

SEPTEMBER 2025



Federation of the European
Sporting Goods Industry

FESI PRESENTATION ON FRENCH ECO SCORE

WFSGI



J É R Ô M E P E R O - F E S I S E C R E T A R Y G E N E R A L

AGENDA

- 01 What it is and what's new
- 02 Timeline & who must comply
- 03 Scope: included & excluded products
- 04 How the score is calculated (Ecobalyse)
- 05 Data you must provide
- 06 Publication rules & third-party scoring
- 07 When it's mandatory
- 08 External service providers
- 09 External service providers

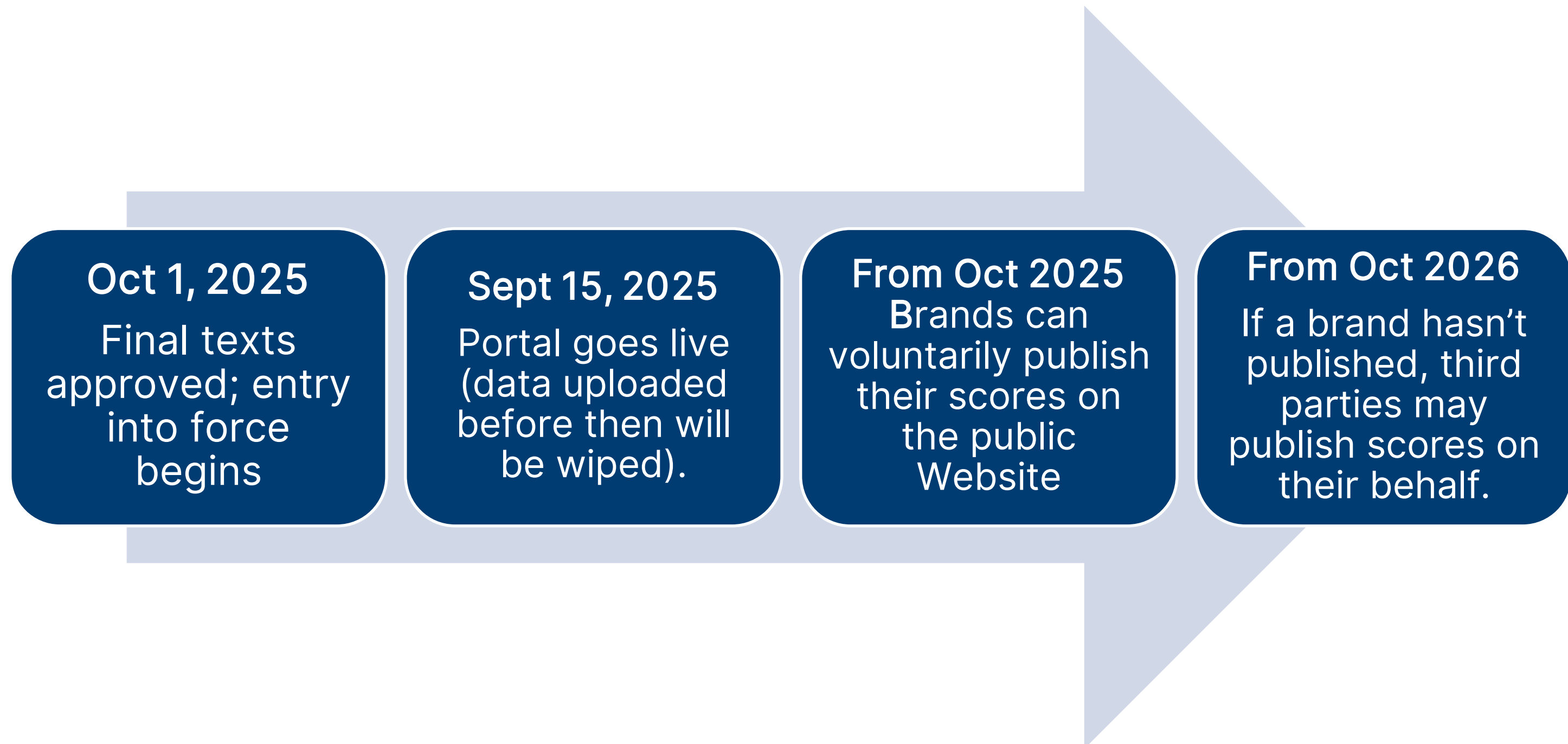


WHAT IS THE “ENVIRONMENTAL COST”?

Environmental labelling reflects the “environmental cost” associated with each garment over its entire life cycle. The system encourages manufacturers to implement best practices (eco-design), and consumers to choose products with lower impact and avoid over-consumption.

- France’s official apparel environmental labelling scheme (aka Eco-Score).
- Created under the AGEC & 2021 Climate and Resilience Laws; coordinated with ADEME.
- Outputs a single numeric score (environmental points) per product shown to consumers.
- Higher points = higher environmental impact.
- Methodology is LCA-based with 16 indicators; normalized, weighted, then adjusted for apparel specifics.

