OEKO-TEX® Public Stakeholder Consultation

Results 2026

OEKO-TEX® is a global certification scheme for textile and leather sustainability

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An overview

OEKO-TEX® conducted a Public Stakeholder Consultation from 14th July to 14th September 2026. We consulted on recycled textile claims and supply chain integrity.

The goal of the OEKO-TEX® Public Stakeholder Consultation is to allow for the participation of stakeholders in the OEKO-TEX® Standard Setting Process. We engage stakeholders at key stages, ensuring their feedback is effectively integrated by our committees during the development of updates to the OEKO-TEX® Standards.

Every comment and input received from stakeholders has been reviewed internally and passed on to the responsible team. The feedback will support the Product Management Team in the development of future OEKO-TEX® Standards.

87 participants

28 countries

3.79/5 perceived familiarity with the topic

Participant profiles

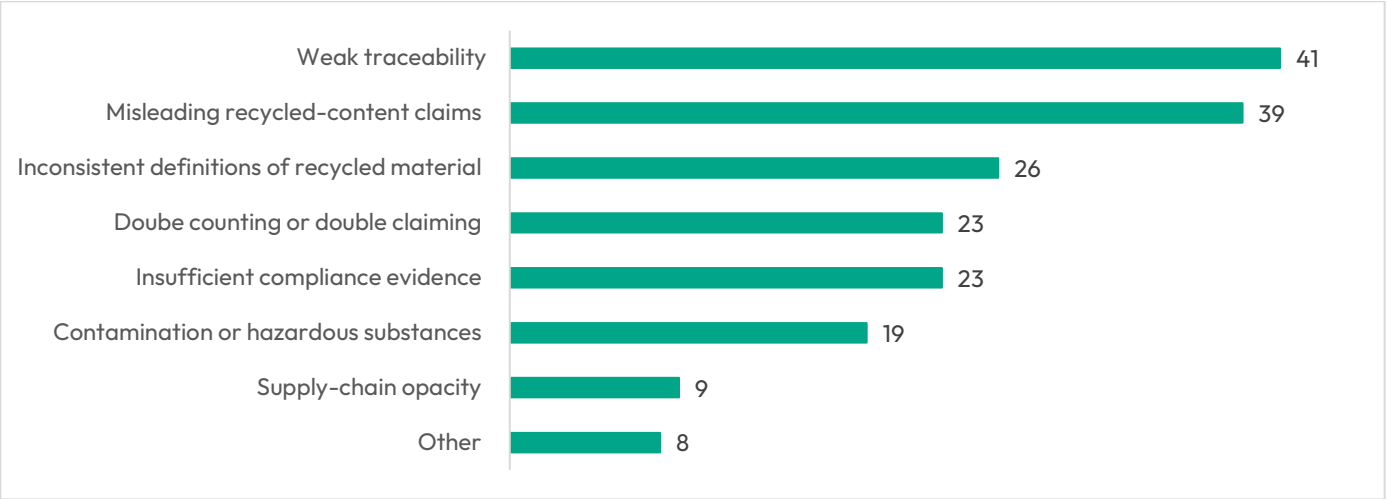
Stakeholder group	Areas of expertise	Locations
Manufacturer (28%)	Product compliance (24%)	France (13%)
Technical expert (17%)	Textile recycling (14%)	India (13%)
Brand (13%)	Circular economy (10%)	Germany (11%)
Retailer (8%)	Chemical safety (10%)	Switzerland (7%)
Standards specialist / assurance expert (8%)	Audit or assurance (7%)	Pakistan / Italy (6% each)

Results

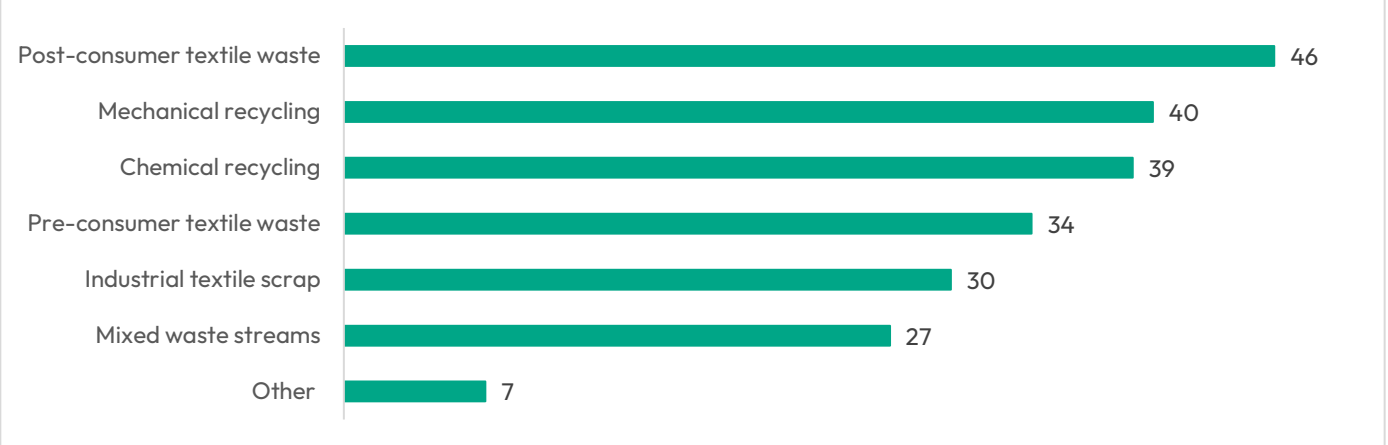
The following tables present the results of the consultation. Please note that all figures indicate the number of votes received, not the number of respondents. As multiple answers were permitted for some questions, the total number of votes varies from question to question.

Definition of Recycled Material

Question 1: In your opinion, what is the single biggest risk or issue in recycled textile claims today?

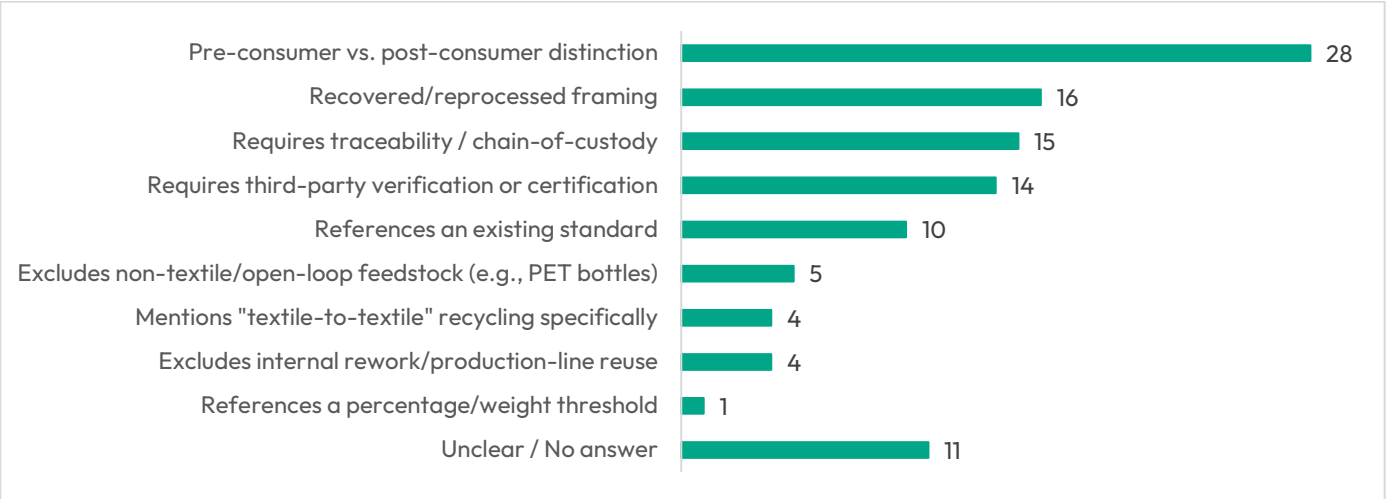


Question 2: Which recycling pathways are most relevant to consider for future scalability?



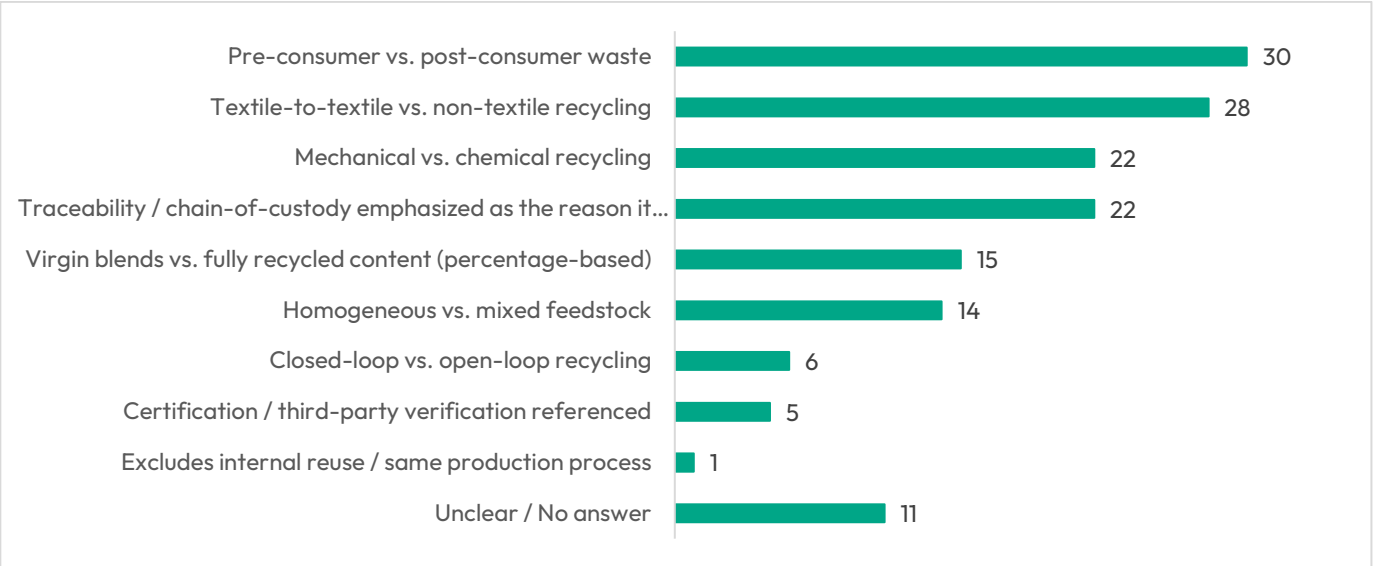
Question 3: How should recycled material be defined for textile applications?

The responses below are grouped by underlying position, since this was an open-text question with no fixed answer choices. Please find the original comments in the Annex.



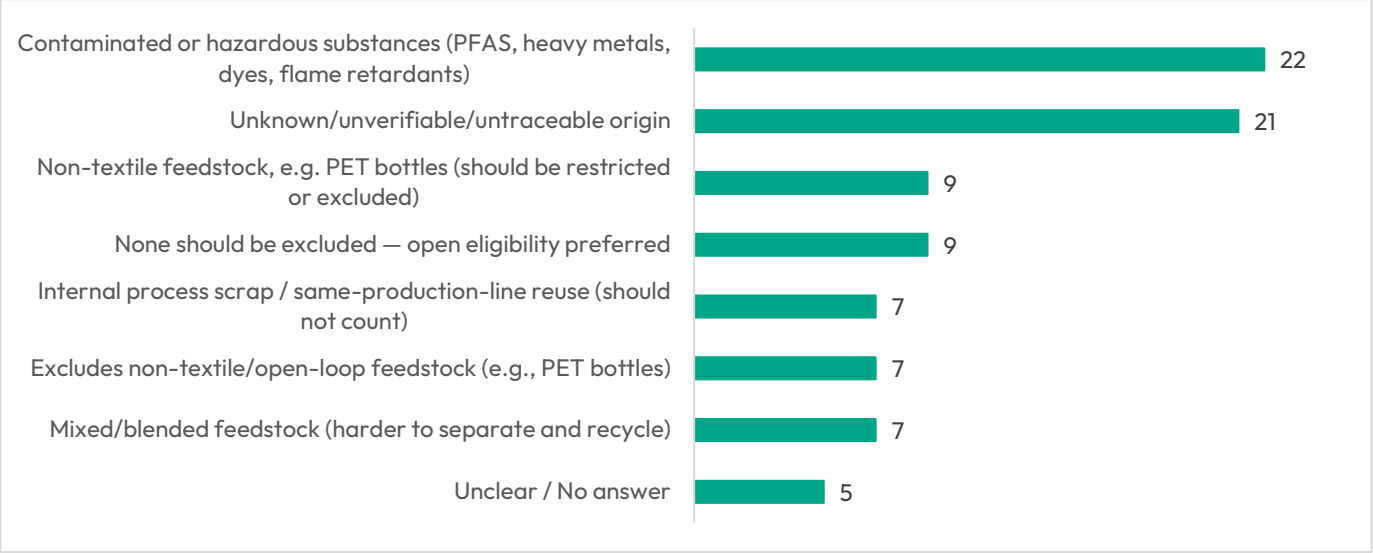
Question 4: Which distinctions matter most when defining recycled material, and why? For example: pre-consumer versus post-consumer waste, textile-to-textile versus non-textile recycling, mechanical versus chemical recycling.

The responses below are grouped by underlying position, since this was an open-text question with no fixed answer choices. Please find the original comments in the Annex.

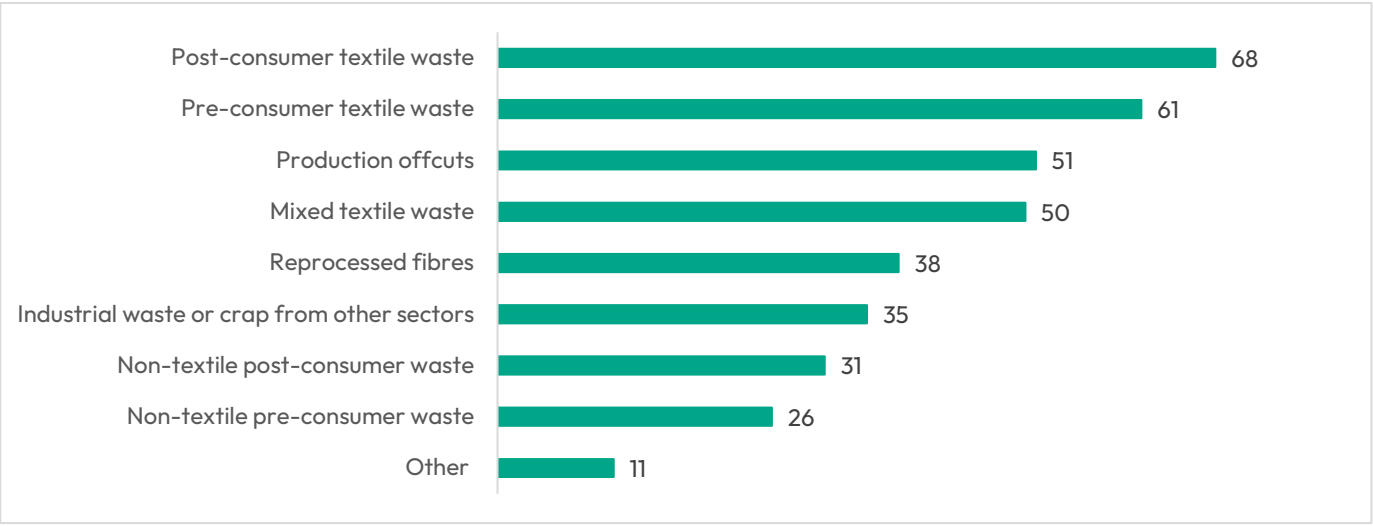


Question 5: Which feedstock types should be excluded or restricted, and why?

The responses below are grouped by underlying position, since this was an open-text question with no fixed answer choices. Please find the original comments in the Annex.

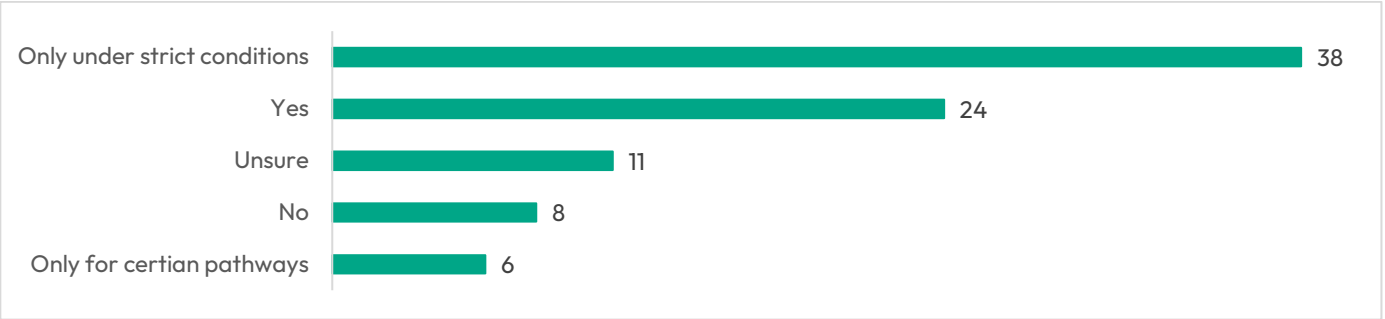


Question 6: Which feedstock types should qualify as recycled input?



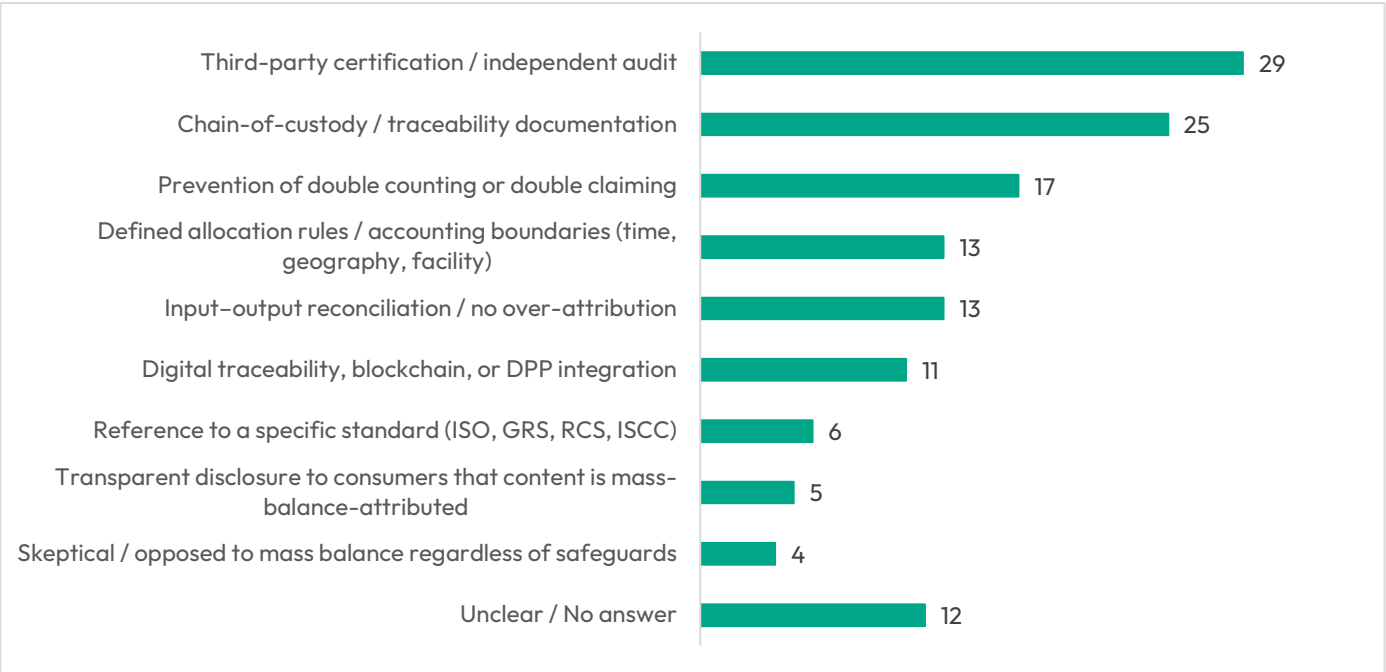
Mass Balance and Chemical Testing

Question 7: Should mass balance be recognized as a valid accounting method?



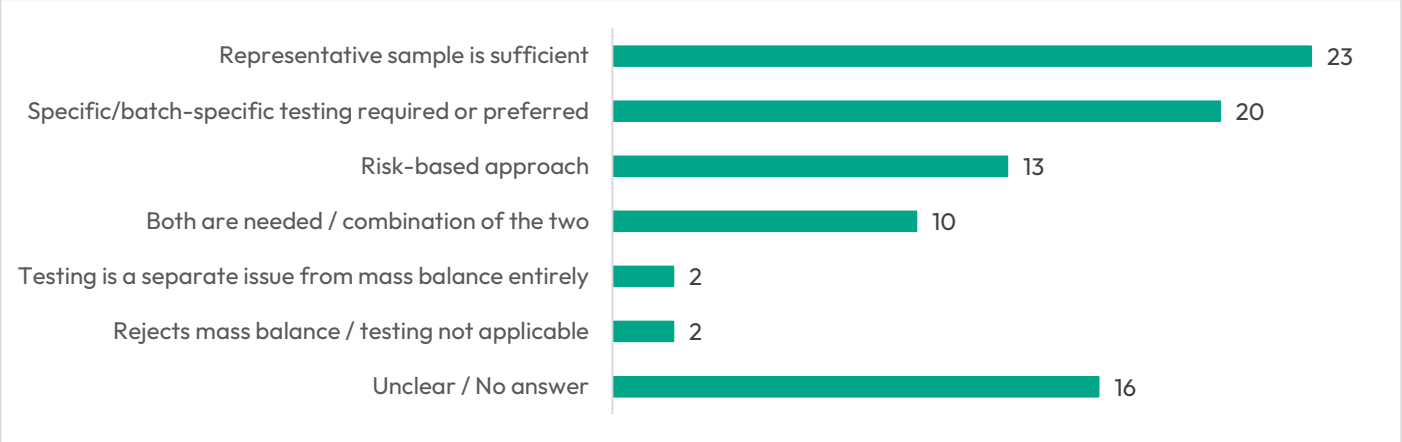
Question 8: If mass balance is used, what safeguards should apply?

The responses below are grouped by underlying position, since this was an open-text question with no fixed answer choices. Please find the original comments in the Annex.

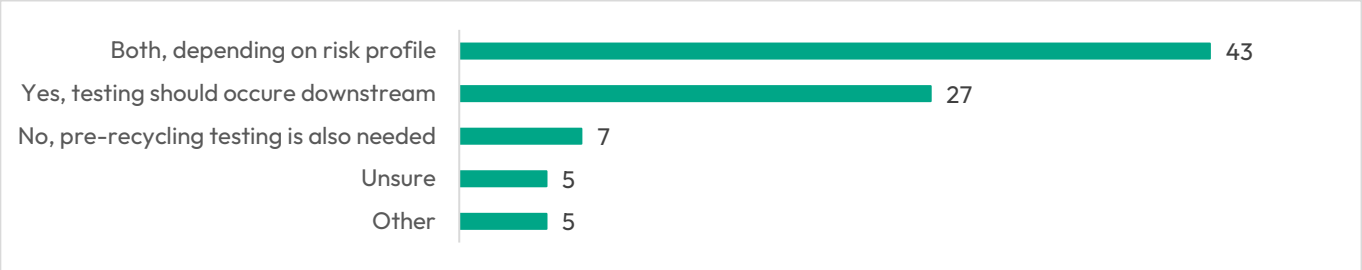


Question 9: Where mass balance is used, should chemical or hazardous-substance testing be conducted on the specific physical batch carrying the recycled-content attribution, or is testing a representative sample sufficient?

The responses below are grouped by underlying position, since this was an open-text question with no fixed answer choices. Please find the original comments in the Annex.

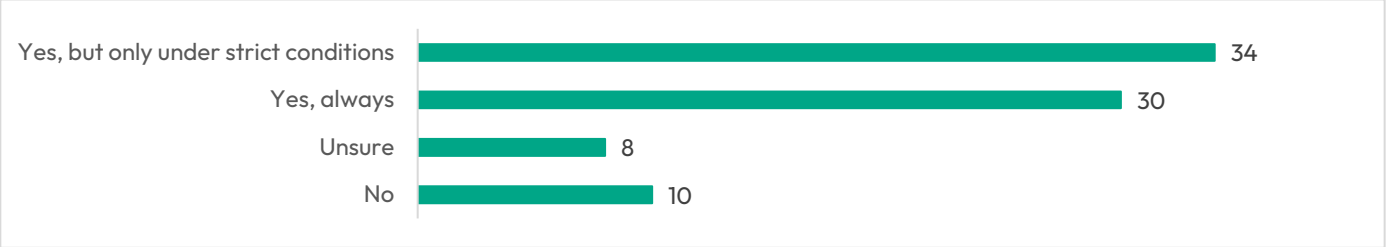


Question 10: Should the point of chemical testing be required to occur downstream of the recycling process, for example at yarn or fabric stage, rather than on pre-recycling feedstock?



