
CSDDD, Directive (EU) 2024/1760	26 Jul 2028, as amended by Omnibus I	Pending	Pending	Pending: Wetsvoorstel internationaal verantwoord ondernemen
Omnibus I, Directive (EU) 2026/470	19 Mar 2027 (CSRD) and 26 Jul 2028 (CSDDD)	Pending	Pending	Pending: being incorporated into Kamerstukken 36 678

Two Regulations are supplemented by national law, though not transposed: the GDPR (Spain: Ley Orgánica 3/2018; Bulgaria: Закон за защита на личните данни, ДВ бр. 17, 26.2.2019; the Netherlands: UAVG, Stb. 2018, 144) and the EU Ecolabel Regulation (Spain: Real Decreto 234/2013, designating the competent bodies).

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