TIMELINE



WHO MUST COMPLY ?

1



All producers, importers, and distributors placing apparel on the French market—regardless of origin

2



Non-French companies selling in France are included

3



No explicit exemptions for small brands or company size thresholds are mentioned

WHICH PRODUCTS ARE IN SCOPE

- Applies to « Textile clothing » made primarily of textile fibres (incl. trims/components).
- Covered categories (11): boxer/briefs; underpants; socks; shirt; jeans; skirt/dress; swimsuit; coat/jacket; pants/shorts; pullover; T-shirt/polo.

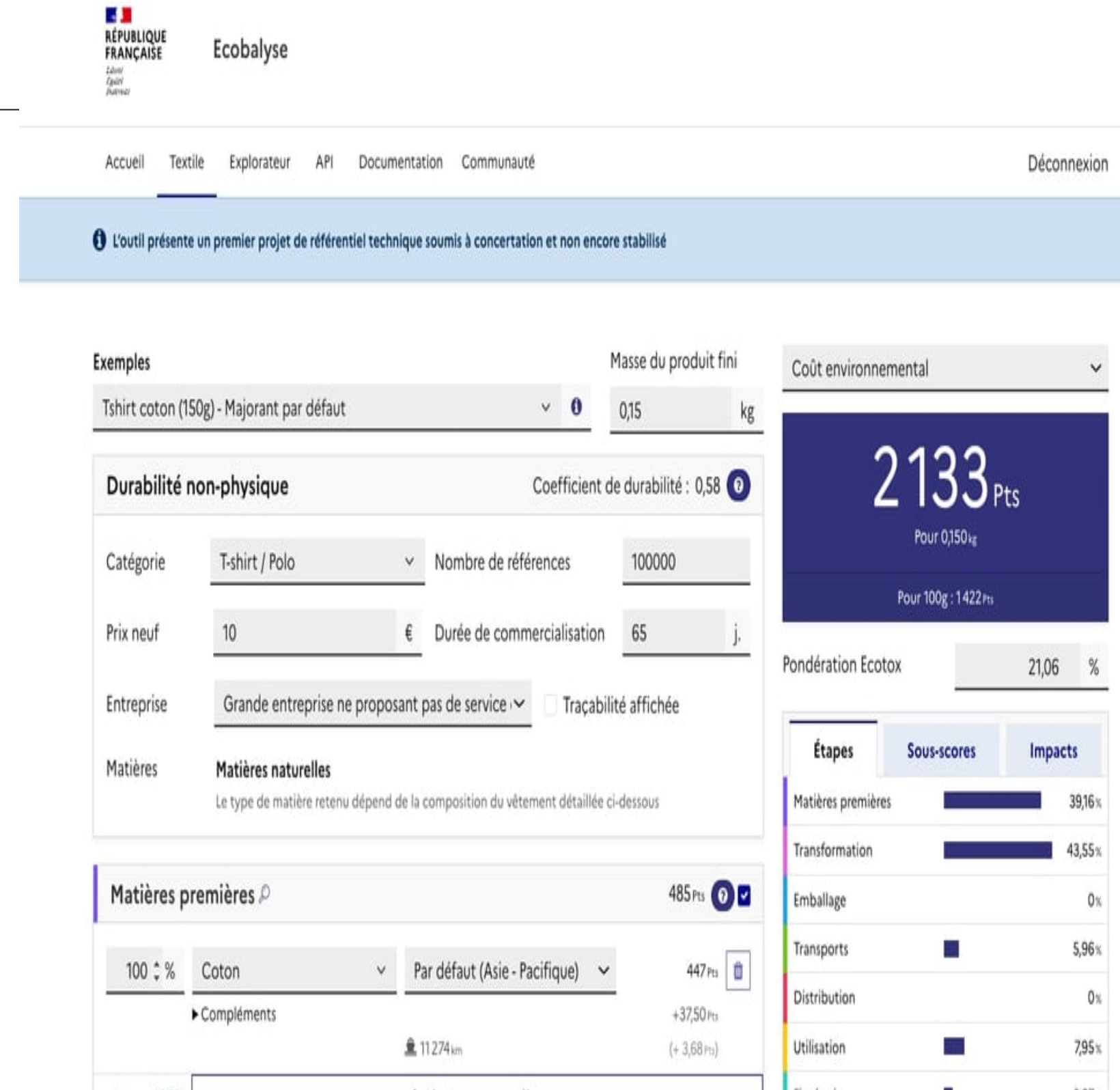


WHAT IS EXCLUDED ?

- Second-hand products.
- >20% non-textile materials by mass, or >20% materials not modelled in Ecobalyse.
- Products integrating electronic components.
- Leather products & accessories (belts, bags, pouches, etc.).
- Personal protective equipment (unless sold directly to consumers).
- Shoes & accessories are excluded even if they contain textiles.