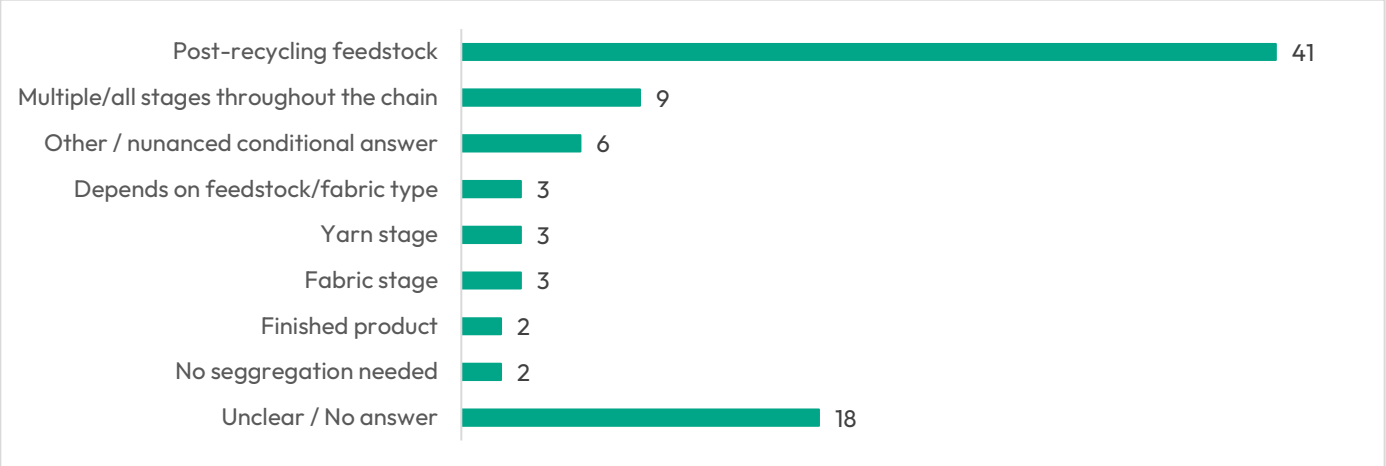
Physical Segregation

Question 11: Independent of documentary or mass-balance traceability, should physical segregation of recycled material from virgin material be required at any point in the supply chain?



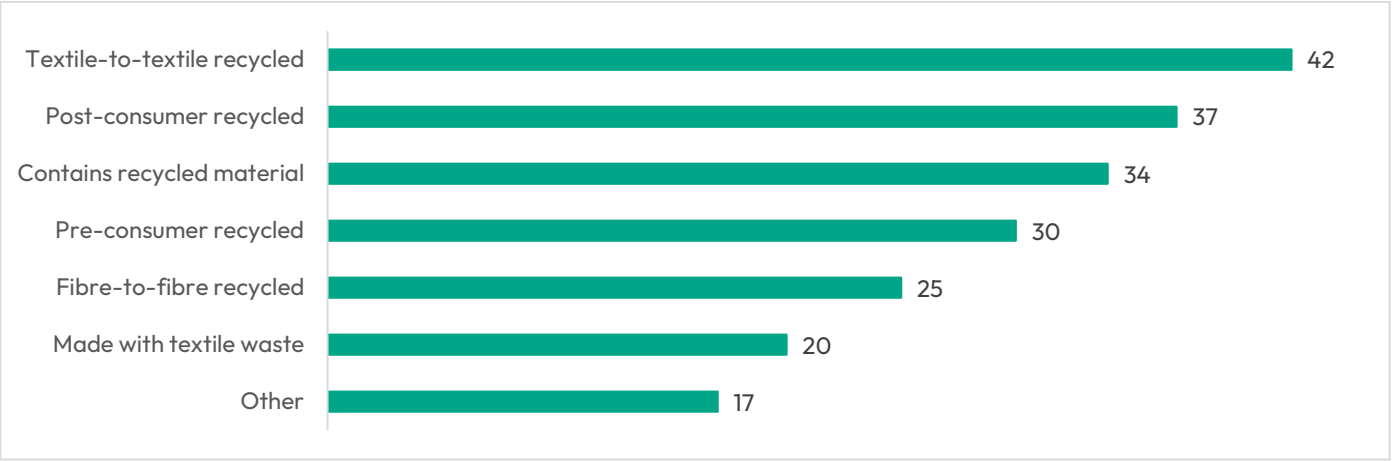
Question 12: If segregation is required, at what stage should it begin: post-recycling feedstock, yarn stage, fabric stage, or finished product?

The responses below are grouped by underlying position, since this was an open-text question with no fixed answer choices. Please find the original comments in the Annex.



Claims and Labelling

Question 13: Which types of recycled-content claims do you consider credible today?

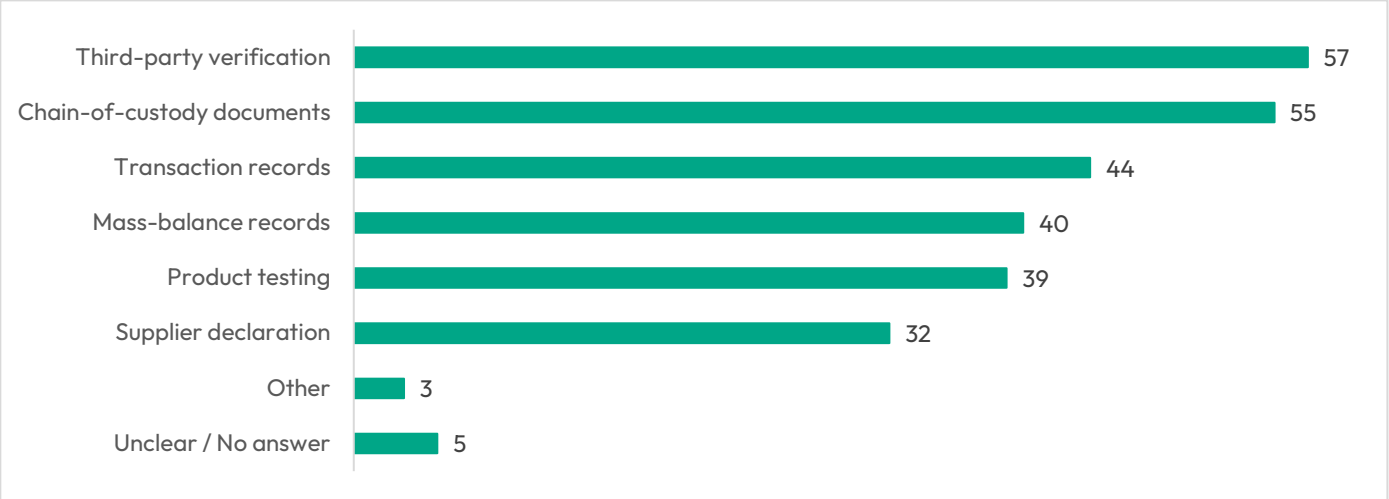


Below are the comments of those responded “Other”.

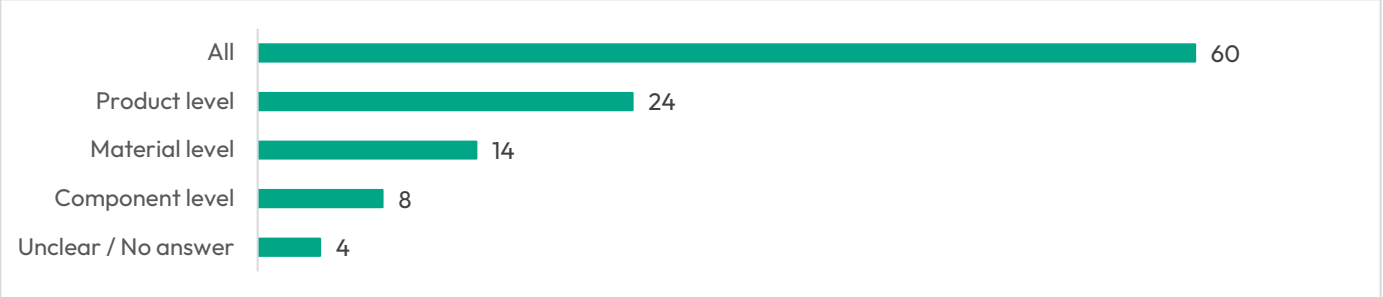
Stakeholder feedback
GRS certified
In my view, textile recycling is a multi-stage process, and several points along the chain are critically important. It starts from the consumer stage, where garments are collected for recycling. From there, the process continues through sorting, and ultimately toward fiber-to-fiber recycling. One key factor that is often underestimated is color-based sorting—being able to accurately separate materials not only by fiber type but also by color can significantly improve efficiency and output quality. Advanced, digital sorting systems (rather than manual handling) are essential to make this process scalable, precise, and economically viable. Automation is no longer optional—it's a requirement if we want to achieve true circularity in textiles. Better sorting at the beginning means better recycling outcomes at the end.
no one of these claim
none see TLR
Made with recycled material
Depends on if there is some kind of verification
The law do not require this. So as no legal definition, non is really credible.
Unfortunately this is still very rare, the other seem to be too vague
I don't trust recycled-content claims.
If I see any of this, I won't buy
None without evidence
I believe there are more recycled claims than recycled feedstock.
claims that are precise on the fiber type and quantity within the total fibers used. Even better when it says where it comes from
From a traceability infrastructure perspective, no claim type is inherently credible — credibility is a function of the evidence backing it, not the label. That said, more specific claims ('Post-consumer recycled', 'Textile-to-textile recycled', 'Fiber-to-fiber recycled') are at least more verifiable in principle because the material identity is more

defined and the chain of custody is more bounded. Broad claims like 'Contains recycled material' or 'Made with textile waste' are too vague to support independent verification and should not be considered credible without significantly more substantiation. We do not select individual options as credible in the abstract.
ensure the possibility to add an explanatory claim
We do not differentiate pre or post on material composition label. All above claims can be credible if there is a valid proof of that claim and claims should be audited to ensure that they are credible.
For AHP not all are applicable. From a credibility pov I would say none of them, a credible claim would need to more specified, e.g. give a percentage of recycled material.
ensure the possibility to add an explanatory claim

Question 14: What evidence should be required for a claim?



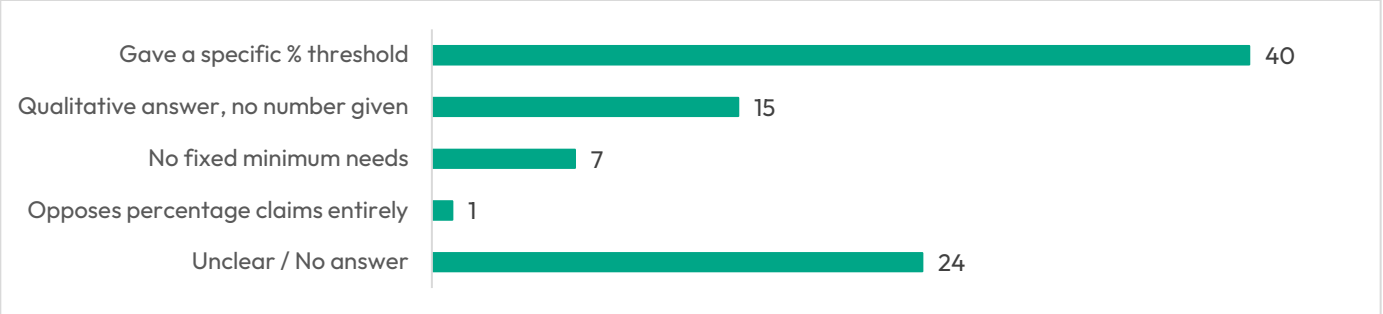
Question 15: At what level should claims be allowed?

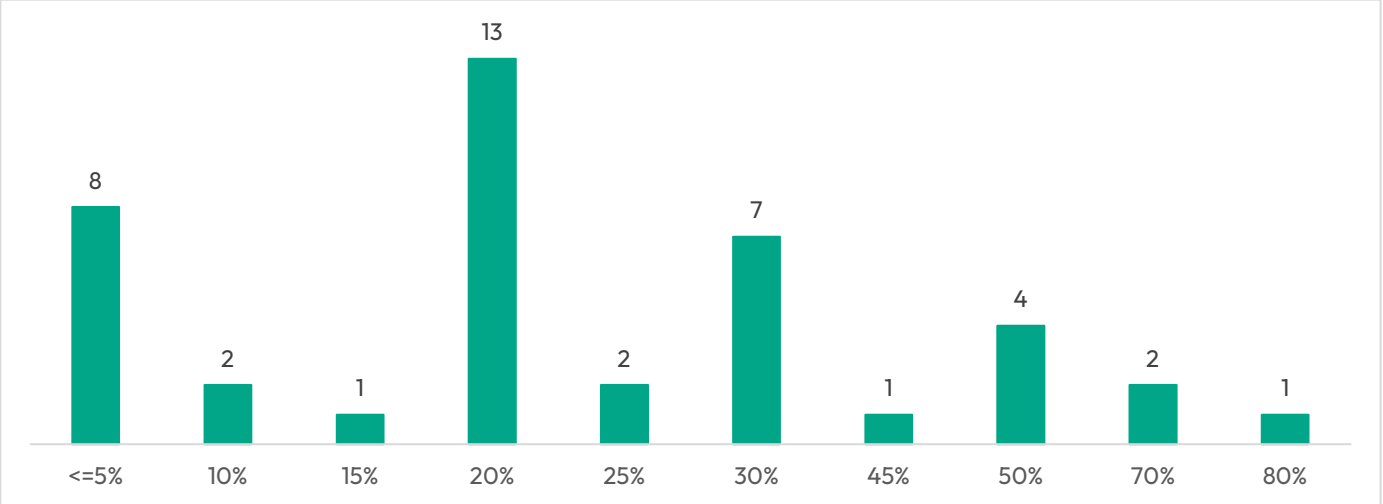


Question 16: Should percentage claims be permitted?

Question 17: If percentage claims are permitted, what minimum threshold or substantiation standard should apply, and why?

The responses below are grouped by underlying position, since this was an open-text question with no fixed answer choices. Please find the original comments in the Annex.

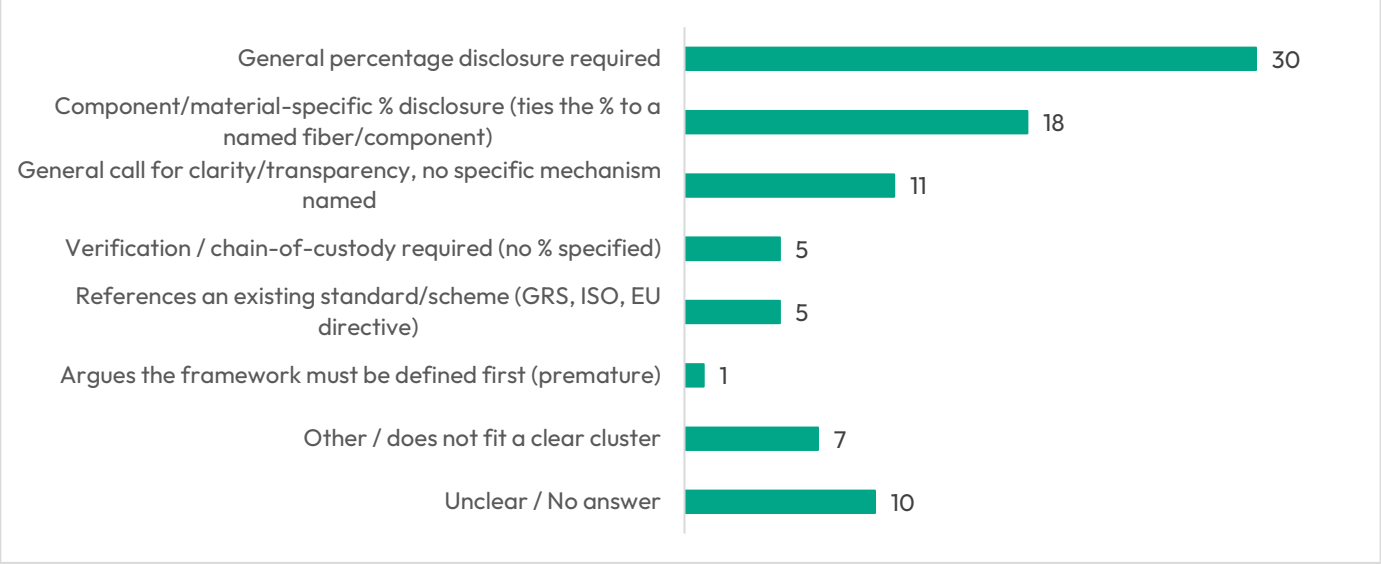




Question 18: Should the minimum recycled-content threshold required to make a claim differ between intermediate supply-chain actors, such as yarn or fabric producers, and finished, consumer-facing products?

Question 19: How should blended products and partial recycled content be addressed in claims and labeling?

The responses below are grouped by underlying position, since this was an open-text question with no fixed answer choices. Please find the original comments in the Annex.



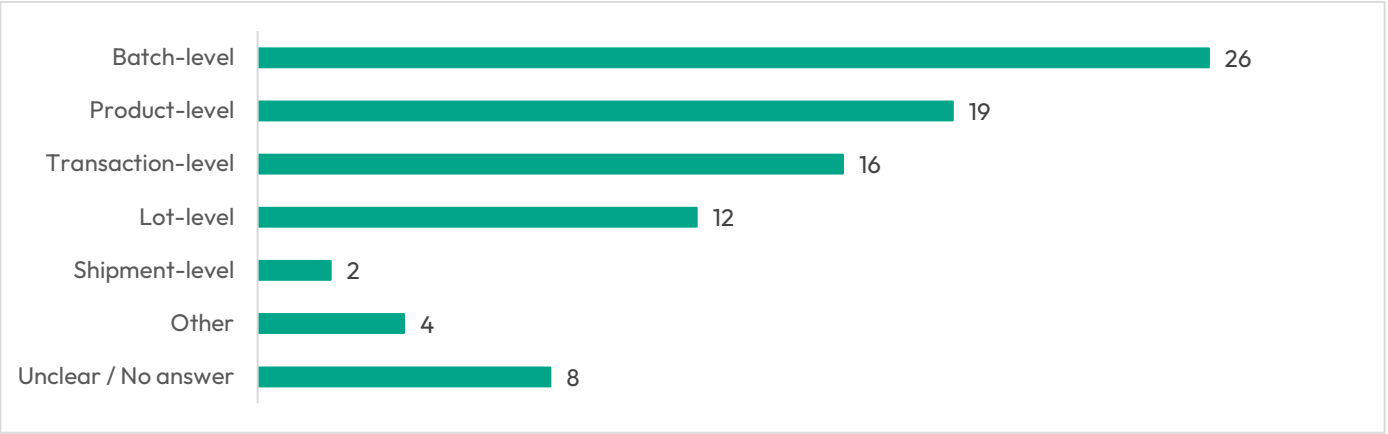
Below are the comments of that do not clearly fit a cluster.

Stakeholder feedback
Information
(translated) By searching for a suitable solution
Depending on the technological possibilities, blends may need to be considered the standard case, at least when using mechanical recycling. Otherwise, two different types of claims need to be used to distinguish them.

Through labels
One rule, a unique method of calculation
Only at the product level
Claims must be truthful, of course. I believe there is a way to do so while acknowledging that the product may not actually contain physical recycled material due to blending processes. There will be legal issues with making these claims, so those would need to be resolved regionally.
(translated) Give it more importance
This needs to be developed separately

Traceability and Recordkeeping

Question 20: What level of traceability is necessary?

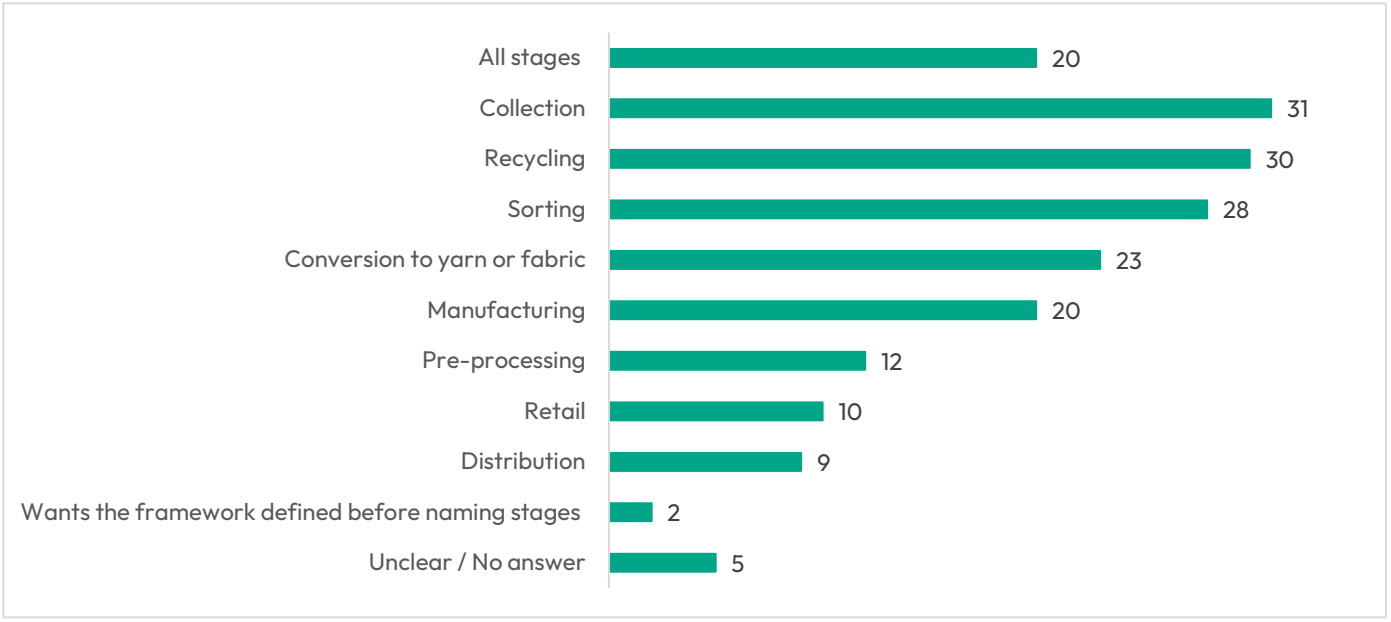


Below are the comments of those responded “Other”.

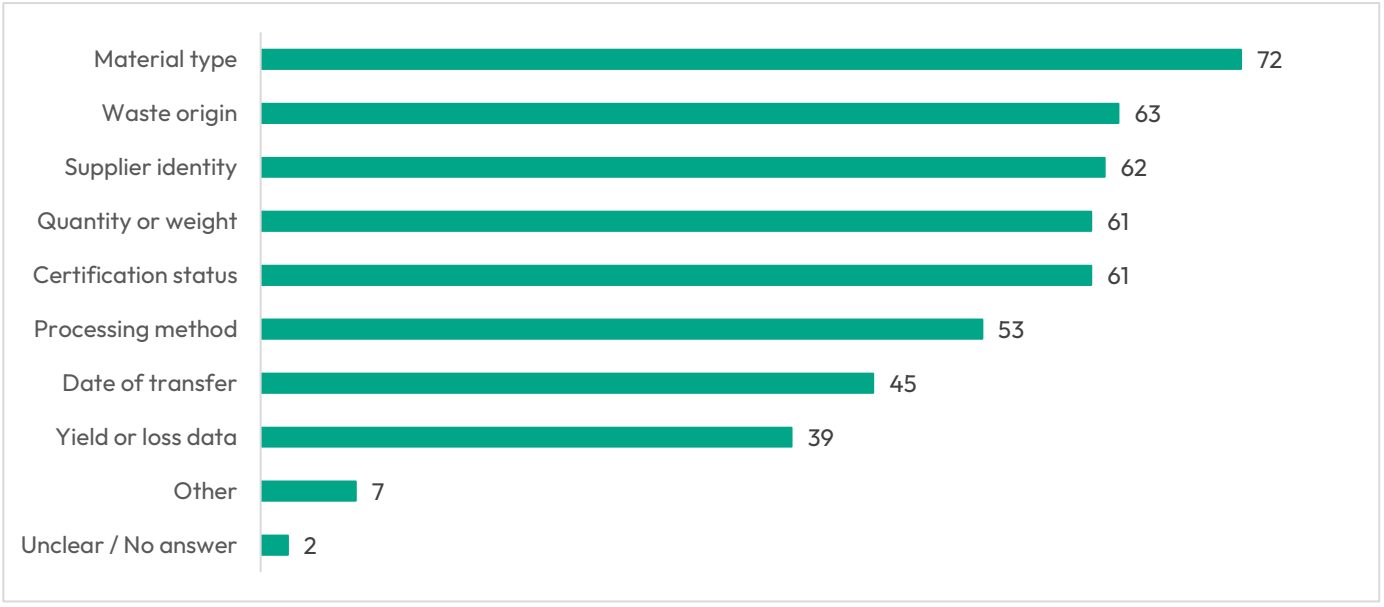
Stakeholder feedback
Traceability throughout the chain
Batch-level, Transaction-level, Product-level (for finished consumer-facing products)
All of them
Traceability throughout the chain
The required level of traceability should depend on the type of recycled claim being made, but in general, a credible textile recycling system needs end-to-end traceability. This should include tracking from the collection of discarded garments and recycled feedstock, through sorting, processing, fiber production, yarn, fabric, and finally the finished product. Key elements should include: - Verified origin and type of recycled materials - Chain-of-custody documentation at each stage - Digital identification systems such as Digital Product Passports or smart tagging - Accurate records of recycled content percentages - Independent verification and auditing. Without strong traceability, recycled content claims can easily lose credibility and create risks of greenwashing. The future of textile recycling requires a transparent, data-driven system where every material has a verified history.

