

‘What’s next for the EU’s Sustainable Textiles Agenda: key milestones and what they mean’

November 2025

The past few years have seen unprecedented legislative activity for the textile, apparel and footwear sectors in Europe. Major files have been adopted or proposed – defining how products placed on the EU market must be designed, labelled, traced and disposed of. Now the hard work begins: implementation. For brands, suppliers, manufacturers, recyclers and service providers, this means turning regulatory direction into operational reality: from digital data flows, unsold stock protocols, to extended producer responsibility, traceability and consumer-facing information.

Beyond implementation, several key files are still being negotiated – including the Corporate Sustainability Due Diligence Directive (CS3D), the Corporate Sustainability Reporting Directive (CSRD), the Green Claims Directive (GCD) and the EU Deforestation Regulation (EUDR) - others are still to be published, such as the revision of the Textile Labelling Regulation, the Circular Economy Act, the Environmental Omnibus Regulation, or the Bioeconomy Strategy. Meanwhile, **the core legislative framework for textiles is already in motion**, and key dates are fast approaching.

Below is an overview of the very latest state of play and what is coming in the next months. Please bear in mind that all the dates and potential timeline for implementation reflect the most updated information we have as of early November 2025.

Ecodesign for Sustainable Products Regulation (ESPR)

The **ESPR** is the backbone of the EU’s approach to product sustainability, and apparel textiles are the first product group for which ecodesign will become a **market-entry requirement**. After the Regulation entered into force in **July 2024**, the focus has shifted to implementation through delegated and implementing acts that will operationalise its main elements for the textile sector.

The Textiles Delegated Act

The **Textiles Delegated Act** will be the central piece of secondary legislation under the ESPR for this sector. It will set specific **ecodesign requirements** for textile products - addressing aspects such as durability, repairability, recycled content and recyclability. In practice, it will determine which textiles can be placed on the EU market and under what conditions.

Expected in **mid to late 2027**, this act will set the **specific ecodesign requirements** for textile products – potentially covering areas such as durability, repairability, recyclability and recycled content. It is likely to become applicable around **2029**, after which only compliant products will be able to be placed on the EU market. It will also determine the **information to be included in each product’s Digital Product Passport (DPP)** – see below.

The Digital Product Passport (DPP)

The DPP will act as a digital identity accompanying products throughout their life cycle, carrying product sustainability information and enabling traceability. It will connect designers, manufacturers, recyclers and even consumers through a shared layer of product data. The system is taking shape in stages:

- By **the end of 2025 (tbc)**, the European Commission plans to adopt a **delegated act** detailing how service providers – those that will store and process DPP Data on behalf of responsible economic operators – must function.
- **By March 2026**, the European standards bodies **CEN and CENELEC** are expected to publish the technical standards defining data processing, storage, data carriers, infrastructure interoperability, etc.
- **The EU-wide DPP Registry** must be set up by the European Commission **by July 2026**, serving as the reference system where each product's digital passport can be located.

Unsold apparel and footwear

ESPR also tackles the destruction of unsold goods. From **July 2025**, companies need to **report publicly** on the number and weight of discarded goods the reasons for doing so, and the waste treatment operations they undergo. To ensure consistency among different companies' disclosures, the Commission is set to publish in the Official Journal of the EU an **Implementing Act** specifying the **format for disclosure of information** in **Q4 2025**. It should apply as of **Q4 2026**, and the format itself will become mandatory for **products discarded from the first full financial year after its application** - if your financial year starts in January, the format for you applies as of January 2027.

From **19 July 2026**, the **prohibition on the destruction of unsold textiles and footwear** becomes applicable for textile products.. Before that, in **late 2025/early 2026**, a **Delegated Act** will be officially published the limited **exemptions** to the upcoming ban.