METHODOLOGY

- **Official tool:** Ecobalyse calculates the Environmental Cost per product. <https://ecobalyse.beta.gouv.fr/>
- The tool allows users to enter **basic product attributes** — such as material composition, weight, place of manufacture, and processing — to generate an aggregated environmental impact score, called a “coût environnemental” (Environmental Cost), expressed in numeric points.
- **Assessment levels** were designed as 1) simplified LCA; 2) brand data; 3) full product LCA. Currently required: Level 1 (simplified, global-average data). Levels 2–3 remain under development.
- **Ecobalyse is currently in French;** an English calculator/benchmark is available from various service providers.



REPUBLICQUE FRANÇAISE **Ecobalyse**

Accueil Textile Explorateur API Documentation Communauté Déconnexion

L'outil présente un premier projet de référentiel technique soumis à concertation et non encore stabilisé

Exemples Tshirt coton (150g) - Majorant par défaut 0,15 kg

Durabilité non-physique Coefficient de durabilité : 0,58

Catégorie T-shirt / Polo Nombre de références 100000

Prix neuf 10 € Durée de commercialisation 65 j.

Entreprise Grande entreprise ne proposant pas de service Traçabilité affichée

Matières **Matières naturelles**
Le type de matière retenu dépend de la composition du vêtement détaillée ci-dessous

Matières premières 485 Pts

100 % Coton Par défaut (Asie - Pacifique) 447 Pts

Compléments +37,50 Pts (+ 3,68 Pts)

Coût environnemental

2133 Pts
Pour 0,150 kg
Pour 100g : 1422 Pts

Pondération Ecotox 21,06 %

Étapes	Sous-scores	Impacts
Matières premières		39,16%
Transformation		43,55%
Emballage		0%
Transports		5,96%
Distribution		0%
Utilisation		7,95%

WHICH DATA MUST BE PROVIDED ?

- **Step 1:** Life-cycle modelling (materials → processing → assembly → transport → use → end-of-life).
- **Step 2:** 16 Product Environmental Footprint (PEF) categories are computed.
- **Step 3:** Normalization and weighting → aggregated 'Environmental Cost' points.
- Weighting differs slightly from EU PEF: freshwater ecotoxicity is double-weighted; both human-toxicity indicators carry zero weight.
- **Step 4** (apparel-specific): fixed penalties for microplastic shedding & export of used garments outside the EU.



DURABILITY COEFFICIENT

- Coefficient ranges approx. 0.67 (low durability) → 1.45 (high durability).
- Two equal drivers (50/50): range breadth (SKU count in the category) and repair incentive.
- If a brand provides no data, conservative defaults apply (e.g., large range, no repair service).
- Higher durability spreads impacts over more wears → lower cost per wear.



DATA YOU MUST PROVIDE

- Product category.
- Mass of the finished product.
- Nature & % of raw materials.
- Country of textile formation (weaving/knitting).
- Country of finishing (ennoblement/dyeing).
- Country of assembly (confection).

OPTIONAL DATA (BUT RELEVANT)

- Remanufactured vs new status; number of products in segment (range breadth).
- Reference price; company size; repair-service offering.
- Origin of raw material sourcing and spinning.
- Finishing details (e.g., printed surface %); washing processes.
- Share of air transport; list of accessories.
- If left blank, Ecobalyse uses conservative defaults/worse cases (e.g., 'India' as default production, 100% air freight, ultra-fast-fashion durability).

PUBLISHING THE SCORE & CONSUMER ACCESS

1. **Score is per sales reference** (per colourway), based on a representative size.
2. **Information must be publicly accessible** at the point of purchase (online or at checkout).
3. **Brand-calculated scores** published on the portal are the reference and replace third-party ones (up to a 1-month delay).

WHY **START** NOW ?

- **After 1 year**, any third party (NGO, retailer, journalist, etc.) may publish a score if the brand hasn't.
- Third parties must use conservative defaults for missing data → typically a higher (worse) score.
- **Publishing your own score** ensures accuracy and automatically replaces third-party scores.
- If you already display any single environmental score (e.g., carbon footprint) on French product pages, you must also display the official Environmental Cost label.



EXISTING SERVICE PROVIDERS

There are many local and global service providers

1. <https://www.carbonfact.com/>
2. <https://www.peftrust.com/>
3. <https://www.glimpact.com/>
4. <https://worldly.io/>
5. <https://ecobalyse.beta.gouv.fr/#/textile/simulator>

WHAT IS FESI DOING

- Coordinating with our French National federation Union Sport Cycle <https://www.unionsportcycle.com/accueil>
- Filed in response to TRIS notification raising major concerns over EU single market, alignment with PEF, Green Claims, ESPR (DPP), TLR, De facto obligation
- As result EU issued opinion: FR initiative must remain voluntary
- Could consider formal complaint if French response not satisfying



LET'S STAY IN TOUCH

Thank you!

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