Question 21: Which stages of the supply chain most need mandatory recordkeeping, and why?

The responses below are grouped by underlying position, since this was an open-text question with no fixed answer choices. Please find the original comments in the Annex.



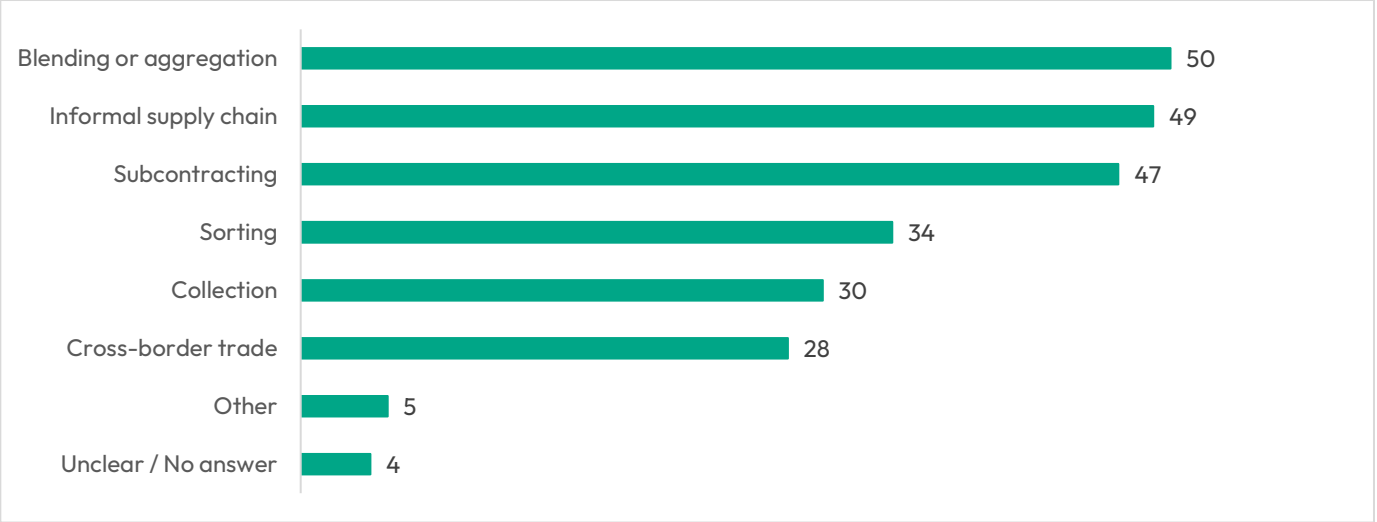
Question 22: What minimum data fields should be recorded at each handoff?



Below are the comments of those responded “Other”.

Stakeholder feedback
Batch/lot number
recycled-content %
Pre-consumer/post-consumer classification
Follow ISCC rules or alike
quantity better than weight
Depends on product, but quality should also be considered.
All named above

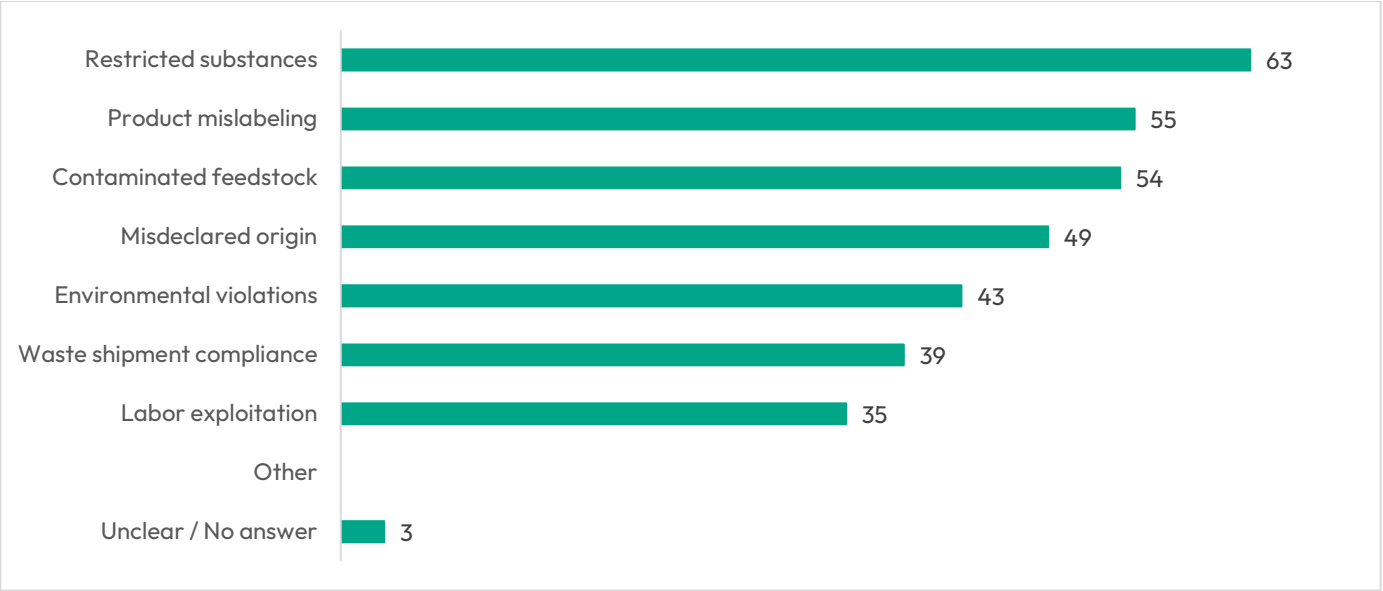
Question 23: Where are the greatest traceability risks?



Below are the comments of those responded “Other”.

Stakeholder feedback
Chemical recycling stages
Mixed dyed garment waste
In-house recycling
Fraud claims
Collection and sorting for non-EU countries
Knowledge and critical thinking

Question 24: Which regulatory risks are most relevant?

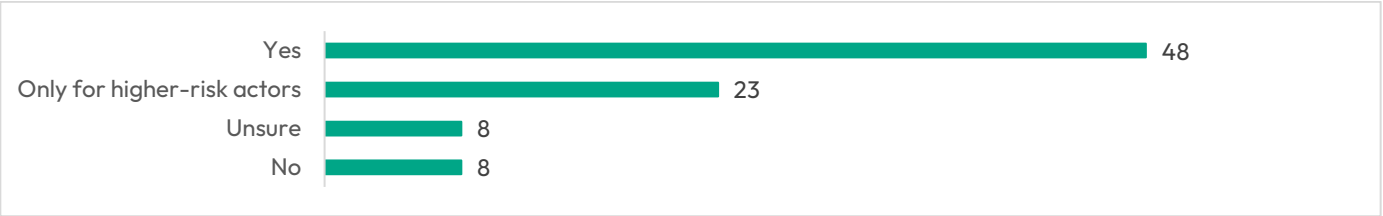


Below are the comments of those responded “Other”.

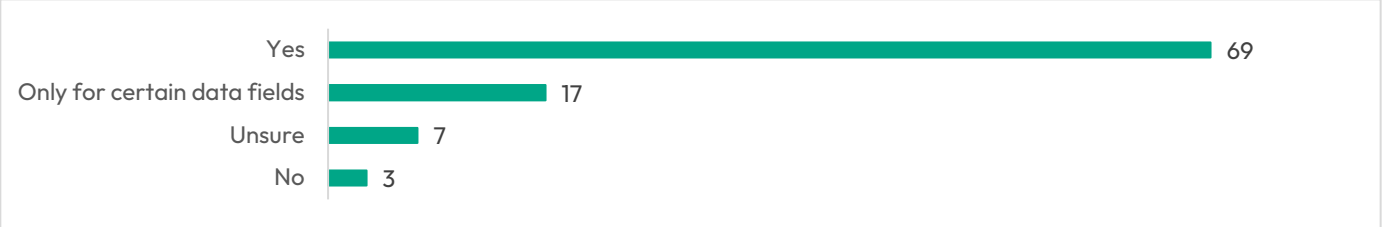
Stakeholder feedback
The questionnaire appears to assume certain regulatory approaches rather than first assessing whether they are technically, economically and legally feasible. In our view, greater emphasis should be placed on product conformity, economic feasibility and practical implementation before drawing conclusions on specific policy measures.
REACH Compliance
Social and environmental compliance on factory level is very relevant but done via other certification
In a circular economy the origin becomes the economy and therefore useless

Regulatory Alignment and Risk Management

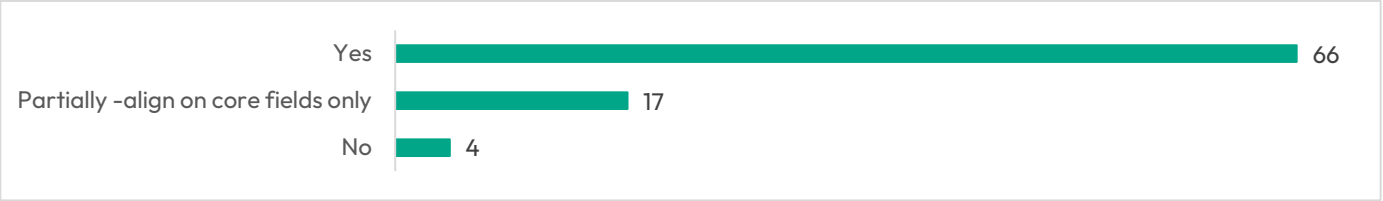
Question 25: Should explicit due-diligence requirements be included for recycled material sourcing?



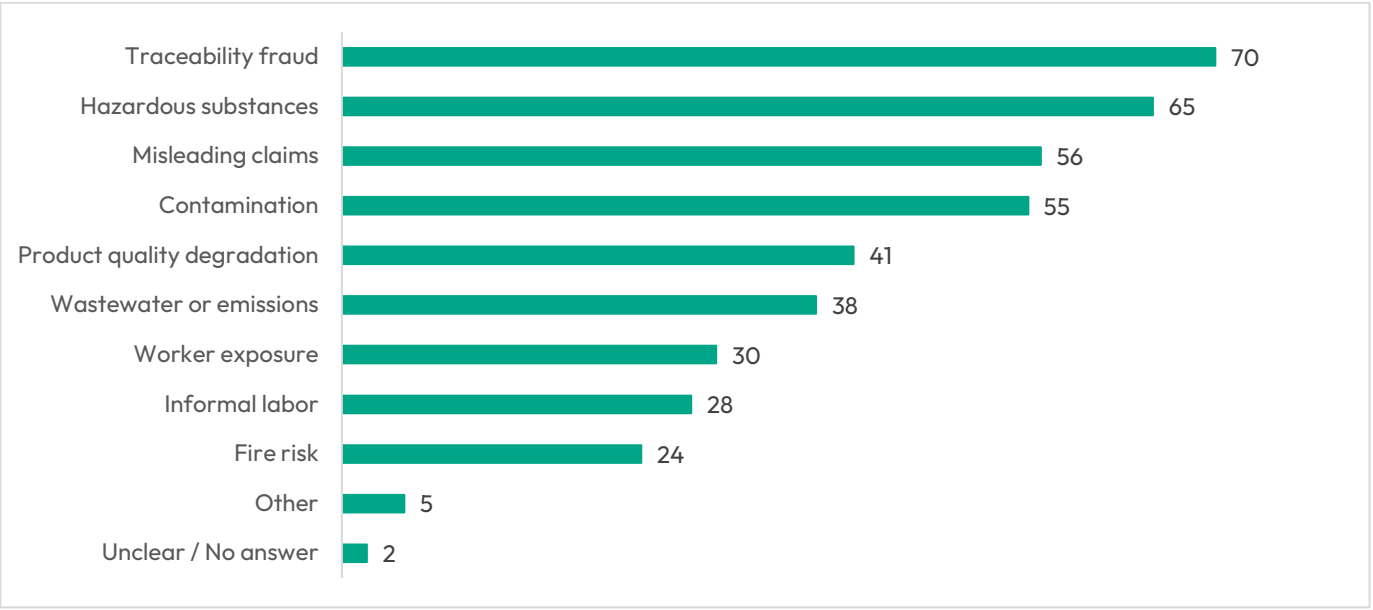
Question 26: Should chain-of-custody and testing data be structured so it can directly support Extended Producer Responsibility reporting obligations?



Question 27: Should recycled-content data models be designed to align with Digital Product Passport requirements?



Question 28: Which risks should be explicitly addressed?



Below are the comments of those responded “Other”.

Stakeholder feedback
Microplastic release
Micro plastics releases
Costs and Economic Implications
All are relevant but can be done/are done via other certifications, on factory level
Recycled products derived from post-consumer textile waste should comply with European social and environmental standards. Therefore, informal labour practices should not be permitted.

Question 29: What is the single biggest risk that any future approach to recycled textile verification system must avoid?

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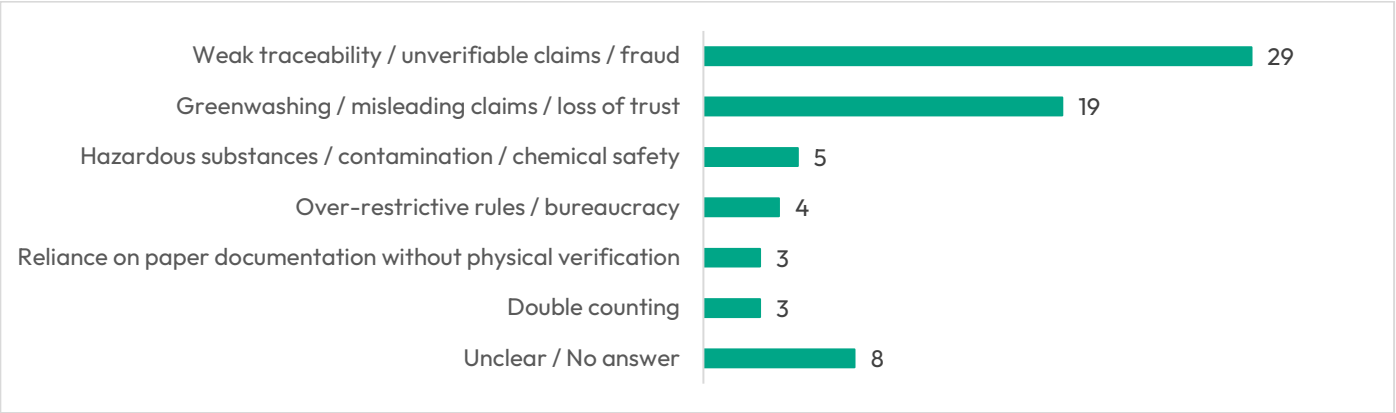

Question 30: Are there any legal, technical, or policy issues not covered above that you would like to highlight?

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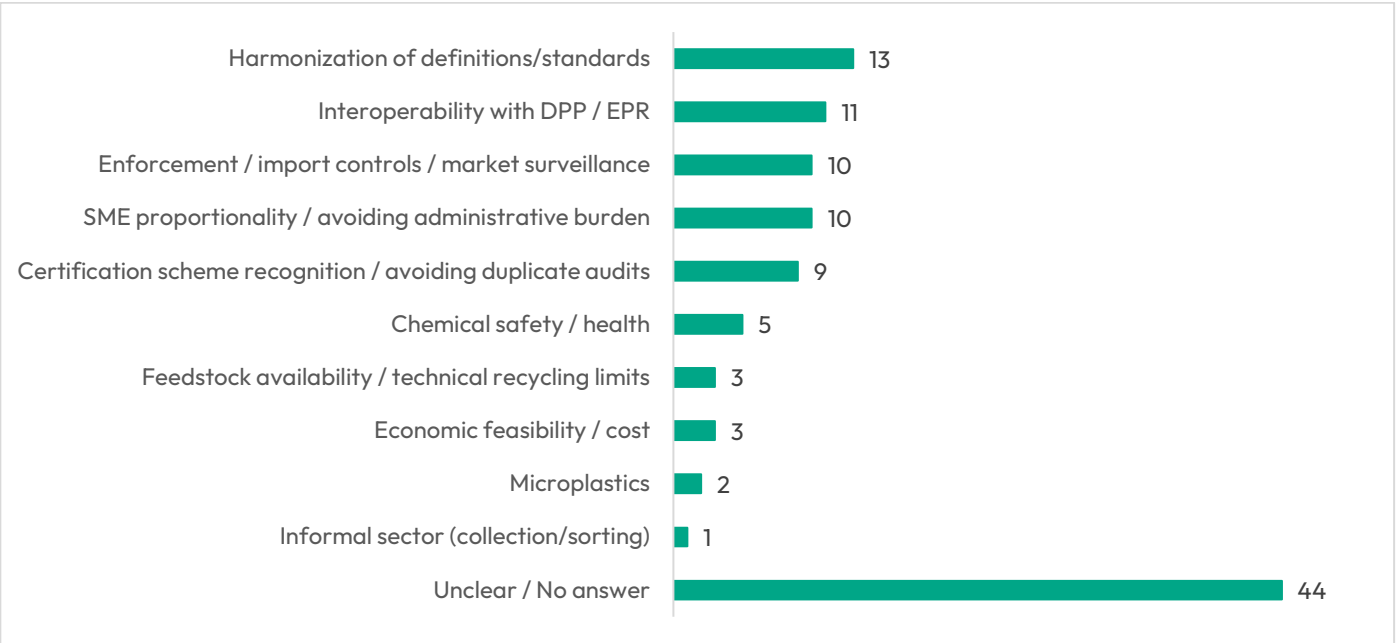

Annex – Original Comments

Question 3: How should recycled material be defined for textile applications?

Stakeholder feedback
Please stick with the official ISO Definition.
textile to textile
Recycled materials should be defined based on verifiable physical traceability, not just documentation. A credible definition must require the reconciliation of physical material flows with documented data. This ensures that the recycled content is real and traceable throughout the supply chain, rather than just being a result of fragmented or superficial record-keeping.
It should comes from scraps or reworked materials after a consumer consumption. Could also be unsold trims "remixed" to create a new product
Recycled materials can come from both close and open loop but it should be explicity stated where the recycled material is coming from (e.g. plastic bottles, pre-, post-consumer.)
" % of which fibre recycled from ... what waste (// feedstock e.g. plastic bottles, pre consumer textile waste, fishing nets)
Recycled material for textile applications should be defined as a material derived from waste streams which has been reprocessed and made into a new textile fiber, or product reducing they need for virgin raw materials.
For transparency and traceability purposes, the recycled content should be clearly identified according to its origin and should be supported by appropriate chain-of-custody documentation or recognised third-party certification, where applicable. For textile products, recycled content should refer to the actual recycled input incorporated into the textile material, excluding virgin material and, where relevant, process auxiliaries or other non-textile components.
Every form of pre-or post consumer waste which can be collected and after a recycling step be reused in an article shall be considered as eligible recycled textile input.
Material recovered from pre-consumer or post-consumer waste and reprocessed into new textile raw material, supported by traceability and verified recycled content.
Recycled material should be defined as material that is reprocessed into textile products from textile waste through mechanical or chemical recycling processes.
There are already external standards and norms which set a definition for recycled materials, like ISO 14021:2026 on environmental statements (https://www.iso.org/obp/ui/#iso:std:iso:14021:ed-3:v1:en, see 3.4.16) or the Global Recycled Standard - GRS (which is following ISO 14021 definitions). My suggestion would be that Oeko-Tex should follow those already existing definitions for consistency. Note that the definition of recycled material is quite broad, and refers to pre-consumer as well as post-consumer materials.
Material reprocessed from pre-consumer or post-consumer waste through a manufacturing process into new products
Recycled materials should be written on every garments . it should be traceable right from mill to end consumer.
si definisce quantificando la percentuale in peso di fibra recuperata rispetto al totale

Recycled material should be defined as textile raw material recovered from pre-consumer or post-consumer waste and reprocessed into new textile products through a traceable and verified recycling process. The definition should require clear chain-of-custody documentation and distinguish between mechanical and chemical recycling to ensure transparency, credibility, and product integrity.
Recycled material should be clearly defined as material recovered from waste streams and reprocessed into new textile products, with full traceability and verified chain-of-custody. The definition should distinguish recycled content from by-products and production residues that have never entered the waste stream, and should be supported by transparent documentation and independent verification.
Recycled material should originate from verified pre- or post-consumer waste, processed into new textile raw materials through traceable mechanical or chemical recycling, with complete chain-of-custody and transparent recycled content verification.
disposed material with quality value for the next cycle of textile applications
Recycled material for textile applications should be defined as any fiber, polymer, or textile material that has been recovered from pre-consumer/industrial scraps or post-consumer waste and reprocessed into a material suitable for use in new textile or non-textile products.
Standardized definitions based on existing recognized standards (example GRS, ISO). Its important that its harmonized globally with no room for interpretation.
Material recovered from pre-consumer or post consumer waste that undergo a verified recycling process and has been reprocessed into a usable raw material for the manufacture of new textile products. The origin and quantity of recycled material should be demonstrable through appropriate documentation and supply-chain traceability.
Clear, transparent and traceable. The supply chain and end consumer should know where it it from and how it has been recycled.
Organic coton est the base, no contamination,
Proper recyling of waste material of textile waste
Recycled materials should include a variety of pathways and not a singular definition. The circular economy will require many paths and options between industry and consumers. Post industrial, post consumer, mechanical, chemical, mass balance, etc are all going to be required to make the broader system work. How those things are communicated to consumers is a different problem but I don't think we should exclude particular waste streams or processes in the definition.
microfiber cloths
1) Mechanical or chemical, 2) pre or post consumer 3) Origin of feedstock source from agreed criteria (e.g. garment waste, fishing nets, bottles, industrial textile scrap - note: not exhaustive list)
Post-industrial waste Pre-consumer waste Post-consumer waste Soft waste Fiber-to-Fiber-Recycling
(translated) Any raw material (fibre, yarn, polymer or fabric) obtained from the reprocessing of pre-consumer or post-consumer waste that has been permanently diverted from the waste stream, whose compositional share is certified along the entire chain of custody, and which meets the same strict toxicological safety limits imposed on virgin material, guaranteeing the absence of inherited harmful substances (legacy chemicals).
Any material cut or sorted away in the first production process. Pre- and post consumer.