Waste Framework Directive (WFD)

The revised WFD marks the EU's first binding framework for **Extended Producer Responsibility (EPR) schemes for textiles** - meaning that, for the first time, producers will be responsible for what happens to their products at end-of-life. The Directive formally **entered into force on 16 October 2026**, setting in motion a sequence of transposition steps over the following years:

- By **17 June 2027**, Member States must **transpose the Directive** into their national legislation. At this point, some Member States will already have EPR schemes in place, while by **17 April 2028**, any Member State that does not yet have an operational EPR scheme for textiles will be required to **establish one**.
- By **17 April 2027**, the European Commission must publish an **Implementing Act on the harmonised format for registration of producers** in national registers, enabling easier compliance for textile companies that operate in multiple EU markets.
- Around **mid-2027 (tbc)**, the Commission is expected to publish an **Implementing Act on ecomodulation of EPR fees** – meaning that the fees producers pay into the system will vary depending on the environmental performance of their products (e.g., if they are easily recyclable, contain recycled fibres, etc.). This mechanism is likely to follow ecodesign requirements for textiles under ESPR. The EC also announced that work will start soon on a study on environmental parameters for footwear, to base the work on the upcoming ecomodulation for footwear.
- Finally, from **17 April 2029**, the Directive will apply to **micro-enterprises** - those with fewer than ten employees and an annual turnover not exceeding €2 million. **2029** will also be the year in which the Commission will **evaluate the Waste Framework Directive** and assess the need for further revision.

1. Empowering Consumers for a Green Transition Directive (ECGT) and Green Claims Directive (GCD)

The **ECGT Directive**, which entered into force on **27 March 2024**, amends the EU's long-standing consumer-protection framework. Member States must **transpose the Directive by 27 March 2026**, and the new rules will **apply from 27 September 2026**. From that point, generic or unsubstantiated terms such as “eco-friendly”, “carbon-neutral” or “green” will no longer be acceptable unless they are backed by clear, recognised evidence.

The directive also introduces new requirements for information on **product durability** and **legal guarantees**. An **Implementing Act** adopted in **September 2025** defined the exact design and format of an **EU label** showing product durability and of a **standardised notice** on consumer rights under legal guarantees. Both instruments will become mandatory when the new rules start to apply in **September 2026**.

Complementary to the ECGT is the **Green Claims Directive (GCD)**. It aims to establish a common EU methodology for verifying environmental claims and labels, so that when a company says a product is “climate-neutral”, that claim is backed by measurable data and independently verified. Negotiations on the Directive are currently **paused** due to debates over the burdens for companies. However, the initiative remains on the Commission's legislative agenda, although the timeline for its adoption and subsequent application is uncertain.

Forced Labour Regulation (FLR)

Adopted at the end of **2024**, the FLR introduces an EU-wide ban on placing or making available products made with forced labour on the Union market – as well as exporting them from the EU. It applies to all, including the textile, apparel and footwear sectors. The Regulation **entered into force in December 2024**. Following a transposition period, it will **become applicable on 14 December 2027**.

By 14 June 2026, the Commission will **publish the central EU database** with information on forced labour risks in specific geographic areas or product groups. By the same date, the Commission must publish **implementation guidelines**, covering areas such as due diligence expectations proportionate, risk indicators, and best practices.

What is next - a moving horizon for textiles

Even as key files move into implementation, the legislative landscape for textiles remains in flux. Several major frameworks – including the **EUDR**, **CS3D** and **CSRD** – are under revision to simplify requirements and revise scope, timelines, and reporting requirements. The outcomes of these discussions are expected in **late 2025** or **early 2026**.

The **Textile Labelling Regulation**, due in **April 2026**, will revise the existing rules on mandatory labelling – from fibre composition and country of origin to the presentation of care, size and other essential product information. It will also examine how digital labelling formats can complement physical tags and interact with the DPP under the ESPR.

Finally, the **Circular Economy Act** (foreseen for **Q3 2026**) and the **Environmental Omnibus Regulation** (expected at the **end of 2025** or **early 2026**) are both likely to amend or consolidate existing environmental legislation and could introduce elements of EU-wide **EPR harmonisation** relevant to textile waste.