First with an international common regulation on traceability to coordonate ERP's and Fast Fashion waste regulation. Then with a systemic goal to achive a T2T recycling objective. Then working on overconsumption of fibers and mixed fibers prefered when possible. Some mixed fibers are necessary for instance in sport or medical textile industry.
See definition of recycle, recycling, recyclability, recyclable and recyclate in 3.5.3 - 3.5.6 in CEN / TC 248 Textiles - Circular economy for textile products - part 1 General principles and guidance. Just published. Recyclate = resources resulting from recycling of wast that ceased to be waste and can be used for the manufacturing of new articles or products.
Recycled material for textile applications should be defined as material that has been recovered from the waste stream and reprocessed into a new raw material for textile production.
In recyling process the minimal contamination of various fibre or materials was unavaoidable. Getting a perfect composition was nearly immpasible in standard methods. For that we have to do chemical process to remove impurities. So we can have have the composition which is more than 5% in the recycled materials.
Pre-consumer and post-consumer are already in use and the wordage is suitable
It should follow current industry standard or certifications definitions for consistency.
Post-consumer + Subcategory Pre-consumer + Subcategory Subcategory: For example: Textile-to-Textile, Production scrap or other source (for example PET) -
Material that was used before and that would otherwise be destroyed. The origin of the material should be textiles, not other sources, which means i.e. no recycled PET bottles.
material diverted from the waste stream during manufacturing, such as eligible textile production waste, cutting waste or other manufacturing waste. However, routine rework, regrind or scrap that is simply reused within the same manufacturing process does not qualify.
It should be detailed on which kind of recyclage it is, pre or post consumer.
Whitch origin of recycle? Pré ou post consumer
Recycled / non recycled should be fine
Reuse the remaining and wastes to other type of products like floormat and recycled bags
All pre- and post-consumer materials that can be recovered and can be reused in any way.
It should be defined for exactly what it is: what the fibre is or contains, any treatments it has had, whether it is treated with any chemicals or other potentially toxic treatments.
The definition should follow EN ISO 14021:2017 (ISO 14021:2016) definition of recycled materials; “Materials that have been transformed from waste into a final product or into a component for use in a final product through a manufacturing process”. And then it should be specified what types of feedstock that is allowed.
Allergenic chemicals free is important
Unique naming and classification, measured / benchmarked on established references (same as Uster Statistics for fibers and yarns)
recycled material, in textile applications –n. specific resource that has been obtained after being made into a product or used, which is processed back into the original resource type o Note: Quality of the recycled material is important so that future recycling loops are possible. Contamination or toxic substances present in the feedstock can cause hazardous exposure in the recycled material.
According to EN standards
BY DNA techonologies & Soft ware programs to prevent fraud products
recycled materials should be defined as materials that are diverted from a waste stream, collected and reprocessed through a recycling process into a material suitable for use in a new textile product. The definition

should align with international recognized terminology such as ISO 14021 and clearly distinguish recycled materials from reuse, rework and routine in-process scrap recovery.
Pre-consumer (Post-industrial) Recycled Material Generated during manufacturing processes before reaching the consumer. Examples: Yarn waste Fabric cutting scraps Production rejects Spinning and weaving waste Post-consumer Recycled Material Generated after a product has been used by consumers and is discarded. Examples: Used garments Discarded household textiles Recycled plastic bottles converted into polyester fibres Textile waste collected from consumers
pre-consumer material or post-consumer material, or both, that has been reprocessed from recovered materialand incorporated into a product (according to ISO 14021)
Recycled material in textiles should be defined as post-consumer or post-industrial waste that has been reprocessed into fibers, yarns, or fabrics, maintaining traceability and certification under standards like GRS to ensure authenticity and sustainability.
It should be fixed and made into new products and not discarded as unusable material in the industry
Recycled matrial is now necessary to be use in any textile product so that post and pre consumer textile waste can be reduce and make final product more sustainable.
as precisely as possible
Recycled material is defined as material that has been extracted from a waste stream and then transformed into material, fiber, yarn, fabric, or another component used in a textile product through a manufacturing process. It must come from pre-consumer and/or post-consumer materials; it cannot include virgin materials.
Any workable definition must be paired with a corresponding evidence requirement — a definition without a verifiable chain of custody is a narrative, not an assurance. From a data infrastructure perspective, the definition should be precise enough that each element can be documented, timestamped, and independently verified at transaction level. BSV Association contributes to this from a traceability infrastructure standpoint, not as a textile science or chemistry expert.
Greater and Greener earth
(translated) Do proper selective sorting by material type

For textile applications, recycled material should be defined as: "Material that has been recovered from the waste stream and reprocessed into raw material, intermediate material, or finished textile products for reuse in manufacturing, thereby replacing the use of virgin resources." Recycled material may include: Pre-consumer (post-industrial) recycled material: Material diverted from the manufacturing process that would otherwise be disposed of as waste, excluding materials that are routinely reused within the same manufacturing process. Post-consumer recycled material: Material generated by households, commercial, industrial, or institutional users that has served its intended purpose and has been collected, processed, and recycled into new textile products. The recycled content should be traceable, verifiable, and supported by appropriate documentation or third-party certification (e.g., GRS, RCS, or other recognized certification schemes) where applicable.
Recycled material should be defined as material recovered from pre-consumer or post-consumer waste and r eprocessed into new textile products through mechanical or chemical recycling with full traceability and verification.
Recycled material should be defined narrowly as textile-to-textile (T2T) recycled content: material derived from textile waste and reintroduced into new textile products. This excludes open-loop sources such as recycled PET bottles, which should not count toward textile recycled-content claims, as they do not address the textile waste crisis and dilute the demand-pull effect that recycled-content targets are intended to create for textile waste specifically.
For textile applications, a recycled material should be defined as any material that has been diverted from the waste stream during or after a manufacturing process, or after its intended consumer use, and has been reprocessed into a new textile input (such as fiber, yarn, or polymer tape) via mechanical, chemical, or thermo-mechanical recycling pathways. Crucially, this definition must exclude internal rework, re-granulated scrap, or scrap materials generated within the exact same production line or extrusion process that can be directly reintroduced into the primary manufacturing cycle without further transformation. The definition must also align with standard statutory benchmarks like ISO 14021 to maintain global market interoperability.
Any change of intended use causing more efforts than pure re-design (exclusion of second hand or similar re-use)
material that has been recovered from waste and reprocessed into a new raw material
End-of-life materials that would otherwise be destroyed, thereby contributing to a global net energy loss.
Is the reprocessing of a material or product into a raw material for use in a new product.
As raw material and, or intermediate material for reuse or transformation
Textile should not be recycled for clothing use
Clearly, concise and understandable
Reconditioned (as with mobile phones)
Recycled material for textile applications should be defined as material that has been recovered from the waste stream and reprocessed into raw material, intermediate material, or a final textile product.
It is need several path and we have to make overlooking standard's in each path I would like to cooperate in this regards because our future depend on it

A definition of recycled material for textile applications should not only specify the origin of the material, such as pre consumer or post consumer waste, but should also reflect what can realistically be verified in practice. At present, there are no standardized, reliable and economically feasible methods to determine recycled content in many textile products, particularly for mechanically recycled cotton and complex material mixtures. Therefore, any legal definition should be linked to robust traceability and documentation requirements rather than relying on analytical testing of the final product. Without a practical and enforceable verification framework, recycled content requirements risk being difficult or even impossible to implement and verify.
Pre consumer recycled material for Clothing and Post consumer recycled material for Footwear and home furnishing.
Little late to Ask this now when TLR is on the way. But in general with international accepten terms
By placing it in the appropriate container so that it can be identified

Question 4: Which distinctions matter most when defining recycled material, and why? For example: pre-consumer versus post-consumer waste, textile-to-textile versus non-textile recycling, mechanical versus chemical recycling.

What matters most depends entirely on who's asking. Brands need transparency on recycled percentage and post-consumer split to avoid regulatory exposure. Mills need clear pathways, can they use mixed waste or only homogeneous material, and what testing will OEKO-TEX demand? NGOs need assurance that post-consumer waste is genuinely diverted from landfill and recycled into textiles, not downcycled. Auditors need defensible protocols; homogeneous feedstock is straightforward to verify, but mixed waste, which is how mills actually scale, demands enhanced testing and a higher audit burden. The core tension due to the current limited scalability of recycled production. using only homogeneous post-consumer waste where supply is limited and expensive is not an option. But mixed feedstock introduces contamination risk and auditor complexity. OEKO-TEX's answer must be tiered pathways. Accept both routes, but scale audit rigor accordingly. Require transparency on process type and cycle limits. This allows practical scale while protecting credibility against greenwashing. Different stakeholders have legitimate competing needs; guidance that ignores this satisfies no one.
Textile-to-textile versus non-textile recycling, followed by rgin blends versus fully recycled content and pre-consumer versus post-consumer waste.
The most critical distinction is between 'pre-consumer' and 'post-consumer' waste, as they require fundamentally different verification levels. However, these distinctions are currently obscured because the traceability chain is often broken at intermediate supplier levels, making it nearly impossible to reconcile physical material flows with documentation. Therefore, a credible definition must distinguish between these categories while mandating standardized, rigorous record-keeping to prevent the current fragmentation in the supply chain."
Honestly all of them are important and precious for a brand to chose the best textile possible Those information are not usually shared by the fabricant which makes it untrustworthy despite their Oekotex or GRS certifications
textile-to-textile versus non-textile recycling
pre-consumer versus post-consumer waste, textile-to-textile (closed loop) versus non-textile recycling (open loop) also the CO2eq emissions linked to the provenance of the recycling plant etc - not been recycled at the other corner of the world

The most important differences are: Pre-consumer vs post-consumer waste: indicates the waste origin and degree of circularity. • Textile-to-textile vs non-textile recycling: this refers to whether the materials are recycled within the textile loop or obtained from other industries. Mechanical versus chemical recycling: Impact on fiber quality, energy consumption and scalability. • Mixed vs homogeneous feedstock: affects recyclability and final material quality. • Virgin blends vs fully recycled content: clarifies the true recycled percentage and sustainability impact. These differences are important to ensure transparency, traceability and accurate sustainability claims.
The most important distinctions are pre-consumer vs. post-consumer waste, textile-to-textile vs. non-textile recycling, and recycled vs. virgin content. These distinctions clarify the origin, circularity and actual recycled content of the material, supporting transparency and traceability. Mechanical vs. chemical recycling is also relevant, but should not determine whether a material qualifies as recycled.
textile to textile to keep the waste in the original cycle and to reuse textile waste best homogeneous because of better quality
Pre-consumer vs. post-consumer waste, textile-to-textile vs. non-textile recycling, and mechanical vs. chemical recycling are the most important distinctions. They provide greater transparency, improve traceability, and ensure consistent and credible recycled-content claims.
The most important distinction is between pre-consumer and post-consumer waste, as post-consumer recycling generally provides greater environmental benefits and better reflects circularity.
The most important distinction is pre-consumer vs. post-consumer recycled content, as these categories are already defined in ISO 14021 and widely recognized across existing standards. Other distinctions, may be relevant for transparency and traceability, but should not determine whether a material qualifies as recycled.We recommend maintaining a broad definition of recycled material consistent with ISO 14021 and GRS, while using these distinctions only as optional disclosure categories.
Recycled materials should be written on every garments . it should be traceable right from mill to end consumer.
rifiuti pre-consumo vs post-consumo, riciclo tessile vs non-tessile, riciclo meccanico vs chimico, materie prime omogenee vs miste
From my experience, the most important distinctions are between pre-consumer and post-consumer waste, textile-to-textile versus non-textile recycling, and mechanical versus chemical recycling. These differences directly affect material quality, traceability, environmental impact, and recycled content claims. A clear definition should recognize these categories while requiring verified chain-of-custody and transparent documentation to maintain supply chain integrity and prevent misleading sustainability claims.
The distinction between pre-consumer and post-consumer recycled material is essential because they represent different environmental impacts and levels of circularity. Textile-to-textile recycling should also be differentiated from non-textile sources, as it better supports a circular textile economy. Furthermore, mechanical and chemical recycling should be recognized as complementary technologies with different characteristics, while mixed feedstocks require stricter traceability and quality controls. Clear definitions help ensure consistency, transparency, and consumer confidence.
The most important distinctions are pre- vs post-consumer, textile-to-textile vs non-textile, mechanical vs chemical recycling, and verified recycled content percentage. These improve transparency, traceability, quality consistency, environmental credibility, and prevent misleading sustainability claims.
pre-consumer versus post-consumer waste, virgin blends versus fully recycled content

Distinction between pre-consumer vs post consumer matters as there is much difference in the quality of the recovered materials, nevertheless, as post-consumer is much harder to achieve it provide more environmental benefits, it should be permited to have textiles of pre and post consumer mixed. Virgin blends and fully recycled content matters too as the recycled material percentage should always be transparently disclosed to avoid greenwashing.
It should be clearly defined on what is to be considered recycled and what is not. When it comes to post-consumer waste, what exactly is in the scope (display samples). What should be in the scope for pre-consumer waste (example: soft cotton waste (comber noil) not to be considered as recycled input).
I believe all distinctions are important to ensure transparent, comparable and supported by reliable supply-chain evidence.
Definitions need to be explained and an agreed definition used across the sector (and all countries).
From a chemicals standpoint it's going to be important to understand pre-consumer vs. post consumer because the risk profile is significantly different. Oeko-tex should view distinctions from a risk lens to determine important distinctions. Similarly this would point to mechanical vs chemical recycling processes as key distinctions.
craddle to grave cycle
All matter because they provide transparency about what the recycled material actually represents. Pre- versus post-consumer identifies the waste source, textile versus non-textile identifies the origin of the feedstock, and mechanical versus chemical identifies the recycling pathway. These distinctions should inform the claim but should not determine whether legitimate recycled material qualifies as recycled.
textile-to-textile versus non-textile recycling --> at the moment there are many labels with up to 100% recycling but there is no indication from which raw material it comes from e.g. from PET bottles
Pre vs. Post-consumo: Il post-consumo comporta un rischio ecotossicologico critico da inquinanti ereditati (legacy chemicals), richiedendo screening chimici di laboratorio molto più severi rispetto ai cascami industriali. Tessile-tessile vs. Non tessile: Solo il primo chiude realmente il ciclo della moda (closed-loop); il secondo (es. PET da imballaggi) importa nel tessuto additivi estranei e rappresenta un riciclo a ciclo aperto. Meccanico vs. Chimico: Il riciclo meccanico accorcia la fibra e non elimina i finissaggi chimici preesistenti; quello chimico depolimerizza la materia, azzerando il rischio tossicologico e restituendo purezza vergine. Omogenee vs. Miste: I flussi puri garantiscono un riciclo ad alto valore; le miscele (soprattutto con elastan) agiscono come contaminanti tecnici che impediscono il riprocessamento di qualità. Miscele vergini vs. 100% riciclato: L'integrazione con fibra vergine serve a compensare la debolezza meccanica della fibra riciclata, ma esige un controllo millimetrico del bilancio di massa per non falsare l'etichettatura ambientale.
Focus shall be on the atom effeciency, i.e. how many tons can be recovered, regardless of imported, within-EU, pre- or post consumer. "Homogeneous" is a chemico-physical definition, and not fitting in this context and political legally badly defined. Only measurable or CoC certified recycling percentages may be claimed. All current product safety standards continue to apply in regards to exposure to unwanted substances and contact-sensitive risk assessments.
process wise: Pre and post consummer, T2T vs non T2T and open vs closed loop fabric wise: virgin blend vs fully recycled is impossible so far if we want to avoid rebound effect such as poorest quality in fabrics, less durability and useless microfibers Product wise: there are educational points to work on such as the aesthetic of colors and plain fabrics

Post-consumer waste input (compositions) varies per batch. Restricted substances are unknown. Even for repeat orders/ NOOS stock. Testing every batch is time consuming, costly and data reporting (per yarn or fabric) becomes very complicated. Especially for smaller companies who do not have PLM-systems or alike. The DPP is still far away and is only useful to recyclers if the data stick with the garment.
For me the recycling waste should help clean the world from plastic, why post consumer matters the most.
pre-consumer and post-consumer waste was the major thing in recyed materials. As far as we concen, we may include the mechanical and chemical recycling because of hazardous chemical may present in the chemical process.
1.Pre-consumer vs. post-consumer – indicates the waste source and environmental impact. 2.Textile-to-textile vs. non-textile – shows whether fiber circularity is maintained. 3.Mechanical vs. chemical recycling – affects fiber quality, recyclability, and processing. 4.Homogeneous vs. mixed feedstock – determines recycling efficiency and output quality. 5.100% recycled vs. virgin blends – defines actual recycled content and supports accurate claims
Based on pending regulations it should include pre-consumer vs post as well as where the feed stock originates from (textile vs not).
Se answer no.11 Need to avoid production only to be used as RE in another product?
Pre consumer vs post consumer waste, textile to textile vs non textile and mechanical vs chemical recycling
Pré et post consumer versus chimique, mécanique
The goal is to provide technical details that could help bring education about the recycling processes involved and spot supplier's scam. Maybe different level for consumer or any industry member? All this have to encourage suppliers to include all types of feedstocks and test all kind of recycling methods in order to scale up recycling processes generally speaking.
Post-consumer means the reminants and wastes re-useing
"virgin blend versus fully recycled content " in order to avoid any green- washing attitude
It should be easy to understand what the fibre is and how it has been made. Fancy pseudo technical names and descriptions should be avoided.
Ir shouldnot matter as long as the final form should be declared as non- allergenic and conforms to norms as non-recycled textiles.
The origin should be included in the nomenclature of the material, but what matters in the end is the 'spinnability' and the (traced) content of recycled fibers vs virgin ones
The source of feedstock, the accounting/traceability procedure used (e.g., mass balance vs. one-to-one) and the type of recycling process are all important distinctions to make when defining a recycled material. For clarity and expanding the circular economy, feedstock from textiles being turned into new textiles is necessary. To trace these materials, the concept of one-to-one accounting is the clearest but may not be possible depending on the type of recycling process being used.
textile-to-textile versus non-textile recycling
pre vs post
the distinction between pre-consumer vs. post-consumer is critical & textile-to-textile vs. non-textile-to-textile feedstock is also important. These distinctions directly affect consumer understanding and claim accuracy. Recycling technology should also be traceable, but should not by itself determine whether a material qualifies as recycled.
The most important distinctions when defining recycled materials in textiles are those that affect environmental impact, traceability, performance, and certification claims.
pre-consumer versus post-consumer, virgin blends versus fully recycled content,

pre-consumer material versus post-consumer material textile-to-textile versus non-textile recycling
textile-to-textile versus non-textile recycling,
Almost all recycling material is important whether it is post/pre, chemical/mechanical and so on. Based on consumer demand and finished products suitability the recycle material select and use.
homogeneous versus mixed feedstock
(1) Pre-consumer vs. post-consumer - Yes, strongly recommend. (2) Textile-to-textile vs. non-textile - Yes, but as a separate category, (3) Mechanical vs. chemical recycling - No, may be classified separately, (4) Homogeneous vs. mixed feedstock - Yes for classification/traceability. May not be the basic definition, (5) virgin blends versus fully recycled content - May not be in definition, but for calculation purposes of recycled content.
From a traceability infrastructure perspective, the distinction that matters most is the one that creates the longest or most opaque chain of custody — which is typically post-consumer waste and mixed feedstocks. These are the pathways where the distance between the claim and the verifiable evidence is greatest, and therefore where tamper-evident, independently verifiable records add the most value. We leave the textile-science and quality-based distinctions to sector specialists.
Pre consumer wastes
(translated) Make seperations between the materials
Distinction Why it Matters Recommendation Pre-consumer vs. Post-consumer Post-consumer waste generally delivers greater environmental benefit because it diverts products from disposal after use. Pre-consumer waste may include manufacturing scrap that might already have been reused internally. Essential distinction. Report separately. Do not combine without disclosure. Textile-to-Textile vs. Non-Textile-to-Textile Textile-to-textile recycling supports a circular textile economy by keeping fibers in the textile value chain. Non-textile inputs (e.g., PET bottles) reduce virgin plastic use but do not close the textile loop. Essential distinction. Declare the source material. Mechanical vs. Chemical Recycling Mechanical recycling generally consumes less energy but often shortens fiber length and may reduce quality. Chemical recycling can restore fiber quality and handle more contaminated feedstock but typically requires more processing and chemicals. Important distinction. Identify the recycling process used. Homogeneous vs. Mixed Feedstock Single-material feedstocks (e.g., 100% cotton) are easier to recycle into high-quality fibers. Mixed-fiber feedstocks (e.g., cotton/polyester blends) are more difficult to separate and often yield lower-quality outputs unless advanced technologies are used. Important distinction. Disclose feedstock composition where feasible. 100% Recycled vs. Virgin/Recycled Blends A product containing 20% recycled fiber is fundamentally different from one containing 100% recycled fiber. Blending affects environmental claims and product performance. Essential distinction. State the exact recycled-content percentage by weight. Closed-loop vs. Open-loop Recycling Closed-loop recycling returns material to the same or equivalent product (e.g., cotton garment to cotton yarn). Open-loop recycling converts material into different products with different applications. Closed-loop generally better supports circularity. Recommended distinction for sustainability reporting. Certified vs. Non-certified Recycled Material Third-party certification increases confidence in recycled-content claims and chain-of-custody integrity. Strongly recommended. Reference recognized schemes such as GRS or RCS where applicable. Internal Reuse vs. True Recycling Material reused directly within the same manufacturing process (e.g., edge trim immediately fed back into production) is generally not regarded as recycled content under most international standards. Essential clarification. Exclude routine internal process reuse from recycled-content claims. Recommended Definition

Recycled material is material recovered from the waste stream that has been reprocessed into raw material, intermediate material, or finished textile products for use in new manufacturing, thereby replacing virgin material. Recycled material should be classified and disclosed according to: Source: Pre-consumer or Post-consumer Origin: Textile-to-textile or Non-textile-to-textile Recycling process: Mechanical or Chemical Feedstock type: Homogeneous or Mixed Recycled content: Percentage of recycled material by weight, distinguishing fully recycled products from virgin/recycled blends Circularity: Closed-loop or Open-loop recycling (where applicable) Verification: Third-party certified or otherwise traceable through documented chain of custody Priority Ranking If only a few distinctions can be required, the most important are: Pre-consumer vs. Post-consumer Percentage of recycled content (100% vs. blended) Textile-to-textile vs. Non-textile-to-textile Mechanical vs. Chemical recycling Homogeneous vs. Mixed feedstock Certification and chain of custody Closed-loop vs. Open-loop recycling This approach aligns well with international textile sustainability frameworks such as ISO 14021, the Global Recycled Standard (GRS), the Recycled Claim Standard (RCS), and emerging textile circularity initiatives.
The most important distinctions are pre-consumer vs post-consumer waste, textile-to-textile vs non-textile recycling, and mechanical vs chemical recycling. These distinctions improve transparency, traceability, environmental impact assessment, and credibility of recycled-content claims
What matters most is to address Europe's post-consumer textile waste problem. Therefore, the ability to identify whether a product is made from closed-loop, post-consumer or post-industrial waste, and to trace the origin of that waste. The other distinctions matter primarily as far as they serve this core traceability objective. - Pre-consumer vs. post-consumer waste: Post-consumer textile waste should be prioritized and, where possible, reported separately, since it represents the primary strategic challenge (13.3 Mt of the EU's 15.2 Mt of textile waste in 2025 is post-consumer, BCG report, March 2026) and the segment least served by existing recycling routes. - Textile-to-textile vs. non-textile (open-loop) recycling: Only closed-loop, textile-to-textile recycling should count toward textile recycled-content obligations; open-loop inputs (e.g., bottle-derived rPET) should be excluded or reported under a separate category to avoid diluting genuine T2T demand. This closed-loop / open-loop distinction, together with the origin of the waste feedstock, is in our view the most material one for defining recycled content, more so than the recycling technology used. - Mechanical vs. chemical recycling: This distinction is of secondary relevance. What the end product needs to disclose is the type and origin of the waste used, not the process by which it was recycled the process is largely a derivative, technical consequence of the feedstock (mechanical recycling generally requires more homogeneous feedstock, whereas chemical recycling, e.g. depolymerization–repolymerization, can accept blended and lower-purity textile streams, including polycotton, which represents a significant share of collected and sorted post-consumer textile waste). In other words, recycling technology is indirectly suggested by the type of waste used and

does not need to be a stand-alone defining criterion. - Homogeneous vs. mixed feedstock: Given that blended fibres make up a substantial share of the addressable post-consumer stream, any definition of recycled content must explicitly accommodate mixed-feedstock chemical recycling routes rather than assuming single-fibre inputs. - Virgin blends vs. fully recycled content: Products combining virgin and recycled material should be required to disclose the precise proportion of recycled content, as well as its origin (closed-loop post-consumer/post-industrial waste), rather than relying on generic "recycled" claims, to preserve consumer trust and enable enforcement.
A. Pre-Consumer vs. Post-Consumer Waste Why it matters: This distinction measures the true circular impact of a product. Post-consumer waste actively diverts materials from landfills or incineration at the end of their useful life. Pre-consumer waste captures manufacturing byproducts (like spinning waste or yarn offcuts). Recognizing both is important, but post-consumer claims must carry higher regulatory credit and consumer transparency because managing post-consumer waste presents significantly higher collection, sorting, and contamination challenges. B. Textile-to-Textile vs. Non-Textile Recycling Why it matters: This distinction is critical for long-term industry sustainability. A massive volume of recycled polyester textiles currently relies on non-textile feedstocks like clear PET beverage bottles. Relying heavily on open-loop, non-textile recycling masks the textile industry's own waste crisis. True circular economy metrics must differentiate and incentivize textile-to-textile closed-loop systems to build self-sustaining textile supply chains. C. Mechanical vs. Chemical Recycling Why it matters: This distinction dictates material performance and lifecycle limits. Mechanical recycling physically tears or extrudes materials, shortening fiber lengths or degrading polymers (e.g., thinning polypropylene tape walls), which limits the number of times it can be recycled. Chemical recycling breaks materials down to the monomer level, eliminating impurities and restoring the polymer to virgin-grade quality. Tracking this allows high-performance technical applications to properly manage structural safety factors.
Pre-consumer vs. post-consumer waste because post-consumer materials generally present greater collection, sorting, contamination, and traceability challenges, making verification more critical.
pre-consumer versus post-consumer waste, alerting consumers to waste that has already been used
1) Difference between: Re-use and Recycling is in the beginning needed as it is often mixed up with recycling processes. 2) for communication it is more important to know if it is textile to textile recycling rather than having other materials (e.g bottles) taken due to the environmental impact. 3) Pre-or post consumer waste is only important for testing purposes but not for a consumer. 4) Content of recycled material is important to give the consumer the choice of choosing this material. 5) Feedstock is important for controlling/auditing but not for the consumer and external communication 6) chemical/mechanical recycling has influence on testing.
Like for plastic and paper as r fabric. All materials used for the fabric should be sorted and reuse
Any recycled textile has hazardous material issues. Contact dermatitis, backed by evidence, has been linked to recycled fibers. Plus the lack of tracability and the fact that this is impossible to proceed to a strong verification
Post consumer, textile to textile and
Mechanical versus chemical recycling. Because it is essential to know which chemicals are used!
The most important distinctions when defining recycled material for textile applications are those that influence environmental impact, circularity, traceability, and material quality.

First separations automation Secondly customer's path to encourage them to recycle their garments to new recycle garments Thirds manufacturer path to make garments more traceable and transparent Fourth control ingredient production capacities and prevent over production in the first step
Not all distinctions are equally relevant from a regulatory and practical perspective. The most important distinction is between waste streams that are genuinely circular and those that simply recover production losses. A clear differentiation between pre consumer and post consumer waste is therefore essential, as these streams differ significantly in terms of availability, recycling complexity and environmental benefit. The distinction between textile to textile recycling and the use of recycled materials from other sectors should also be reflected, as these pathways contribute differently to closing the textile loop. By contrast, differentiating between mechanical and chemical recycling is less relevant for defining recycled material itself, provided that both processes produce secondary raw materials meeting the same quality and traceability requirements. In addition, there is currently a significant lack of reliable data on which recycled feedstocks are actually available, in what quantities, at what quality and at what cost. Without this information, it is difficult to set realistic regulatory requirements or assess whether specific distinctions are meaningful and scalable in practice. Most importantly, any distinction included in legislation should be verifiable in practice. Current analytical methods cannot reliably distinguish or quantify many types of recycled content in textile products, particularly for mechanically recycled cotton and complex material blends. Introducing categories that cannot be verified with robust and economically feasible methods would create significant enforcement challenges and legal uncertainty.
versus mixed feedstock, virgin blends versus fully recycled content. This both matter most as we could not have any traceability or control on recycled content used as raw material.
Depends on what we are talking about. On carelabel or in a tech pack or material specifikation.
(translated) Pre-consumer and post-consumer waste

Question 5: Which feedstock types should be excluded or restricted, and why?

Stakeholder feedback
Pre-consumer PET bottles should remain restricted. More critically, post-consumer PET bottles should face the same restriction in the long term, as they divert material from a functional bottle-recycling loop. While PET bottles currently represent the majority of textile recycling supply, accepting them masks a logical problem: textile recycling is not circular when it diverts material from its existing closed loop. Materials without clear traceability should be excluded entirely. If the feedstock source, treatment history, or chemical composition cannot be documented, the contamination and liability risk exceed any recycling benefit.
The waste hierarchy should be respected. Reusable textiles, whether originating from post-consumer textiles or unsold stock, and regardless of where they are reused, should be excluded from this scope, as materials should be kept at their highest value for as long as possible. Removing reusable textiles from the value chain results in the loss of the resources invested in their production and creates a need for the manufacture of new garments, leading to additional environmental impacts.

Materials that lack reliable chemical history or those from contaminated streams should be restricted. Specifically, textile waste with unknown chemical additives or non-compliant dyes must be excluded, as they jeopardize the safety and quality standards of the final recycled product. Without rigorous chemical screening, these inputs undermine the credibility of the entire recycling process."
The ones creating poor quality materials, that are decomposing with micro plastics everywhere
If we want a faster transition towards circular economy, we have to use all resources possible and do not have the priviledge to exclude something.
open loop from plastic bottles, because that feedstock belongs to the plastic bottle industry.
Feedstocks of unknown origin, of poor traceability or high contamination should be limited or excluded to ensure quality, transparency and real circularity.
Feedstocks should be restricted where their origin, waste status or composition cannot be reliably verified. We also consider that post-consumer non-textile materials, such as PET bottles, should be restricted for textile applications where they are suitable for closed-loop recycling in their original application, in order to prioritise higher-value circular loops.
Feedstocks with unclear origin, poor traceability, or a high risk of contamination should be restricted or excluded. Materials that cannot be reliably verified as recycled, or that do not support genuine circularity, should not be considered recycled content.
Feedstock containing hazardous substances, excessive contamination, or unknown origin should be restricted or excluded because they can compromise product safety, traceability, and the credibility of recycled-content claims.
Feedstocks with unknown or insufficiently traceable origin should be restricted. In addition, mechanically recycled post-consumer feedstocks with a high contamination risk may require additional safety measures. We recommend that eligibility be based on traceability, source verification, and safety, rather than solely on whether the material is pre- or post-consumer. Materials recovered from unknown environmental sources should not automatically qualify as recycled content without appropriate verification.
the materials contaminated with hazardous chemicals (e.g., medical or sanitary waste, and heavily soiled post-consumer items, primarily to prevent chemical, biological and hygiene risks, and to ensure compliance with safety regulations
Chemical addition type of feedstock should be avoided to secure environment.
(translated) Virgin fibres derived from petroleum (polyester, nylon, acrylic) and cotton from conventional agriculture should be excluded, owing to their high consumption of resources.
Feedstock with unknown origin, hazardous contamination, or without verified traceability should be excluded or strictly restricted. Mixed waste streams that cannot be properly identified or separated should also be limited, as they compromise product quality, safety, recyclability, and the credibility of recycled content claims. Clear chain-of-custody and material verification should be mandatory for all recycled feedstock.
Feedstocks with unknown origin, insufficient traceability, or inadequate documentation should be excluded. Materials contaminated with hazardous substances or mixed waste streams that cannot be reliably identified should also be restricted. Production residues that are routinely reused within the same manufacturing process should not automatically qualify as recycled content, as this may overstate circularity. Clear restrictions are necessary to maintain credibility, prevent misleading claims, and ensure confidence in recycled textile products.
Exclude contaminated, hazardous, illegally sourced, mixed-unknown, or non-traceable feedstocks. Restrict production scrap that never entered the market unless clearly disclosed. This protects product safety, supply chain integrity, and consumer confidence in recycled textile claims.
intended waste(post industry), items with resale/upcycle value(part of pre-consumer), chemical contamination(post-consumer)

Feedstock type that should be excluded or restricted could be textiles materials is with the unclear origin, as there could be greenwashing.
Feedstock with harmful substances, when levels go above the legal limits in the final product. Dirty, wet feedstocks. From the recycled claim perspective, pre-consumer waste which can be fed directly into same production line, without further processing, should not be considered as recycled (example: soft cotton waste (comber noil)
Feedstocks that are hazardous and their origin, safety, composition cannot be verified reliably. Also the mixed waste should be subject to stricter requirements because it increase risk of contamination, unknown composition. the approach should be risk based.
Feedstock that can not again be recycled and that which poses increased risk to the environment. Feedstocks that degrade during use and those that further compound the problem e.e.g microfibre shedding.
Chemical dyes, heavy metals, others toxines, plastiques (nylon, polyestere, etc.)
None unless they pose a consumer (or worker) health and safety risk that can not be properly mitigated. That being said, there are likely situations where the term "recycled" might not apply. If a factory is just re-circulating internal scraps...then probably not, but I don't have a strict way of defining that.
Exclusions should focus on whether the material is genuinely waste. Material deliberately produced to create a recycled feedstock should not qualify. Material routinely returned directly into the same production process without a genuine recycling step should also be excluded. Feedstocks presenting unacceptable chemical, environmental, social, or regulatory risks should be restricted unless those risks are adequately controlled.
PET-bottles --> should remain in the bottle recycling circle
(translated) Streams contaminated with legacy chemicals (Total exclusion in mechanical recycling): these are excluded to prevent the intact transfer, into the new garment, of toxic substances or those banned under the RSL/MRSL lists inherited from previous cycles. Blends with elastane or coatings (Severe restriction): these act as critical contaminants that degrade shredding machinery and prevent high-value reprocessing, weakening the yarn. Non-textile streams (open-loop) and exhausted fibres (Restriction and control): the former due to the presence of industrial additives not tested for skin contact; the latter due to the critical fibre-length reduction that compromises the mechanical strength and durability of the fabric.
None should be excluded, for a biodiversity, climate and environmental safety focus shall be on the atom effeciency. We shall start with all possibilities, and only measurable or CoC certified recycling percentages may be claimed.
post consumer textile waste - see above Eventhough we do acknowledge the strenght of Oekotex 100 or STEP certification. A smart compromise would help eg info of post-consumer textile waste via the labelling and/or a special Oekotex xyz certificate
Pre consumer .
In my opinion, the homogeneous feedstock will be practicaly difficult to produce for mass production. It may affect the availabity also.
Internal process scrap – not true waste if reused within the same process. Virgin production residues – may overstate recycled content. Contaminated or hazardous waste – unsuitable for safe textile applications. Untraceable feedstock – cannot verify recycled origin or claims. Mixed materials without validated separation – reduces quality and recyclability
China has excluded post industrial waste that has not been altered this should be reviewed.
Material produces only to be used as a source for RE material. To use production waste is good as long as there is no overproduction just to make more material to be used (as the price is higher for RE material).

PET bottles should be banned in the future - All circular sectors should be separate (Textile-textile; PETbottle-Petbottle etc) until it no longer can be used in the sector.
Bottles should be excluded, as that will take out the material from bottle to bottle recycling and mainly lead to material being destroyed after first textile use instead of further recycling.
Textile-to-textile keeps textile resources in the textile loop. A textile converted into another product (e.g., insulation) is generally a different recycling pathway.
All the materials without tracability as it can envolved chemical problems.
Origin of recycled material = traçability
No feedstock exclusion but we should have a traceability. That is the only way then to calculate the environmental cost of recycling for each one and then prioritize one over the other.
Non textile recycling
Post-consumer materials, such as upholstery fabrics, which lose their chemical and physical properties at the end of their useful life
Pre-consumer textile waste. The risk is otherwise that new and fuctional textiles end up as feedstock for new materials.
Never thought of it, maybe ones with gluten but belşeve could be got rid off sonehow (i am a cosmetic formulation chemist)
Theoretically: none
In order to make circularity claims, feedstock should be from textile materials, not plastic bottles or other types of plastics. Making circularity claims using such non-textile feedstocks is misleading, and should be restricted, because the number of circular life cycles becomes limited and future quality is reduced when plastic bottles are converted into feedstocks for «recycled» textile fiber or yarn.
Different types
if feedstock from routine production scrap/rework/regrind which requires the same process; or deadstock, overproduction, unsold finished goods, returns, defective, mixed/unknown-origin waste which cannot identify origin/category.
Depends on demands, it will vary
None. Because any material derived from scrups and that is recyclable should be accepted.
Feedstocks like mixed municipal waste, hazardous chemical residues, contaminated textiles, and non-traceable sources should be excluded or restricted because they pose safety, quality, and traceability risks and undermine sustainability goals.
The ones that are made with the material that is not breathable for example Lycra and many others because they will cause more issues for the customers
There should not be any exclusion and restrictions in recycling material because recycling process gives new life to feeded raw material and make suitable consumables raw materials to the users and their products.
Pre-consumer textile waste should be restricted as it could be due to continued over-production and poor design decisions for example. It should first be diminished as much as possible, then what can't be avoided can be reused / recycled. Recycling is not the main solution here and shoul not be the only one in application. Pre-consumer textile waste has too be explained and justifed with the most transparency and with owned responsibillity to be relevant as real waste.
Following stream may be excluded or restricted - hazardous chemistry, contamination, or material complexity makes safe, high-quality recovery impractical. These may include PFAS-containing textiles, Textiles containing hazardous flame retardants, Biocide/antimicrobial-treated textiles with unknown chemistry, Textiles contaminated with oils, solvents, pesticides, bodily fluids or other hazardous substances, Medical/clinical textiles with unknown contamination among others.

Post consumer, because it almost dead by quality
Polyester
When defining recycled material for textile applications, certain feedstock types should be excluded or restricted to ensure environmental integrity, traceability, product safety, and credible recycled-content claims. Recommended Exclusions and Restrictions Feedstock Type Exclude or Restrict Rationale Virgin material Exclude Virgin materials are not recycled and should never contribute to recycled-content claims. Internal process scrap (same-process reuse) Exclude Materials that are routinely reintroduced into the same manufacturing process (e.g., edge trim, spinning waste immediately reused) do not constitute recycled material under internationally recognized definitions such as ISO 14021. Off-specification products reworked within the same process Exclude Reprocessing products without leaving the manufacturing process is normal production practice, not recycling. Hazardous or contaminated waste Exclude unless effectively decontaminated Contaminants such as hazardous chemicals, oils, heavy metals, asbestos, or biological contaminants may compromise product safety and regulatory compliance. Unknown or unverifiable feedstock Exclude Feedstock without documented origin or chain of custody cannot support credible recycled-content claims. Illegally sourced or unauthorized waste Exclude Materials obtained through theft, illegal dumping, or regulatory violations should not qualify. Mixed municipal waste without adequate sorting Restrict Such feedstock often contains contaminants and inconsistent material quality, requiring validated separation and quality control. Composite or multi-material feedstocks Restrict Cotton/polyester blends and laminated textiles are difficult to recycle effectively unless suitable separation technology is demonstrated. Medical or hazardous protective textiles Restrict or Exclude These materials require validated decontamination before reuse due to health and safety risks. Post-consumer textiles containing restricted substances Restrict Older textiles may contain substances prohibited under current regulations (e.g., certain dyes, PFAS, flame retardants, heavy metals). Appropriate testing is necessary before recycling. Mixed plastic waste of unknown composition Restrict Polymer incompatibility may reduce product quality and create processing challenges. Material identification and sorting should be verified. Non-textile feedstocks (e.g., PET bottles) Allow with clear disclosure Bottle-to-fiber recycling reduces virgin plastic use but does not support textile-to-textile circularity. The origin should be transparently declared. General Eligibility Criteria To qualify as recycled feedstock, the material should: Originate from pre-consumer or post-consumer waste that has genuinely entered the waste stream. Be traceable to its source through documented chain of custody. Meet applicable quality and safety requirements for the intended textile application. Comply with all relevant chemical and product safety regulations. Be processed using a controlled and documented recycling process. Recommended Policy Statement The following materials shall not be considered recycled feedstock: virgin materials, internal process reuse, routine manufacturing scrap returned directly to the same production process, off-specification materials reworked within normal manufacturing operations, hazardous or contaminated waste that has not been appropriately treated, and

materials with unknown or unverifiable origin. The following feedstocks may be accepted subject to documented controls: post-consumer textiles, pre-consumer textile waste, non-textile recycled polymers, mixed-material feedstocks, and contaminated materials that have undergone validated sorting, decontamination, and quality assurance processes. Their source, recycling method, and chain of custody shall be fully documented and, where applicable, independently certified. This approach is consistent with the principles reflected in ISO 14021, Global Recycled Standa
Feedstocks containing hazardous substances, contaminated waste or materials with insufficient traceability should be restricted. Inputs without documented origin increase the risk of false claims and compliance issues.
Open-loop, non-textile-origin feedstock (e.g., PET bottles) should be excluded from T2T recycled-content claims, as it does not contribute to solving the European post-consumer textile waste challenge and would undermine the market signal that binding T2T targets are designed to create. European post-consumer textile waste should be prioritized as the reference feedstock, in order to address the end-of-life challenge of textile products and to build the truly circular system the sector needs. Defining mandatory recycled-content targets on the basis of other sources, such as open-loop recycling streams, or post-industrial textile waste would not support the development of a genuinely circular textile system, since it would leave the end-of-life challenge unaddressed. Standards such as OEKO-TEX can play a useful role here, by giving assurance that recycled material is genuinely closed-loop.
Exclude Entirely: Internal Factory Rework (Regrind) Why: Scrap, edge-trims, or off-spec material that is immediately swept up and re-fed into the same extrusion or manufacturing loop must be excluded. Labeling this as "recycled" incentivizes inefficient manufacturing processes and dilutes the credibility of true waste diversion. Restrict Heavily: Non-Textile Feedstocks Containing Legacy Additives Why: Industrial or post-consumer waste from sectors like automotive, electronics, or construction often contains restricted chemical substances, heavy metals, or prohibited flame retardants. If allowed, they must be restricted by mandatory batch-level chemical clearing to prevent the toxic loop of cycling hazardous materials into new consumer or technical products.
Any contamination that causes negative impact on the recycled product due to impurities. And any feedstock from a closed loop system like PET-bottles
Non reliable origin and poor traceable materials. High blended materials Highly contaminated materials
synthetic feedstock, as they are man-made as opposed to products made from organic materials
Recycled material which is not produced from waste material PET bottle recycled material
None! People are already able to reuse fabric waste and transform them in valuable objects.
Mixed blends because harder to separate and recycle and traceability is harder
All synthetic ones – in other words, all those that produce microplastics!
Feedstock types that should be excluded or restricted when defining recycled material for textiles are those that provide limited circularity benefits, create traceability challenges, or may result in misleading sustainability claims.
In my view, we need to have diffrent strategies for each one and we have to reach in developed strategies

Feedstock types should not be excluded or restricted before there is a reliable understanding of which waste streams are actually available, in what quantities, at what quality and at what cost, both today and at industrial scale in the future. Premature restrictions could reduce the already limited supply of suitable recycled raw materials and make regulatory targets unrealistic. Restrictions may nevertheless be justified where a feedstock does not deliver a credible circularity benefit, where its origin cannot be traced, or where it creates significant technical, environmental or safety concerns. Particular attention should be given to claims involving recycled polyester, since the recycled origin and the stated recycled content cannot always be reliably verified in the final textile product. Robust chain of custody, documentation and verification requirements are therefore essential to prevent false or fraudulent recycled content claims. The priority should first be to establish a sound data basis on feedstock availability and scalability, together with practical and economically feasible methods for proving recycled origin and content. Only on this basis should specific feedstocks be excluded, restricted or prioritised. Otherwise, regulatory categories may be difficult to enforce and could unintentionally favour well documented claims over genuinely circular material flows.
If recycled raw material made of garbage or trash sorting....because sorce is not confirmed.

Question 8: If mass balance is used, what safeguards should apply?

Stakeholder feedback
Mass balance must be supported by documented feedstock tracing, independent third-party audit, and cross-registration across certification systems to prevent double-counting. Virgin and recycled inputs must be documented separately. Accounting alone is insufficient; rigorous audit and physical verification must be performed to verify that claims do not exceed documented inputs minus processing losses.
Mass balance must be supported by mandatory, unified digital documentation that tracks physical material inputs in real-time. Furthermore, independent verification by trusted audit groups is essential to reconcile physical flows with accounting records. Without this strict cross-referencing, mass balance can easily become a mechanism for 'greenwashing' rather than genuine sustainability."
audited proof need to be systematically put in place, to confirm the % of recycled inputs , and this needs to be blockchained
It should be underpinned by strict safeguards such as: certified chain-of-custody (e.g. GRS/RCS), site-level allocation (not corporate), no double counting, time limits for use of credits (≤12 months), independent third-party audits, clear consumer labelling differentiating physical vs. mass-balance recycled content, a minimum physical recycled content threshold (e.g. 20%), and exclusion of internal production rework.
If mass balance is used, safeguards should include verified traceability of the recycled input, independent third-party certification or auditing, clear allocation rules, defined accounting boundaries, and robust controls to prevent double counting. Claims should also be transparent about the use of the mass balance approach and should not imply physical recycled content where segregation does not occur.
third party certification with regular spot checks
Mass balance should only be permitted under a robust chain of custody system, with third-party certification, independent audits, full traceability, transparent allocation rules, and measures to prevent double counting. Any claims made to customers should clearly explain the use of the mass balance approach.

Mass balance systems should be supported by third-party certification, regular audits, transparent chain-of-custody documentation, and strict controls to prevent double counting or double claiming.
If mass balance is recognized, it should be aligned with existing industry standards and guidelines, such as ISO, and supported by robust chain-of-custody requirements. In addition, claims should be verified through independent third-party certification, preferably using established ones such as ISCC, to ensure credibility, consistency, and traceability
The safeguards should include mandatory third-party certification, proportional allocation of recycled content at facility level, prohibition of free allocation, and clear labeling that the claim is based on mass balance accounting rather than physical recycled content.
Mass balance is traceability of numbers which are limited.
(translated) Data integrity and product conformity
Mass balance should only be accepted when supported by independent third-party verification, complete chain-of-custody documentation, regular audits, accurate input-output reconciliation, digital traceability, and transparent reporting. Clear controls should prevent double counting and ensure recycled-content claims accurately reflect actual recycled inputs.
Mass balance should only be accepted when supported by robust chain-of-custody requirements, independent third-party audits, transparent allocation rules, full traceability, and clear communication to customers. Safeguards should also prevent double counting, double claiming, and misleading environmental claims. The accounting methodology should be publicly documented, consistently applied, and regularly verified.
Mass balance should require third-party certification, full chain-of-custody, digital traceability, transparent accounting, periodic independent audits, no double counting, clear consumer disclosure, and verified allocation rules to maintain credibility and supply chain integrity.
controlled process, credible item level claims
It should apply a standard and verified method, so the mass balance is equal to all companies.Nevertheless, I don't think that 3rd party verification is needed as it might complicate the implementation of recycling in the products by SMEs as there is already to much legal taxes and other voluntary but quite must have certificates that companies could not be able to achieve with their financial resources. The financial barrier is coming much more real each year, making companies give up or no implementation to some certifications due to too high costs of mantainance.
Must be supported by robust third party certification and auditing. Provides transparent and accurate communication to customers and stakeholders. Complies with recognized industry standards and chain-of-custody requirements
verified recycled input + accurate mass-balance accounting + no double claiming + independent verification.
Traceable system to measure and verify content
Humain health
Mass balance is critical in my opinion. The main issue is how we communicate mass balance claims. Look at FSC certification for example...inputs into and out of a paper mill are mass balance and yet we still have a credible certification that can say a product is "FSC Certified".
penalities for missed safeguradsshould be communicated that mass balance is the method used to avoid missundeetanding
Clear, auditable input-output records, defined system boundaries and reconciliation periods, documented conversion factors and yields, independent verification, and controls preventing double counting or double claiming. Recycled attributes should never exceed the verified quantity of eligible recycled input entering the defined system.

(translated) Prohibition of double counting: rigorous control of input/output quantities using real yield factors, to prevent the same recycled-material credit from being allocated or sold across different batches or customers. Traceability through Transaction Certificates (TCs): uninterrupted documentary coverage, validated by an independent third party, for every single transfer of ownership and processing step. Time-bound reconciliation and on-site audits: stock accounting balances closed within strict time windows (e.g. a maximum of 12 months) and on-site inspections, ensuring that volumes sold as "recycled" never exceed actual inputs. Invariance of toxicological controls: accounting allocation never overrides physical verification. The finished product must pass the same strict laboratory chemical tests (RSL/MRSL lists) applied to the physical material. Transparency in labelling: an obligation to state explicitly to the consumer that the content is allocated via "mass balance", prohibiting misleading commercial claims that suggest a 100% physically segregated recycled item.
a third party audit and report and certificate per batch available.
Traceability and impact to avoid rebound effect and sanitaries issues
the GRS systems seems most used. Till now GRS scope certificate needs to be corrected forevery batch with post consumer recycled textile waste as compositions changes per batch and composition is mentioned on the Scope Certificate
full chain-of-custody documentation throughout the supply chain
If mass balance used, threre should be an strict verification of details and all needed documents. The transfer should be easy for both organisation and certification body. we should make an link for purchase ans sales through the software itself.
Independent third-party certification Verified chain of custody and full traceability No double counting of recycled content Regular audits and record keeping Use only where physical segregation is not technically feasible
Only for chemical recycling using industry standard chain of custody
The variation should be defined and limited. It is more important that the recycled textile-to-textile can move forward, rather than set limitations for exact definitions.
Best would be TC based.
Recycled inputs should come from approved suppliers with credible evidence of origin and recycling process.
Perfect traçability
traçability
Separation
The traceability remains the best method
Not used. How do you actually define mass balance? This survey is using terms that are not easily understand by the consumer. It may be perceived as disingenious.
I don't think that mass balance should be allowed. Unless it can be ensured that the whole feedstock comes from recycled materials. The reason is that you need to be able to say exacly how much recycled content that is in the product for the upcoming DPP.
Environmental control (temp, humidity, etc.), clearly defined and standardized measurement method
Use of mass balance accounting should be governed by standards that have been developed, such as ISO 22095-2:2026 Chain of custody, part 2: requirements and guidelines for mass balance and in ACLCA's Guidance for Mass Balance Chain of Custody Addendum (in development) to the 2022 PCR Open Standard. In the issue brief on Mass Balance Chain of Custody Accounting in LCAs and EPDs, ACLCA has suggested the

following guardrails: § The use of mass balance across supply chains is designed to support a sustainable and circular economy, and § The LCA/EPD report is available and includes disclosure of impacts with and without mass balance, and § Transparency is provided in how the addition of the material with specified characteristics impacts the overall environmental burden, and § There are robust safeguards and management systems to prevent double counting, and § The mass balance is certified according to widely recognized 3rd party certification schemes, and § The resulting claims on the product(s) are truthful, accurate, and not misleading.
Secure document flow in an easy and simple way
software programs
eligible pathways - third party verification - CoC - allocation/reconciliation - no double claims - transparent consumer claim - evidence / audit trail
Digital TC Methods from source of origin to final output, segregated accounting systems, volume reconciliation on weekly basis, independent verification, time-bound accounting periods, transparency, cross verification and complaint&correct mechanisms.
I think mass balance is not relevant, segregation is relevant,
A proper definition of how calculate the input/output conversion factor considering the blend with non-recycled material.
Safeguards should ensure certified chain-of-custody, transparent allocation rules, independent audits, and strict prevention of double counting to maintain recycled material integrity.
By being observant about what goes wrong and not letting any dangers happen and helping the workers
Mass balance it self is best safeguard and ensure that is appropriate and authenticate.
Be sure that the sustainable products don't end up containing some of the unsustainable product nor that it is tainted by it.
For recycled textile items, mass balance may be accepted as a legitimate accounting technique, but only as a chain-of-custody approach that is properly identified.
This is the question we are best placed to answer. The core safeguard is that each transfer of recycled input must be recorded at transaction level with an immutable, independently verifiable audit trail — one that any authorised party can verify without relying on access to the platform operator's or certifying body's system. Specific requirements: (1) transaction-level timestamping at each custody transfer; (2) accounting periods capped at monthly maximum to prevent over-attribution; (3) technical prevention of double-claiming across schemes; (4) the recycled-attribution ratio must be auditable in real time, not only at annual certification; (5) the audit trail must remain verifiable even if the original certifying platform ceases to operate. Records held solely in a private database — even with periodic hashing to a blockchain — do not meet this standard if verification requires calling that database.
Balancing the proposition
(translated) The quality
If mass balance accounting is permitted for recycled textile materials, it should be subject to robust safeguards to ensure integrity, transparency, and consumer confidence. Recommended Safeguards Safeguard Requirement Purpose Defined Scope Mass balance shall only be permitted where physical segregation is technically impracticable (e.g., chemical recycling). Prevents unnecessary use of mass balance when segregation is feasible. Verified Chain of Custody All organizations in the supply chain shall maintain documented chain-of-custody

records. Ensures traceability of recycled inputs and outputs. No Double Counting Each unit of recycled feedstock shall be allocated only once and shall not be claimed by multiple products or organizations. Maintains accounting integrity. Input–Output Reconciliation Total recycled content claimed shall never exceed the verified quantity of recycled input, adjusted for documented process losses and conversion factors. Prevents overstatement of recycled content. Defined Allocation Rules Allocation methodology (e.g., mass, polymer type, production batch, or accounting period) shall be documented, consistently applied, and auditable. Ensures fair and reproducible allocation. Time-Bound Accounting Recycled input credits shall be allocated within a defined accounting period (e.g., monthly, quarterly, or annually) and shall not be carried forward indefinitely. Prevents accumulation of unsupported claims. Independent Verification Mass balance systems shall be audited periodically by an accredited independent third party. Builds confidence in claims. Transparent Product Claims Products using mass balance shall clearly disclose that recycled content is attributed through a mass balance accounting approach. Avoids misleading consumers and buyers. Document Retention Records of purchases, production, inventory, allocations, and sales shall be retained for a defined period (e.g., at least five years or as required by applicable regulations). Supports audits and regulatory compliance. Material-Specific Accounting Credits shall only be allocated between equivalent material types (e.g., PET-to-PET, nylon-to-nylon) unless explicitly permitted by the standard. Preserves material integrity. Process Yield Documentation Actual conversion yields, waste, and losses shall be documented and reflected in recycled-content calculations. Ensures accurate accounting. Management System Controls Organizations shall maintain written procedures, internal controls, employee training, and periodic internal audits for the mass balance system. Supports consistent implementation. Additional Good Practices Digital traceability systems to improve transparency. Unique transaction records to prevent duplicate claims. Regular reconciliation of inventory against production and sales. Risk assessments to identify fraud and allocation errors. Corrective action procedures for discrepancies identified during audits. Recommended Standard Requirement Where mass balance accounting is used, organizations shall implement a documented, transparent, and independently verified chain-of-custody system. The quantity of recycled content claimed shall not exceed the verified recycled input, adjusted for documented process yields and losses. Allocation rules shall be consistent, auditable, material-specific, and prevent double counting. Product claims shall clearly disclose the use of mass balance accounting, and all relevant records shall be maintained to support verification. Physical segregation shall remain the preferred method wherever technically and economically feasible. These safeguards are consistent with best practices reflected in internationally recognized chain-of-custody frameworks such as ISCC PLUS, GRS, RCS, and other mass balance systems used for recycled polymers and advanced recycling technologies.
Independent third-party audits, transparent record keeping, chain-of-custody documentation, clear claim rules, and regular verification should be mandatory to prevent double counting and misleading claims.
The criteria to which the mass-balance methodology applies should be defined for each stage of the value chain. For Tier 4 (recyclers), for instance, these criteria should include the type of textile waste (post-consumer vs. post-industrial) and its geographical origin (country of origin). If mass balance is used the following safeguards should apply:

- Verified input tracking: Documented, auditable tonnage of textile waste entering the facility gate, distinguishing textile-waste input from any other feedstock. - Defined temporal boundaries: A clearly bounded reconciliation period (e.g., annual) over which input and attributed output must be reconciled, preventing indefinite carry-forward or speculative attribution. - Defined geographical boundaries: Mass balance should be applied within clearly defined geographical boundaries (e.g., at facility or country level), consistent with the origin criteria defined above, to preserve the link between the claim and a verifiable feedstock pool. - No over-attribution: Recycled-content claims across all outputs of a facility must never exceed the certified textile-waste input for the corresponding balance period; a full input of textile waste can justify a corresponding claim of recycled content, but not beyond that ratio. - Strict conditions on allocation and pathways: Mass balance should only be permitted under strict conditions, excluding free allocation for the recycled-content attribute and applied to continuous processes, as opposed to batch processes, where attribution can be tracked. -Third-party certification: Alignment with recognized schemes to ensure independent verification of both input and attribution methodology. - Audit: Traceability from collection and sorting through to the facility gate, with records available for inspection by certifying bodies and authorities. -Transparent disclosure: The chain-of-custody model applied (mass balance vs. physical segregation) should be disclosed to downstream customers and via the Digital Product Passport, so that claims are not misrepresented as physically segregated when they are attributed.
To prevent greenwashing and volume inflation, three mandatory safeguards must apply: Strict Site-Specific Bookkeeping: Mass balance tracking must occur at a single-facility or site-specific level. Companies cannot trade or transfer "recycled credits" between separate global manufacturing facilities to artificially balance their books (no cross-border credit swapping). Explicit Loss Accounting: The volume of output credits generated must mathematically account for real production yield losses. If a chemical recycling process has a 15% material loss during depolymerization, 100 kg of input feedstock can only yield a maximum of 85 kg of recycled-attributed output. Prohibition of "Credit Laundering" Across Material Classes: Credits cannot be swapped between completely different polymer types (e.g., using a surplus of recycled polyethylene credits to claim a polypropylene batch is recycled).
Full traceability and a documented chain of custody throughout the supply chain. Independent third-party verification and regular audits. Transparent and auditable mass balance calculations with complete record keeping.
Verifiable calculations for energy consumption
The use of a digital platform solution to countercheck the data better. Regular check during certification and during audits
Mass balance should not be used
The entire process must undergo an annual, independent audit through recognised certification schemes.
mass balance should only be relied upon when it is supported by robust measurement, documented procedures, regular reconciliation, and independent verification

Strong safeguards require a combination of robust traceability systems, third-party certification, and transparent auditing. Standards such as ISCC, GRS, and OEKO-TEX® already provide frameworks to ensure that inputs and outputs are properly accounted for and not double-counted. In addition, digital tracking solutions (e.g., blockchain, digital product passports, or smart tagging) can further strengthen credibility by improving data transparency across the value chain. Ultimately, mass balance only works if it is backed by trust, verification, and accountability—otherwise it risks becoming a purely marketing-driven claim rather than a real sustainability solution.
If mass balance is used, it should be subject to clear and enforceable safeguards. The methodology should define the relevant system boundaries, accounting period, conversion factors and allocation rules, and it must prevent double counting or the allocation of recycled content that was never actually introduced into the relevant supply chain. Claims should be transparent and should not imply that a specific product physically contains the stated proportion of recycled material where this cannot be demonstrated. Product level communication should therefore clearly distinguish between physically verified recycled content and content attributed through a mass balance system. A robust chain of custody, supported by documentation, independent verification and access for market surveillance authorities, is essential. This is particularly important because analytical testing of the final textile product is currently unable to reliably determine the exact recycled content for many materials, including mechanically recycled cotton and complex blends. The risk of false or misleading claims, including in relation to recycled polyester, cannot therefore be addressed through product testing alone. The system should also be based on reliable data concerning which recycled feedstocks are actually available, in what quantities, at what quality and at what cost. Without this information, mass balance could create accounting claims that are disconnected from the real availability and use of recycled raw materials. Requirements should remain proportionate for SMEs. However, a general exemption could undermine the credibility and consistency of the system. Simplified documentation, reduced audit frequency, shared certification solutions and financial or technical support would be preferable to removing verification obligations altogether. Before mass balance is endorsed as a regulatory methodology, the rules for substantiation, consumer communication, market surveillance and enforcement should therefore be clarified at European level
By controlling or minimising Percentage of recycled raw material from dyed articles
Customer info.

Question 9: Where mass balance is used, should chemical or hazardous-substance testing be conducted on the specific physical batch carrying the recycled-content attribution, or is testing a representative sample sufficient?

Stakeholder feedback
Depends on the feedstock.

For credibility, chemical testing must be conducted on specific material batches to ensure safety and compliance. Relying solely on representative sampling of total production is insufficient, especially when dealing with recycled inputs that may contain unknown chemical histories. Batch-specific testing is the only way to safeguard consumer health and ensure the integrity of the recycled content claim."
Representative sample need to be strictly defined
testing a representative sample from the overall production.
chemical or hazardous-substance testing should be conducted on the specific physical batch carrying the recycled-content attribution or traceabitlity markers eventually could be a solutoon too (haelixa?)
Testing should be performed on the specific physical batch receiving the recycled-content attribution because representative sampling based on the overall run may not capture contamination in that batch. Where the recycling process has been validated to consistently remove hazardous substances, however, reduced testing on the basis of representative samples may be allowed subject to third party verification and risk assessment.
Testing of a representative sample from the overall production run should be sufficient, provided that the production is homogeneous and subject to consistent controls and traceability. Batch-specific testing should only be required where there is a specific risk of variation or contamination.
testing of a representative sample is enough
Representative sample testing should generally be sufficient
Representative sampling from the overall production run may be sufficient where the manufacturing process is well controlled and homogenous.
A representative sample of the overall production should be tested, which could be the specific batch. For mass-balance, it is only a mathematical attribution of the recycled content to a certain batch, so it would not be expected that it can be detected physically.
In most cases, testing a representative sample from the overall production run is sufficient to support both claims, provided the production process is homogeneous and consistent; however, if different batches of recycled feedstock vary significantly in source or contamination risk, additional testing on the specific physical batch carrying the attribution is advisable.
Yes testing should be made mandatory.
(translated) It is sufficient to test a representative sample
A risk-based approach is recommended. Representative sampling may be sufficient for consistent, well-controlled production processes with proven quality systems. However, batch-specific testing should be required for high-risk materials, new suppliers, chemically recycled feedstocks, or products with elevated chemical compliance risks. This approach balances product safety with practical manufacturing considerations.
A risk-based approach should be applied. Representative sampling from the overall production run is generally sufficient, provided that the production process is controlled, traceability is ensured, and the mass balance system is independently verified. However, testing of the specific physical batch should be required where there is a higher risk of contamination, process variability, or regulatory concern. This approach maintains product safety while avoiding unnecessary testing and costs.
Representative production-run testing is acceptable only if manufacturing conditions remain consistent. Batch-specific testing should be mandatory for high-risk materials, regulatory compliance, or whenever process changes could affect chemical safety or product conformity.
depends what process is involoved and what level of content it should be certified, for example specific batch testing should be carried out like in medical sector for quality assurance but under certian content level it can be only representatibe sample testing.
I cannot give an answer to this matter. The overall production run should be sufficient.

Representative sample that showcase the worst case scenario, if that is possible.
Specific batch testing should be required where there is significant variability or a higher risk of contamination, while representative testing should be accepted for consistent and well-controlled production, based on documented risk assessment and defined sampling criteria.
I think a combination of both
It must be tested et reviewed
I guess batch wise will be fine
Depends on the process I assume. I would think that in some cases yes. Testing should be based on the level of risk.
best practises to verifiaction is reasonable
Where recycled attribution is assigned through mass balance, there may not be a physically identifiable “recycled batch. Testing should therefore apply to representative physical output from the relevant process, with testing frequency determined by feedstock variability and chemical risk. Higher-risk or highly variable feedstocks should require more frequent batch-specific testing. Testing requirements and costs should to be risk based and also economically viable.
(translated) oxicological safety is a physical parameter, not an accounting one. Although mass balance allows for flexible, accounting-based allocation of recycled content, this method does not apply in any way to chemical verification: Objective anti-fraud verification: exemption from hazardous substances or inherited pollutants (legacy chemicals) must be real and exact for the individual batch of yarn or fabric intended for the consumer. Independence of requirements: the attestation of recycled content (documentary) travels separately from toxicological safety certification (analytical). Every batch placed on the market, regardless of the accounting credit it carries, must individually pass RSL list testing in the laboratory to guarantee the absence of skin risks.
No, regular finished product safety compliance applies.
Testing a representative sample (advised by the lab) of texile waste used for recycling has not given any hazardous substances as result. We test yearly. High risk items like certified workwear are not used for recycling but are reused if possible or incinnerated by the brands (logo's). Garments sorted for reuse are not tested. Testing point is of the recycled fibers as sorting-for-recycling is done having a certain composition spec in mind.
chemical testing should always be used
As a recyled materials, testing a representative sample from overall production is sufficient, but the sample should be selected by certification body. That means which sample from the purchase has to be decided by cb.
Representative sampling should be sufficient
The representative sample should be able to support both claims as end product.
it depends on the end product and what type of material that is in the mix of recycled material. Some areas may need more testing in each batch, but other areas it may be sufficient with a sample check.
At least spot testing to be done over the year, testing each batch could be skipped. Maybe a risk based approach developed.
This is primarily supported by the mass-balance accounting and chain-of-custody records, not by chemical testing of the individual physical batch. In mass balance, recycled characteristics are allocated administratively to eligible outputs; the physical batch may contain a mixture of recycled and virgin material
Both
both
Production run
A representative sample is enought

No mass balance to be used.
Testing of a representive sample from the overall production should be sufficient. Can it be assumed that there is a dilution effect? Testing of every batch might be hard to make a business reality. Then it would be a lot more cost effective and safer to use virgin materials. We can't stop the marked for recyled materials.
Specific batch measurements will lead to healthy results
Depends on the case, but sample testing should be enough
Chemical or hazardous substance testing should not be related to mass balance accounting. Such testing should be carried out on a representative sample of any product making a recycled claim if there are indications that it is needed.
Mass balance
no it is unsufficent
mass balance proves allocation/CoC, but not chemical safety >>> representative sampling with batch-specific testing should be required where feedstock, process, supplier or chemical risk vary.
Respect to all areas.
I guess that testing a representative sample from the overall production is sufficient to support calim, and tests are very expensive,
Where the "end of waste" is determined (the physical batch as output of the recycling process) on the basis of a proper risk assessment.
Not necessary
Both are very important ways to check for any potential issues
Mass balance should applicable to manufacturer at each stage of production, however it should be like input, production and out out material quantity with specified batch/lot number.
Chemical or hazardous-substance testing should be conducted on the specific physical batch carrying the recycled-content attribution.
Mass balance is fundamentally a chain-of-custody/accounting mechanism. And recycled attribution is supported by Certified inputs, manufacturing records, volume reconciliation, and controlled blending/mass-balance regulations—rather than chemical examination of the final batch. Thus a volume reconciliation at the batch level under controlled blending may confirm recycled nature. Evidence must be reflective of the actual textile product being sold in order for it to meet an RSL, MRSL, legal chemical limit, or other hazardous-substance requirement.
Non
For textile applications, the recycled-content claim (via mass balance) and the chemical safety claim are two separate issues and should be verified independently. Recommended Position Where mass balance accounting is used, chemical and hazardous-substance testing should be performed on the physical product or a representative sample from the relevant production lot/batch to demonstrate compliance with chemical safety requirements. The testing should not be used to verify the recycled-content claim itself, which must be supported through a verified mass balance chain-of-custody system. Rationale Mass balance verifies quantity and allocation, not the physical presence of recycled molecules in a specific item. Chemical testing verifies product safety, regardless of whether the product contains virgin or recycled inputs. A laboratory test cannot determine whether recycled content has been allocated correctly under a mass balance

system.
Therefore, recycled-content verification and chemical compliance should remain independent but complementary.
Recommended Approach
Aspect Verification Method
Recycled-content claim Verified chain of custody, mass balance accounting, input-output reconciliation, and third-party audit.
Chemical compliance Testing of the finished product or representative production lot in accordance with the applicable restricted substances list (RSL), MRSL, or regulatory requirements.
Should Every Attributed Batch Be Tested?

Not necessarily. A risk-based sampling approach is generally appropriate, provided that:

The production lot is homogeneous with respect to materials, formulation, and process conditions.
The sampling plan is statistically valid and documented.
Testing frequency reflects the level of risk, supplier history, material changes, and regulatory requirements.
Any significant change in raw materials, recycling process, chemical formulation, or production conditions triggers additional testing.

Where there is higher risk—for example, post-consumer feedstocks with variable composition, unknown material history, or elevated likelihood of restricted substances—more frequent or batch-specific testing may be warranted.

Recommended Standard Wording

Where recycled content is attributed using mass balance accounting, the recycled-content claim shall be verified through a documented and independently audited chain-of-custody system. Compliance with chemical and hazardous-substance requirements shall be demonstrated through testing of the finished product or representative samples from the relevant production lot, using a documented risk-based sampling plan. Chemical testing shall verify product compliance and shall not be relied upon to substantiate recycled-content attribution under a mass balance system.

This approach is consistent with the principles used in major textile certification and regulatory frameworks: chain-of-custody systems verify recycled-content claims, while product testing verifies chemical safety and regulatory compliance.

Representative sampling from the overall production run may be sufficient when supported by a robust risk-based testing program and traceability system. Higher-risk materials should require batch-specific testing.

This is a difficult question to answer definitively, as it depends on the specific production configuration (e.g., continuous vs. batch processes, single stream vs. co-production of recycled and virgin material). Testing a representative sample of the overall production run would suffice to support both the chemical-safety and recycled-content claims. One idea that could be pushed, drawing on EURATEX's position on PFAS compliance, is to adopt a risk-based approach rather than mandatory batch-specific testing: - Compliance and enforcement should be based on a risk-based combination of supply-chain documentation, chemical management, due diligence and targeted testing where justified. - Mandatory analytical testing of every physical batch should be avoided where operators can demonstrate adequate supply-chain controls and due diligence; representative sampling should be sufficient in such cases. - Testing requirements should be proportionate to the actual production configuration (continuous vs. batch processes), rather than applying a uniform batch-by-batch rule regardless of how recycled and virgin streams are managed on site.
Testing a representative sample from the overall production run is sufficient to support both claims. The Technical Reality: By its very definition, mass balance involves the physical co-mingling of virgin and recycled feedstocks inside a continuous production reactor or extruder. Because the output is a completely homogenous mixture, the specific physical batch assigned the administrative credit is chemically identical to the rest of the production run. Testing the entire representative run ensures chemical safety across the entire batch, making individual batch testing redundant.
First option
Arisk-based approach should be applied. Representative sampling from a well-controlled and homogeneous production run may be sufficient where process consistency has been demonstrated and supported by robust quality controls.
Yes, chemical or hazardous-substance testing should be conducted on the specific physical batch carrying the recycled-content attribution.
This depends on the source of the recycled material. If it comes from defined pre-consumer source testing from the overall production is sufficient. In case of post consumer it should be per batch a risk based testing performed. Another solution could be that in case of not defined post consumer over the year the testing is spread. Also here risk based approach.
Chemical specialists should be asked
From the overall production
Where mass balance is used, should chemical or hazardous-substance testing be conducted on the specific physical batch carrying the recycled-content attribution.
In most mass-balance systems, testing the specific physical batch carrying the recycled-content attribution is not normally required solely because of the recycled-content claim. Mass balance works as a bookkeeping and chain-of-custody method: sustainable or recycled inputs are allocated administratively across outputs, and the attributed batch is not necessarily physically distinguishable from other batches produced in the same run.

In a mass balance system, recycled-content attribution is an accounting approach rather than a physical segregation of materials. Because of that, chemical or hazardous-substance testing is typically not required on the exact “attributed” batch. Instead, testing a representative sample from the overall production run is generally considered sufficient—provided that the production conditions, inputs, and chemical management systems are consistent and well-controlled. That said, credibility depends on strong safeguards: robust chemical management systems (e.g., MRSL/RSL compliance), traceability, and third-party certification (such as ISCC, GRS, or OEKO-TEX®). These frameworks ensure that both recycled content claims and chemical safety claims are valid and not misleading. In short, mass balance relies on system integrity and verified processes, so representative testing—combined with strict controls and audits—is usually the accepted and practical approach.
The question mixes two separate issues. Mass balance is a chain of custody approach for allocating recycled content, whereas chemical and hazardous substance testing serves to demonstrate compliance with product safety and chemicals legislation. These requirements should not be linked. We do not support any additional testing requirements solely because recycled content is attributed through a mass balance approach. Chemical testing should continue to follow the applicable product safety and chemicals legislation and a risk based approach. Introducing additional testing obligations would create unnecessary costs and administrative burdens without improving the credibility of recycled content claims.
In Both case Testing should be applicable But can we know the percentage of recycled material used by testing final product..?
Strange question, the law apply. So if the product is importen it has to comply with the law? Not sure what you Ask about! Sorry…..

Question 12: If segregation is required, at what stage should it begin: post-recycling feedstock, yarn stage, fabric stage, or finished product?

Stakeholder feedback
Depends on the feedstock.
Physical segregation must begin immediately after the recycling process. Ensuring that recycled fibers are separated from virgin materials at the earliest possible stage—specifically at the fiber/yarn stage—is the only way to prevent cross-contamination and ensure the integrity of the recycled material claims. Delaying segregation until the final product stage renders traceability ineffective and significantly increases the risk of contamination."
Depends on the fabric type
post-recycling feedstock

Segregation should begin at the post-recycling feedstock (right after the recycling process) and continue through the yarn, fabric and finishing. This gives full traceability and avoids any accidental mixing. If physical segregation at feedstock stage is not possible (e.g. chemical recycling) the earliest possible differentiation point should be defined and third-party certified. However, segregation must be before value adding processes (spinning, dyeing etc.) where traceability would be lost.
blends of the same fibre (virgin and recycled) in one article must be allowed. Segregation during production should be follwed industry best practice principle.
post-recycling feedstock
Segregation should begin at the post-recycling feedstock stage to maintain traceability throughout the supply chain and minimize the risk of mixing recycled and virgin materials.
post-recycling feedstock
Initial stages as it will save post after effects.
fase del tessuto e prodotto finito
Physical segregation should begin immediately after the recycling process, at the post-recycling feedstock stage, and continue through yarn production where identity preservation is required. Early segregation minimizes contamination risks, strengthens traceability, and improves confidence in recycled-content claims throughout the supply chain.
Segregation should begin at the post-recycling feedstock stage and be maintained through subsequent processing where technically and economically feasible. Starting segregation immediately after recycling provides the highest level of traceability and confidence while allowing flexibility for downstream manufacturing processes under verified chain-of-custody systems.
Fabric stage
the early the better at the recycling output, then the chain of custody is aligned and supported from newborn of the 2ndary raw material
I think it depends on where the recycling point starts: at fibre stage or yarn stage or any other for specific cases.
Post-recycling feedstock.
post-recycling feedstock
Feedstock onwards
All
All stages
I'm unsure exactly what the implications of this would be. It probably depends on the claim being made. I think we should be doing as much as we can to lower the barrier. If we're forcing producers to set up new systems of segregation that add to cost...which reduces adoption simply because we want to say "this product contains physical recycled content" then I'm not sure that it would be worth it. There are already too many barriers to adoption for the circular economy, so I'd like to see us be as practical as possible while also not greenwashing.
yarn
Non-physical segregations through good manufacturing processes and ERP controls should be a priority. Part of a third party assurance scheme should assess a facilities ability to segregate by non-physical means for example, clear bar codes / labeling of batches. I would suggest physical segregation is only required where the manufacturing controls do not enable segregation by other means.
(translated) Physical and documentary separation between recycled and virgin material must begin immediately at the post-recycling raw material stage (as it leaves the mechanical shredding, extrusion or chemical depolymerisation plant), before any subsequent production process starts.
not required, focus on environment, climate and biodiversity atom effeciency.

According to a maximum traceability goal every steps a,d at least post recycling except if fabric stayed in stock warehouse
no segregation from virgin material is recommended
The amount that can migrate is so minimal that keeping the materials physically separated provides little practical value.
Yes, Physical segrigation should made as mandatory from yarn and fabric. As finished products, eventually they know the products with physicall appearence itself.
at post-recycling feedstock
Post-recycling feedstock
It must be clear what is in the product - it should be separated through the whole line
from spinning on. But segregation during processing stages can happen computer based as well meaning that it si sufficient to have the recycling info in the ERP system to flag batches and being able to treat them appropriate. Also ERP system can make physical separation on warehouses obsolete in cas all pieces on stock have clear identification in the system.
For recycled textile claims using segregation, the safest approach is to begin segregation as early as practical—ideally at the post-recycling feedstock stage.
post-recycling feedstock
after recycling
post-recycling feedstock
Fabric stage
At all indicated stages
Yes always should be segregated.
As early as possiblw to not have it mixed up from the beginning; post-recycling feedstock
post-recycling feedstock
at post-recycling feedstock stage
post-recycling feedstock,
yarn stage
see the flow here: waste > recycling > recycled poly fibre | segregation begins here | yarn > fabric > garment
From source of origin to fina output.
yarn stage
Post-recycling feedstock
Segregation should begin immediately after recycling feedstock, ensuring traceability and purity through yarn, fabric, and finished product stages.
Post-recycling
Segregation should apply from raw material storage to production and final product storage.
At the beginning
It is recommended to start segregation immediately after the recycling process. At the first identifiable recycled-material output, rather than waiting until yarn, fabric, or finished-product stage.
Not our field of expertise. We note that where physical segregation is not required or not feasible, the burden on documentary traceability is correspondingly higher — and the assurance requirements for those records should reflect that.
All areas to be considered

(translated) To no longer use them
Segregation should begin at the earliest practical point after the recycling process—typically at the post-recycling feedstock stage. Starting segregation immediately after recycling provides the strongest chain of custody and minimizes the risk of mixing recycled and virgin materials throughout downstream processing. Recommended hierarchy Stage Recommendation Rationale Post-recycling feedstock (preferred) ☑ Yes Ensures recycled material identity is maintained from the point it enters the textile supply chain. Yarn stage ☑ Acceptable if segregation at feedstock is not practicable Maintains traceability through spinning and subsequent processes. Fabric stage ⚠ Less preferred By this stage, opportunities for mixing have already occurred, reducing traceability. Finished product ✗ Generally not sufficient Segregation only at the finished-product stage cannot demonstrate that recycled material remained separate throughout production. Recommended requirement Where physical segregation is required, it should commence immediately after the recycling process, at the post-recycling feedstock stage, and be maintained throughout subsequent manufacturing, storage, transportation, and processing until the point at which recycled-content claims are made. If segregation at the post-recycling feedstock stage is not technically feasible, segregation shall begin at the earliest practicable downstream stage (e.g., yarn), with documented justification. This approach maximizes traceability, reduces the risk of inadvertent mixing, and aligns with good chain-of-custody practices while allowing limited flexibility where justified by the manufacturing process.
Segregation should begin at the post-recycling feedstock stage and be maintained through yarn and fabric production where necessary to support credible recycled-content claims.
We understand segregation, in this context, as the separation of textile-waste feedstock from virgin raw material at Tier 4 (recyclers), and, down the value chain from Tier 3 to Tier 1, as the ability to distinguish products incorporating recycled material from products made from virgin sources. Understood this way, segregation should be ensured at each stage of the value chain, from Tier 4 through to Tier 1. At Tier 4, this means keeping textile-waste feedstock distinct from virgin feedstock entering the recycling process. At each subsequent tier (T3 to T1), it means maintaining the ability to identify and separate outputs and products that incorporate recycled content from those made purely from virgin material, so that the recycled-content claim can be reliably attributed and carried through to the finished product.
Post-recycling feedstock The Technical Reality: For mechanical recycling pathways, physical segregation must begin the moment the waste is transformed into post-recycling feedstock (such as chips, pellets, or fiber bales). Because mechanical processing does not alter the fundamental molecular identity, keeping these batches physically isolated through the yarn, fabric, and finished product stages is the only way to ensure the physical integrity of the product and accurately verify claims without relying on mass balance estimations.
Until intended mixture is performed
All

Post recycling
post-recycling feedstock
At the feedstock, as further in the process it could be already mixed together
Post recycling feedstock
Finished product
Finished product
Copilot said: If segregation is required, it should generally begin at the earliest stage necessary to preserve the integrity of the claim being made.
If physical segregation is required, it should ideally begin as early as possible in the value chain—starting from the post-recycling feedstock stage. The earlier segregation is implemented, the stronger the traceability and the higher the credibility of the recycled-content claim. Maintaining segregation through subsequent stages (spinning, fabric formation, and finishing) ensures integrity, but in practice, the critical control point is at the input stage, where recycled and virgin materials first enter production. That said, the exact requirement depends on the certification standard being applied. Some standards require full segregation throughout all stages, while others allow controlled mixing under strict documentation. In general, earlier and continuous segregation = higher assurance and lower risk of claim dilution or misallocation.
Yarn and fabric stage
(translated) Raw materials before recycling

Question 17: If percentage claims are permitted, what minimum threshold or substantiation standard should apply, and why?

Stakeholder feedback
20%, this is what is currently possible, realistically. Anything less is greenwashing.
The minimum threshold should be set at a meaningful level, such as 20-30% of recycled content, to ensure the claim represents a genuine contribution to sustainability. The standard of proof must be based on analytical laboratory validation for every batch, coupled with verified mass balance documentation. This dual approach ensures that the percentage is not just an accounting fiction, but a physically verifiable reality that guarantees product safety and quality."
70% less than this means that the fabric is a mixed one. And that it is itself non-recyclable I would say 100% honestly, but we need to make recycling fabrics shine and make them the norm More regulations, more transparency, and traceability
It should be a requirement to communicate the percentage of recycled material for transparency reasons. It is important to communicate the percentage especially if it is 2% recycled material to make sure that no customers are mislead.

20%, because it's a good start
20% by weight textile fibres (excluding trimmings). GRS standard based; ensures meaningful environmental impact and prevents misleading consumers with trivial claims (1-5%). Below 20% only qualitative claims (e.g. 'contains recycled material')
No minimum percentage threshold should be required, provided that the actual recycled content is accurately calculated, transparently disclosed and supported by verifiable traceability records. The claim should reflect the actual percentage of recycled input and should not be rounded up or presented in a misleading way.
20%
15%
Percentage-based recycled content claims should only be permitted when the recycled content is accurately quantified and verified through traceable records and third-party certification. In addition, a minimum recycled content threshold may be considered to prevent misleading claims based on the use of only a negligible amount of recycled material.
We do not recommend a minimum recycled-content threshold. Instead, any percentage claim should be supported by clear, consistent substantiation requirements, including traceability documentation and, where applicable, independent third-party certification. To improve transparency and avoid misleading claims, the actual percentage of recycled content should be clearly disclosed whenever a recycled-content claim is made.
1-2
Percentage claims should only be permitted above a minimum threshold of 20% recycled content, supported by third-party verification and documented chain-of-custody. Lower percentages may have limited environmental significance and can be misleading. The actual recycled content percentage should be clearly disclosed to ensure transparency and maintain consumer confidence.
Percentage claims should only be permitted above a clearly defined minimum threshold established by the standard.
depending on the rec material sources, the market availability & technical accountability should be reflected. 20% might be the middle point since it will create push & pull effect in industry.
I think at least the RCS claim should be accepted, 5%, probably it is better to claim % than only claim that there is a recycled material to be more transparent on the market and that the customer or end-user can have better criteria of purchase.
The minimum % does not matter, as long as you can clearly substantiate what part of the product contains recycled content. (Material label shows exact % and commercial claims should not be misleading in these cases)
30-50%
10%
I do think it's appropriate to have a minimum. Maybe 20%, but that could vary depending on the level of difficulty. Maybe a textile to textile claim could go down to 10% to encourage adoption.
should be transparement and scalled
Alignment should be made across the industry following leading standards such as the new Materials Matter standard from Textile Exchange. The percentage should be clearly and accurately stated. Claims should be based on verified quantities, a defined calculation methodology, clear chain-of-custody evidence and disclosure of the applicable accounting method. The rules should apply consistently whether the recycled input originates from textile or non-textile waste.
(translated) Minimum threshold of 20% for traceability and 50% for labelling
>5%

20%
Minimum 20% in the garment. For post consumer mechanical recycled material 20% is realistic in terms of quality/ costprice compared to virigin fabrics. It helps the recycling industry to offer a good product and to use EU recycling capacity. We can actually make fabric with 80% PCW however look and feel are somewhat robust.
Percentage claims should only be permitted when they are supported by robust, independently verified evidence. The claimed recycled content should be substantiated through recognised chain-of-custody certification (e.g. GRS or RCS), supported by material traceability and third-party auditing
As far as we consider this as recycled, the product must contain 50% of recyled materials. This makes as an real recycled material by the recycled percentage.
No limit, any procent of recycled content matters
A minimum of 25% verified via a third party
No minimum threshold; but only as information. The end product should not be claimed as Recycled if the percentage is to low.
30% is a good share. However, it needs to be considered that at least mechanical recycling will always require a certain share of new material to maintain mechanical strenght
If percentage claims are permitted, I would recommend a minimum 20% recycled content threshold for a substantiated B2B claim, but at least 30–50% for consumer-facing claims, depending on the claim strength.
minimum 50% unless cotton 20%
Minimum 50% except cotton 20%
No threshold, the main goal is to scale up recycling processes in the industry.
Not to be permitted. It's not honest.
A standard and benchmark should be established, with proven traceability
A single threshold is not appropriate for all material types, constructions, etc. Because some combinations of materials and recycling process type have maximum limits, the minimum threshold should not be set so high that it prevents all claims. However, it should not be set so low as to be meaningless.
30
20-30% depending on the type of product
Maybe GRS, 50%,
20%
According to specification
Unsure about this question because there is too much to discuss and then decide. However, it will be depends on brands demands.
A minimum of 60 - 70% so that it shows it is serious. I know virgin fibers can be used to strengthen some recycled products but they should preferably also be sustainably sourced. Everything should be detailed on the label for the customer to understand what he buys.
30% provides meaningful recycled content while still allowing products that combine recycled and virgin fibers.
Not our field of expertise on the threshold itself. On substantiation: any percentage claim should require that the stated percentage can be traced to specific, timestamped, independently verifiable transaction records — not to a summary figure in a supplier's database. The standard should be: can a third party, with no access to the certifying body's system, verify that the claimed percentage is supported by documented inputs? If not, the substantiation is insufficient regardless of the threshold.
40%
(translated) 80% for product quality

Percentage claims should be permitted without a fixed minimum threshold, provided the claimed percentage is accurately quantified, independently verifiable, and not misleading. Where a threshold is considered necessary to avoid insignificant claims, a minimum of 5% recycled content by weight is appropriate. Rationale Accuracy is more important than an arbitrary threshold. A product containing 7% recycled content should be allowed to claim exactly 7%, provided it is fully substantiated. Verification should be mandatory through chain-of-custody documentation, transaction records, and, where applicable, verified mass balance accounting. Claims should always specify: Percentage by weight Scope of the claim (material, component, or finished product) Type of recycled content (pre-consumer, post-consumer, textile-to-textile, etc.) Very small percentages (e.g., below 5%) may have limited environmental significance and could be misleading if highlighted in marketing. If a threshold is adopted, 5% by weight is a reasonable minimum while still encouraging the uptake of recycled materials. Example wording for the survey Percentage claims should be permitted provided they are calculated on a consistent basis (preferably by weight), supported by robust chain-of-custody documentation and independent verification, and clearly identify the type and scope of recycled content. If a minimum threshold is required, a threshold of 5% by weight is recommended to avoid insignificant or potentially misleading claims while maintaining transparency.
A minimum recycled-content threshold of 20% should apply, supported by traceable documentation.chain-of-custody records, and independent verification. This helps prevent misleading claims while encouraging adoption of recycled materials.
We propose a minimum threshold of 5% recycled content for a percentage claim to be permitted. This aligns with the existing flexibility under the EU Textile Labelling Regulation, whose article 9(2) allows a fibre making up no more than 5% of the total (or several minor fibres together not exceeding 15%) to be grouped under "other fibres" with a combined percentage setting a precedent for the minimum share considered meaningful enough to be individually reported. Below this threshold, claims should not be permitted, as the recycled share would be too marginal to substantiate a credible or verifiable percentage claim.
The Substantiation Standard: Percentage claims must be permitted but governed by a split-tier framework that directly aligns with the new Materials Matter Standard (MMS) rules:Minimum Certification Threshold: 5% certified recycled input. This low entry barrier is essential to encourage early-stage innovation, low-blend testing, and the integration of highly complex recycled materials into technical applications without locking out smaller suppliers. Finished Product Labeling Threshold: 20% minimum recycled content to carry a branded product logo or public-facing claim.
No minimum. Any percentage shall be provided
At least 30 %
Equal to the percentage of recycled material.
Minimum 30% to be reliable on the market. Below is greenwashing.
Like with other fibers, f.e. PE under 5%
If percentage recycled-content claims are permitted, a defensible approach is to require both a minimum content threshold and a clear substantiation standard.

If percentage claims for recycled textiles are permitted, they must be supported by a clear and robust substantiation standard. A minimum threshold should be meaningful enough to create real environmental impact and avoid misleading claims. The recycled content percentage should be verified through reliable traceability systems, documented supply-chain records, and third-party certification.
Less than 25 % recycled material in final product.
The law has to apply, and there is already certain margins.
50%

Question 19: How should blended products and partial recycled content be addressed in claims and labeling?

Stakeholder feedback
Transparently and easy to understand for end-consumers.
It should be clearly labelled
For mixed or partially recycled products, claims must explicitly state the exact percentage of recycled content alongside the primary material composition. Any claim of 'recycled' without a transparent, verifiable percentage is misleading. Documentation must clearly delineate the ratio, and it must be verified through mass balance audits to ensure the 'recycled' portion is physically substantiated within the final product structure."
Clearly stating the exact % of recycled materials used. Adding a recyclibility scale would be amazing It will bring attention to customers as well to companies
Percentages shall be communicated.
For blended products, the percentage and type of recycled content must be disclosed per fiber component (e.g., “30% recycled cotton, 20% recycled polyester”). Claims must be specific to fiber, not generic. In the case where there is recycled content in a component, it must be clearly mentioned on the label, which component contains the recycled content. Partial recycled content less than 20% should be labeled qualitatively (e.g. “contains recycled material”) with no percentage.
Blended products should be allowed to make recycled-content claims, provided that the percentage of recycled content is clearly stated and refers to the relevant material or component. Products containing both recycled and virgin material should not be labelled simply as “recycled” without specifying the recycled content
recycling content x% with clear marking on which product component it refers.
Claims and labels should clearly identify the percentage of recycled content and specify whether it applies to the entire product, a specific material, or a particular component.
Claims and labels should clearly indicate the percentage and type of recycled content used. For blended products, the recycled content should be disclosed separately from virgin materials to ensure transparency and avoid misleading consumers.
Through a chain-of-custody certification scheme, e. g. ISCC
Claims and labeling could clearly state the weight percentage of recycled content in whole product or main fabric
Should mention proper components

indicando la composizione fibrosa in ordine decrescente di peso e la percentuale esatta di materiale riciclato
Blended products should clearly disclose the percentage and type of recycled content. Labels should distinguish between recycled and virgin materials, specifying whether the recycled content is pre-consumer or post-consumer. All claims should be supported by chain-of-custody documentation and third-party verification to ensure transparency and prevent misleading claims.
Blended products should be allowed to carry recycled-content claims only when the recycled proportion is clearly quantified and independently verified.
-clearify the component and content -the rec material source/origin -recycling process and further processes added -B2B, B2C labelling with certain criterion -impact-oriented claims based on KPI
The recycled content should be claimed in % in the product to distinguish between virgin and recycled content.
It should be claimed exactly as the final product composition, that you can verify. Example - 50% Cotton (100% recycled) 50% Lyocell
Blended products should be allowed to make recycled-content claims, provided the recycled portion is clearly identified and the percentage is accurately stated.
Clearly stating the recycled content, how much and what it is and in which part of the product. On labelling. Claims supported.
Yes, need to note the % exact
This need to be developed separately
Claims must be truthful of course. I believe there is a way to do so while acknowledging that the product may not actually contain physical recycled material due to blending processes. There will be legal issues with making these claims, so those would need to be resolved regionally.
a scale with transparnet data
Claims should identify the relevant material or component, fibre type, recycled percentage, and where relevant feedstock category. For example, “fabric contains 40% post-consumer recycled polyester.” Claims must meet legal requirements in the geographic regions they are being sold.
E.g. 50% post-consumer waste, 50% CO
(translated) In environmental statements and labelling, blended products and those with partial recycled content must be handled precisely, to avoid misleading communications (greenwashing) and to avoid circumventing chemical safety controls.
Only on the product level.
using treaceability's tools and unexpected audits
as done today for virgin materials: list all different compositions
as they are now under GRS
for example: 70% pre-consumer cotton, the percentage of recyled content should be mentioned.
State the exact recycled content percentage (e.g., "40% recycled polyester"). Identify the recycled component (fiber, yarn, or fabric) where relevant. Distinguish recycled from virgin content.
The claims need to be clear they do not apply to the whole garment.
Information regarding % of recycled content. More strict regulations regarding defining the product as Recycled if the content is to low.

Depending on the technological possibilities, maybe blends need to be considered the standard case, at least when using mechanical recycling. Otherwise, 2 different types of claims need to be used to distinguish.
For blended products and partial recycled content, I would recommend a clear percentage-based claim system so consumers cannot mistake a partially recycled product for a fully recycled one
with information of kind of recyclage and his percentage
(translated) the percentage
We whould be able to understand if the recycled content is at the yarn level or if a whole part of the finished product is made in virgin material
Information
Declaring the amount of recycled material is always useful, regardless of the percentage of recycled content. The threshold could serve simply as a minimum requirement for defining a material as recycled: 50%, for example.
Honestly and clearly.
With a mandatory requirement to report the percentage of recycled material.
Should be written to be transparent
Following standards and benchmarks established a priori
according to the EU textile directive
by real precentage
claims should clearly disclose the actual % and type of recycled material in the product. For blends, the claim should identify which fibre/component contains recycled content and distinguish recycled from virgin content. Claim verbiage should not imply that the entire product is recycled and should be backed up by verified CoC documentation.
Depends on requirement
One rule, an unique method of calculation,
the % of recycled materials has to be declared.
Blended products and partial recycled content should be clearly labeled with exact percentages, avoid misleading “recycled” claims, and use standardized certification marks to ensure transparency and trust.
They should be named as 100% originally recycled and blended
That will be check with mass balance and traceability data and confirm claims. This is my suggestion. This is wide question for discussion.
They should be really precise and match the reality of the product (with proof in claims). Transparency is highly important if we want a real change and customers to trust that what they buy really is sustainable.
Specific, percentage-based claims that identify exactly which material or component is recycled. For example, “Contains 40% recycled polyester by weight” etc.
From a data infrastructure perspective, blending is one of the highest-risk points in the chain — it is where recycled and virgin inputs commingle and where attribution becomes hardest to verify. Each input stream entering a blend should carry its own verified chain-of-custody record, and the blending event itself should be recorded as a discrete, timestamped transaction with input quantities, sources, and output yield documented. Claims on blended products should reference the specific input records, not aggregate declarations. Where inputs cannot be individually documented to a verified source, the blended product should not carry a recycled-content claim for that fraction.
Through labels
La nomination de chaque textile présent
Blended products and products containing partial recycled content should be permitted to make recycled-content claims, provided the claims are clear, accurate, quantified, and not misleading. The recycled content

should be expressed as a percentage by weight and identify the specific material, component, or finished product to which the claim applies. Recommended requirements Clearly state the percentage of recycled content (e.g., "Contains 40% recycled polyester by weight"). Identify the scope of the claim: Material level (fiber, yarn, fabric) Component level (e.g., shell fabric, lining) Product level (entire finished product) Specify the type of recycled content, where applicable: Pre-consumer Post-consumer Textile-to-textile Fiber-to-fiber Do not imply that the entire product is recycled if only one component or material contains recycled content. Support all claims with appropriate chain-of-custody documentation, transaction records, and independent verification (or verified mass balance where applicable). Examples of acceptable claims "Contains 60% recycled polyester by weight." "Shell fabric contains 100% post-consumer recycled polyester; trims are not recycled." "Overall product contains 35% recycled content by weight." Claims to avoid ❌ "Made from recycled materials" when only a small portion is recycled. ❌ "100% recycled product" unless every applicable material/component meets that claim. Survey comment Claims for blended or partially recycled products should clearly disclose the percentage, type, and scope of recycled content. Labels should distinguish between product-level, component-level, and material-level claims to ensure transparency and prevent misleading consumers.
Claims should clearly state the exact percentage of recycled content and distinguish recycled and virgin materials. Labels should be transparent, verifiable, and not mislead consumers.
Blended fibers and partial recycled content require clear, verifiable, and understandable claims and labelling to be a real support in customers decision making. As such, claims should only be made if tied to physical presence of the recycled content (no free allocation of any sort should be allowed). Moreover, labelling should be harmonized at EU level such as from 'X% recycled fiber 1 EU Post consumer' meaning that the fiber 1 is made from European post-consumer waste, recycled in Europe and physically present at x% in that final product.

Blended products must be addressed using a strict, mass-proportional percentage label that names the exact material component, preventing vague or generalized statements. The Technical Rules: Component-Specific Transparency: Labels must explicitly tie the recycled percentage to the specific fiber or polymer type, rather than the total product weight alone. Correct: "Fabric contains 60% Recycled Polypropylene and 40% Virgin Polypropylene." Incorrect/Prohibited: "Made with 60% recycled materials." No Deceptive Broadening: If a technical fabric is composed of a recycled polyester warp and a virgin nylon weft, the brand cannot state "Recycled Polyester Fabric" on the front label without immediately disclosing the exact blend ratio. De Minimis Tolerances: A maximum structural variance of 5% is standard to account for mechanical processing deviations, provided the manufacturer can substantiate the targeted blend ratio with verified input receipts.
Blended products should clearly disclose the percentage of recycled content, identify the recycled fiber type, and distinguish between pre-consumer and post-consumer recycled materials where applicable.
By percentage.
Only the total recycled content in the whole product should be communicated
Made with recycling material, then which ones and %
With the exact % of recycled content, a precise chemical content and health information
Specify the exact percentage by weight.
Blended products and products containing only partial recycled content should be labeled in a way that is accurate, specific, and unlikely to overstate the recycled-content attribute. Mass-balance and chain-of-custody systems support allocation and traceability, but claims should clearly communicate what portion of the product is actually recycled
Blended products and partial recycled content require very clear and transparent claims to avoid misleading consumers. Labels should clearly indicate: - The exact percentage of recycled content - The type of recycled fiber used (for example, recycled polyester, recycled cotton, or recycled nylon) - Whether the recycled content is post-consumer or pre-consumer - The verification approach used (physical segregation, controlled blending, or mass balance) For blended products, claims should never imply that the entire product is recycled if only a portion contains recycled material. Clear communication is essential to maintain trust. The future of textile circularity depends on transparency, traceability, and digital systems that can provide accurate information from recycled feedstock to the final garment.

This question is premature. Before discussing how blended products or partial recycled content should be communicated in claims and labelling, the underlying regulatory framework must first be established. In particular, the mass balance approach needs to be clearly defined, including its accounting rules, system boundaries and claim conditions. Furthermore, a robust assessment is needed of which recycled feedstocks are actually available, in what quantities, at what quality and at what cost. The technical feasibility, scalability and economic implications also need to be evaluated. Without this foundation, it is not possible to develop meaningful or enforceable rules for claims and labelling of blended products or partial recycled content. In addition, any future labelling and claims framework must be aligned with the existing and forthcoming EU legislation on environmental claims, including the Empowering Consumers for the Green Transition Directive, the proposed Green Claims Directive where applicable, and the Textile Labelling Regulation. It must be clarified how recycled content claims, including those based on mass balance, can be communicated in a legally compliant, transparent and non misleading way across these legislative frameworks. The priority should therefore be to establish a credible and practical framework before addressing detailed communication requirements.
Post or pre consumer and source should be clearly mentioned.
Follow the law
(translated) by searching for a suitable solution

Question 21: Which stages of the supply chain most need mandatory recordkeeping, and why?

Stakeholder feedback
collection, sorting, pre-processing, recycling, conversion to yarn or fabric, manufacturing Distribution and Retail do not alter the product anymore.
Conversion to yarn or fabric and manufacturing, because the recycled content here direct affects the recycled content of the finished product.
These stages are critical because they represent the primary points where material contamination and undocumented mixing occur. Without mandatory, standardized record-keeping at the collection, sorting, and processing stages, the entire traceability chain becomes fragmented. By enforcing rigorous documentation at these specific points, we can ensure the integrity of the material flow from the very source to the final manufacturer, eliminating gaps that allow for non-compliant materials to enter the supply chain."
Collection - recycling and manufacturing The DPP will do the rest in europe
All stages of the supply chain.
recycling, conversion to yarn or fabric, manufacturing

The most important stages are collection, sorting, recycling and being made into yarn/fabric. Why? Collection/sorting: To check waste origin and avoid fraud (pre-consumer vs. post-consumer). Recycling: to confirm waste was actually processed, and to record yield/loss. Conversion to yarn / fabric: to connect recycled material to the final product rather than to mix it with virgin material without traceability. Records are also necessary in manufacturing, distribution and retail, but are not as high a priority as the risks of contamination or mislabelling are lower at those stages.
Collection | Sorting | Recycling | Conversions to yarn to fabric. Recycling should be subject to mandatory recordkeeping, as this is the critical stage where the waste feedstock is transformed into recycled material and where inputs, outputs and mass balance need to be verified.
collection, sorting and pre-processing
ll critical stages of the supply chain,
Mandatory recordkeeping should be required throughout the entire supply chain, with particular emphasis on collection, sorting, recycling, and conversion to yarn or fabric.
Follow ISCC rules or alike
Recycling processing, yarn/fabric manufacturing and distribution/trade are most required mandatory recordkeeping
Every stage of supply chain is mandatory.
Tutte le fasi della catena di approvvigionamento tessile richiedono oggi una rigorosa tenuta dei registri per soddisfare le normative europee, in particolare il Passaporto Digitale dei Prodotti (DPP) e la Direttiva sulla progettazione ecocompatibile (ESPR)
Mandatory recordkeeping should be required at collection, sorting, recycling, yarn production, fabric manufacturing, and garment manufacturing stages. These are the critical points where material identity, recycled content, and traceability can be lost or altered. Proper records at these stages ensure supply chain integrity and support credible sustainability claims.
Mandatory recordkeeping should be required throughout the supply chain, with particular emphasis on collection, sorting, recycling, conversion into yarn or fabric, and manufacturing.
Collection to finished
recycling(chips, spindope, by-product, colored, uncolored, material) and latest at conversion to fiber/yarn (for actual textile application as B2B product), since the production recipe might differ based on targeted product group and customer request, the point where is it considered as product at gate without bleding is most effective way to track. Collection,sorting, pre-processing might have a bigger impact on social impact which can be in a segment of STeP.
Mandatory recordkeeping is particularly important at collection, sorting, recycling, and blending stages.
Currently traceability and recordkeeping can be secured from recycler to the final goods supplier. However there is a big need to also secure traceability upstream supply chain, where waste collection and sorting is happening. However due to highly unorganized settings, that part of supply chain requires development through collective efforts.
At all stages. These are the critical control points for recycled-content claims.
Sorting and recycling
(translated) Origin
All

Once a good is packed and labeled (typically at manufacturer) then the chain of custody could probably be considered complete for the claim.
pre processing conversion to yarn
All material transformation and ownership-transfer points should maintain records, but collection, sorting, aggregation, recycling, and conversion into yarn are particularly critical. These are the stages where waste status, origin, quantity, composition, and recycled identity are established or can most easily become obscured.
recycling, conversion to yarn
(translated) An objective check on the entire chain of custody requires that record-keeping be mandatory at every single link in the supply chain.
A chain of custody shall not have holes.
pre processing and distribution
See GRS procedure. Collection is not needed. Sorting (COO statement of the PCW) is done with Declaration form. TS starts as of recycled fiber.
collection
From recycling to retail should maintain record keeping, as the composition starts from recycling process.
all above mentioned
recycling, conversion to yarn or fabric, and manufacturing
all of above
Everything where new material will not make an obvious difference any more. SO it should be from pre-processing at least.
For recycled textile claims, mandatory recordkeeping should be strongest at the points where material identity, quantity, and recycled-content attribution can change
all the steps untill the finished product
each step until the finish product
Ideally all of them. Could be an option to have 1 mandatory : conversion to yarn and all the others optional whit a final grade on the traceability (i.e confidence into to recycling process)
Sorting
Collection , sorting, pre-processin, recycling, conversion to yarn or fabric, manifacturing.
All stages should be recorded. Too many stages are also not desirable from a consumer point of view.
All stages from collection to retail
All stages
Ideally, all stages following the same standard, in a consistently integrated way
Mandatory recordkeeping is needed for all stages up to distribution - collection, sorting, pre-pre-processing, recycling, conversion to yarn or fabric, and manufacturing because accurate chain-of-custody tracking relies on records.
Collection, sorting, pre-processing, recycling, conversion to yarn or fabric, manufacturing
manufacturing
collection / sorting > recycling > yarn/fabric > manufacturing > B&R keep track of claim substantiation records
All levels required
Retail because is really good
All,
Recycling due to the fact that it is quite critical to determine the elegibility of reclaimed material.

manufacturing
Every stage
Each stage is important, However, the feed point of every production and exit point of each production is quite important to consider for records and in-between production loss. This apply to whole textile supply chain.
All.
Importance of record keeping in different stages. (1) Collection stage - High, (2) Sorting - High, (3) Pre-processing (if exist) - High, (4) Recycling - Critical, (5) Conversion to yarn/fabric - Critical, (6) Manufacturing - High, (7) Distribution, Retailing etc. remaining stages - Moderate.
The stages where the chain-of-custody record is most commonly broken or weakest are: collection (first point of entry — if origin cannot be established here, nothing downstream can be verified); sorting (where material identity is assigned and where mislabelling risk is highest); blending or aggregation (where individual input streams become commixed and attribution becomes difficult); and cross-border handoffs (where documentation requirements change across jurisdictions and records are frequently lost or reformatted). Conversion to yarn and fabric is also critical because it is typically the last stage where a physical lot can be sampled and tested against its claimed origin. Recordkeeping requirements should be mandatory at every custody transfer, but enforcement focus should prioritise these five stages.
Distribution
La séparation et ensuite le recyclage

Mandatory recordkeeping should apply throughout the entire supply chain, with the greatest emphasis on stages where ownership, material identity, or recycled-content attribution changes. Continuous traceability from collection to the finished product is essential to support credible recycled-content claims and prevent fraud or double counting. Recommended stages Supply Chain Stage Mandatory Recordkeeping Reason Collection ☑ Yes Establishes the origin, source, and classification of waste (pre-consumer/post-consumer). Sorting ☑ Yes Documents material identification, segregation, contamination removal, and feedstock classification. Pre-processing ☑ Yes Records shredding, cleaning, baling, or preparation steps, including quantities and losses. Recycling ☑ Yes Critical stage for recording recycled inputs, outputs, yields, process type (mechanical/chemical), and mass balance where applicable. Conversion to yarn/fabric ☑ Yes Maintains chain of custody through spinning, weaving, knitting, and dyeing, where blending may occur. Manufacturing (garment/home textile) ☑ Yes Verifies recycled content in finished products and supports product-level claims. Distribution ☑ Yes Preserves traceability through product transfers and inventory management. Retail ⚠ Limited Primarily retains records supporting consumer-facing claims rather than production traceability. Priority for mandatory controls The highest priority should be: Recycling Sorting Conversion to yarn/fabric Manufacturing Collection Pre-processing Distribution Retail Recommended survey comment Mandatory recordkeeping should be required across the entire supply chain, from collection through manufacturing and distribution, with the most stringent controls at sorting, recycling, and yarn/fabric conversion where the risk of material mixing, loss of identity, or incorrect recycled-content attribution is highest. Records should include material origin, quantities, processing methods, transfers, yields/losses, chain-of-custody information, and certification status to ensure full traceability and credible recycled-content claims.
Collection, sorting, recycling, and yarn/fabric conversion stages require mandatory recordkeeping because these stages present the highest risk of material mixing, loss of traceability, and inaccurate recycled-content claims
From an operational and PRO perspective, the key elements requiring mandatory recordkeeping at each of these stages are: - From collection to recycling information on the feedstock itself, type of textile waste (post-consumer vs. post-industrial), typology of textile (e.g., workwear, household textiles), and country of origin. - From yarn to final product: from a brand perspective, the material type (e.g., recycled PET), the source of the recycled PET (textile-to-textile vs. open-loop), and its geographical origin.

Stage 1: Collection & Sorting (The Waste Entry point) Why: This is the absolute high-risk zone for the entire chain of custody. Once uncertified plastic waste or post-consumer garments are aggregated, their geographic origin and material history become obscured. Mandatory recordkeeping here is the only way to prove the material actually qualifies as diverted waste rather than virgin overflow or factory regrind. Stage 2: Recycling (Chemical or Mechanical Conversion) Why: This is where raw waste is transformed into industrial feedstock (like pellets, chips, or reprocessed fibers). Recordkeeping at this tier is critical because it captures the yield and mass balance calculations. It ensures the recycler is not outputting more "recycled-certified" material than the physical volume of raw waste they inputted.
Collection: To document the origin and classification of feedstock (pre-consumer or post-consumer). Sorting and pre-processing: To record material separation, quality grading, and contamination control. Recycling: To document process inputs, outputs, yields, and mass balance allocation where applicable.
Retail, to enable consumer notification in the event of a recall or other problem.
It depends what kind of recordkeeping is meant: collection and sorting need to know the quantities and kind of material. This must be recorded. The "recycler" must record how much material is produced out of the waste delivered. Further production must have records how much recycled material was used in which products and how much was sold.
From conversion to yarn or fabric to retail
Every stage should be controlled
From textile, yarn to end product
Recycling. This is where waste is legally transformed into a new raw material and where the mass balance is applied.
Not all stages require the same level of recordkeeping. The highest-risk stages are those where material identity changes, materials are mixed, yield losses occur, or recycled-content claims are first created or transferred. These stages should have mandatory, auditable records because they are where traceability can be lost and where inaccurate claims are most likely to arise.
In my opinion, mandatory recordkeeping is needed at every critical control point of the textile recycling supply chain, because the credibility of a recycled claim depends on the integrity of the entire chain. However, the most critical stages are: - Collection: To verify the origin of discarded textiles and prevent mixing with unknown materials. - Sorting and classification: This is one of the biggest challenges in textile recycling. Accurate records of fiber type, color, composition, and contamination level are essential. - Pre-processing and recycling: Documentation is needed to prove the transformation of waste into recycled fiber and to track input/output quantities. - Conversion to yarn and fabric: Records ensure that recycled materials are not lost, diluted, or incorrectly allocated during blending and production. - Manufacturing and labeling: Final claims must match verified recycled content and production data. Distribution and retail records are also important for transparency, but the highest risk of claim failure occurs earlier—especially during collection, sorting, and recycling, where material identity can be lost. The future of textile circularity requires a complete digital traceability system, not only certificates at the final stage. Data must follow the material from waste collection to the final garment.

It is premature to identify specific supply chain stages that should be subject to mandatory recordkeeping before the overall traceability framework has been defined. The first step should be to establish which chain of custody model will apply, how recycled content will be substantiated and verified, and what information is necessary to ensure credible traceability without creating disproportionate administrative burdens. Before introducing mandatory recordkeeping, a comprehensive impact assessment is needed. This should evaluate the administrative and financial costs for companies, the economic feasibility of the proposed requirements, and the capacity of authorities to effectively verify compliance. It should also assess who will be responsible for audits and enforcement, how compliance by manufacturers outside the EU can be ensured, and how market surveillance authorities will be able to monitor compliance across global supply chains. Recordkeeping obligations should only be introduced where they provide a clear added value for traceability and market surveillance. Any requirements should be risk based, proportionate and avoid duplication of existing documentation obligations. Particular consideration should be given to SMEs, as extensive recordkeeping throughout the entire supply chain could create significant administrative and financial burdens without delivering a corresponding benefit.
At collection and sorting level
All
(translated) Recycling

Question 29: What is the single biggest risk that any future approach to recycled textile verification system must avoid?

Stakeholder feedback
Being too complex and difficult to understand, not accepting the current reality.
Misleading claims
The greatest risk to avoid is 'administrative complacency,' where documentation is treated as a substitute for physical reality. Any future system must avoid relying solely on paper-based mass balance without mandatory, batch-specific chemical testing and independent, real-time physical audits. Failure to link accounting records to the actual physical material flow creates a 'black box' that enables fraud and undermines the entire purpose of sustainability certification
Being a new standard towards grenwashing You are a reference in the domain You have to set the example Maybe by adding new certification and grading them So them everyone concerned to the customer to the brand creator to the yarn supplier has transparent information - a strict certification NEEDS to be seen right away as better - you have to graduate and highlight companies that makes efforts toward our environment. Not being a label that everyone has to be "politically correct". You have the power and the recognition to everyone in the market. You have to set the tone.
Too much bureaucracy and administration which increases price and slows down the transition.
the feedstock origin

We have to make sure the system does not let companies make claims about being eco friendly which is also known as greenwashing. The system must have a way to track things that are recycled in an honest manner. This means we need to be able to see what is happening and have other people check that it is true. We are talking about credibility failure from greenwashing. The system has to avoid allowing companies to make claims without being transparent, about it. We need to have a system that's auditable and verified by a third party. This is important to stop greenwashing and credibility failure.
Traceability fraud — the system must ensure that recycled inputs are genuinely sourced, accurately accounted for and cannot be double-counted or falsely attributed.
being to restrictive on eligible inputs
greenwashing
The biggest risk is the potential for misleading recycled-content claims due to insufficient traceability and verification.
Material performance and absence of trace chemicals, traceability and truthful B2C communication
greenwashing
Wrong labels claims
(translated) must absolutely avoid is reliance on undocumented and untraceable paper declarations, which inevitably exposes the supply chain to greenwashing
The biggest risk is the loss of supply chain integrity due to inadequate traceability and unverified recycled-content claims. Without robust chain-of-custody, independent verification, and transparent documentation, the system becomes vulnerable to fraud and greenwashing, undermining confidence among brands, regulators, and consumers.
The single biggest risk is the loss of trust caused by unverifiable or misleading recycled-content claims.
The biggest risk is misleading or unverifiable recycled-content claims. Without robust traceability, transparent chain-of-custody, and independent verification, consumer trust, fair competition, and the credibility of genuine sustainable manufacturers are compromised.
Authenticity of rec material origin
The misleading claims
Lack of traceability.
Traceability fraud / unreliable traceability
Lack of verified content and tracability chain
Harmful substances
Mis leading claims
That the system of record is not able to be reconciled across transaction verification systems. We will probably need multiple ways to verify the flow of recycled materials throughout the supply chain and there most certainly be competing companies/organizations to provide this service. If they don't interoperate then it's all too easy for fraud to happen where there is a financial incentive.
bad actors. false data
Creating a verification system that is so restrictive in its definition of acceptable feedstock that it excludes legitimate recycled waste streams, while failing to focus sufficiently on the real issues of traceability, double claiming and claim integrity. The objective should be credible use of waste as a resource, supported by robust evidence.
No standardized or unambiguous recycling designation

(translated) The greatest risk that any future textile recycling verification system must absolutely avert is the decoupling of documentary compliance from the product's real chemical and physical safety — a drift that could be described as greenwashing legalised by accounting.
all too narrow focus on inner-EU post-consumer food-contact approved polyester fibres, that are not bleached by sunlight - but practical atom efficiency focus!
We can't think this way anymore... At the stage of systemics approach such as ESPR and DPP are dealing with
if process is too complicated, to much administration, requires double work then the proces is not doable
The greatest future risk is not the availability of recycled claims, but the availability of high-quality, traceable recycled feedstock. Regulations should therefore prioritise robust traceability, investment in textile collection and recycling infrastructure, and harmonised verification systems, rather than introducing unnecessary barriers to the use of recycled materials.
The method and feasibility of transfering the matrails data to buyers.
greenwashing
Content claim fraud
If the verification system is to complicated or resource intensive
Traceability fraud and use of virgin instead of recycled materials.
The single biggest risk is greenwashing caused by weak or broken traceability—especially allowing a recycled-content claim to be made when the evidence cannot reliably connect the claimed recycled material to the actual production volume or product
Product quality degradation
product qulity degradation
Traceability is the main focus to satisfy in the future
Fire risk
would avoid environmental and social audits, since every country in Europe has its own specific legislation and there are agencies responsible for enforcement.
The risk that the consumer does not trust the product is the greatest risk. If the consumer cannot understand the product or what it really is or how it was made, it is a potentially fatal risk.
Not compatible with other systems leading to manual handling
Loss of credibility because of fraud
The single biggest risk is in social labor impacts of collection, including use of low-wage or informal workers in unsafe or unsanitary conditions and potential exposure to hazardous materials.
Apply with EU directive (composition)
Traceability Fraud
loss of claim integrity due to unreliable traceability - where recycled content, origin or % cannot be reliably verified from feedstock through the finished goods, resulting in unsupported or misleading claims.
IMProper TC
Textile yes is very important
Fraud,
To certify as "recycled" products made with not eligible reciclable materials.
Traceability fraud
Hazardous substances
Unsurety and un controlled waste raw materials that will going to use to make consumables and standard recycle materials.

It show avoid having low levels of requirements.
The biggest risk is greenwashing. This includes allowing recycled content claims that cannot be independently tracked, verified, or substantiated.
Platform dependency. A verification system that requires calling a single operator's database — even a trusted certifying body's database — to confirm a claim is not a verification system; it is a trust relationship. If the platform is unavailable, discontinued, or compromised, every claim it supports becomes unverifiable. If the operator is acquired or changes terms, access to records can be restricted. If the platform holds the only copy of the evidence, it controls the truth. The verification system must be designed so that any authorised party can verify a claim independently, without requesting access from the certifying body, the brand, or any other supply chain actor. This requires that the evidence underpinning each claim be anchored to a record that is publicly verifiable and durable beyond the lifetime of any single platform. This is not a theoretical risk — it is the failure mode of every previous generation of digital traceability system, and it is the design requirement that current DPP infrastructure must not repeat.
Contamination
(translated) Hazardous products
Weak traceability leading to unverifiable recycled-content claims, fraud, double counting, and greenwashing. Robust chain-of-custody and independent verification are essential to maintain trust and market credibility.
Misleading recycled-content claims and lack of traceability, which can undermine consumer trust and the credibility of the entire recycled textile industry.
The Chain of Custody methodology should make Tier 4 eligible for certification. Therefore, the specificities of a continuous chemical process that manages various types of textile waste feedstock (e.g., post-industrial versus post-consumer) from different geographical origins (e.g., from various European Member States) should be considered and clearly defined.
The total reliance on administrative documentation ("paper tracking") without physical mass-balance cross-verification at the primary collection point. The Technical Reality: The single greatest failure of first-generation verification systems was treating transaction paperwork as infallible proof. If a verification system only tracks records after the recycling process, it remains completely blind to fraud occurring at the very entry point of the supply chain—the raw waste collector. If uncertified collection facilities can easily generate fraudulent Reclaimed Material Declaration Forms (RMDFs) or aggregate unverified material without independent baseline verification, the entire downstream digital chain of custody (including the Material Ledger) effectively acts as a tool that legalizes fraudulent volume.
Traceability loss
Untraceable fraud.
Having unverifiable data on the materials. Labelling products with a recycled content of less than 20 or 30% Inadequate monitoring during audits
Contamination and hazardous substances
Lack of standards across EU and no DPP from imports
Risk of double counting.

the system must never allow more recycled content to be claimed than actually exists in the supply chain. This is the risk that most directly undermines trust in recycled-content claims, regardless of whether the system uses segregation, mass balance, or another chain-of-custody model
The single biggest risk that any future recycled textile verification system must avoid is loss of trust caused by inaccurate or misleading recycled-content claims. If the system cannot guarantee reliable traceability, prevent double counting, and verify the true origin and percentage of recycled materials, it will undermine confidence in textile circularity. A successful system must be built on transparency, digital traceability, independent verification, and clear accountability across the entire value chain—from collection of textile waste to the final garment.
See (also available in englisch): https://textil-mode.de/de/newsroom/blog/ergebnisse-des-forschungsprojekts-rezyklate-nachweisen-am-textilen-en/
Hazardous substamces
(translated) Production

Question 30: Are there any legal, technical, or policy issues not covered above that you would like to highlight?

Stakeholder feedback
The future of credible textile recycling hinges on a mandatory, standardized, and interoperable digital platform for supply chain tracking. Certification bodies must transition from periodic, paper-based assessments to continuous, data-driven monitoring. Furthermore, a clear legal framework establishing strict liability for misleading environmental claims is essential to ensure that companies prioritize actual sustainability over marketing narratives. Moving forward, 'transparency by design' must become the industry default.
% of material loss during transformation Quantified impact of the recycling process Micro plastics realeased analysis for each product we now need proofs and explanation towards this topic
1. Harmonization of definitions – Lack of EU-wide harmonized definitions for "pre-consumer," "post-consumer," "textile-to-textile," and "fiber-to-fiber" recycling creates confusion and enables greenwashing. 2. Chemical recycling claims – Need clear rules on what qualifies as "recycled" for chemically recycled materials, including mass balance allocation and purity requirements. 3. Digital traceability infrastructure – Need for interoperable digital systems (e.g., blockchain, DPP) to ensure real-time traceability without excessive administrative burden. 4. Enforcement and market surveillance – Current lack of enforcement mechanisms and penalties for false claims undermines the credibility of any verification system. 5. Sorting technology limitations – Current automated sorting cannot reliably distinguish fiber composition in blended textiles, limiting accurate recycling and traceability.

6. Global supply chain complexity – Need for international mutual recognition of certification schemes to avoid duplication and facilitate cross-border trade.
A key issue is the need for harmonised definitions and calculation rules across markets and certification schemes, to ensure comparability and avoid multiple interpretations of “recycled material”. It is also important to consider circularity and end-use prioritisation, particularly avoiding the diversion of materials from established closed-loop recycling systems into lower-value applications.
Availability of recycling material especially textile to textile
Avoid unnecessary administrative burden provide clear, practical, and consistent requirements across the textile supply chain.
Clear differentiation between textile-to-textile recycling and non-textile recycling is important to promote genuine circularity in the textile industry.
Cost and performance
During the ECO PASSPORT certification process, using the cleavage method to determine the content of p-anisidine is overly strict. Some dye components, such as Basic Yellow 28, do not contain p-anisidine linked by an azo bond, yet the cleavage method still releases a significant amount of residual p-anisidine.
Farm level
(translated) Fragmentation and Responsibility, Limits of Industrial-Scale Recycling, Environmental Dumping and Protectionism,
Future recycled textile verification systems should prioritize global harmonization of standards to avoid multiple and conflicting compliance requirements. The framework should be practical and scalable for micro, small, and medium textile enterprises (MSMEs), particularly in developing countries, by reducing unnecessary administrative burdens while maintaining high standards of traceability, product safety, and transparency. Digital solutions such as Digital Product Passports and standardized data exchange should be encouraged to simplify compliance and improve supply chain integrity.
Future requirements should prioritize international harmonization of definitions, traceability, and verification methods to avoid multiple, conflicting systems across markets. Certification schemes should be interoperable with regulatory frameworks, including the Digital Product Passport and Extended Producer Responsibility, while avoiding duplicate reporting obligations. Requirements should remain risk-based, proportionate, and practical for companies of different sizes. Finally, standardized digital data exchange and globally recognized terminology will be essential to improve transparency, reduce administrative burden, and strengthen confidence in recycled textile claims.
Global harmonization of recycled-content definitions, testing methods, and certification requirements is essential. Standards should remain practical, science-based, digitally traceable, and affordable for SMEs while preventing fraud and ensuring consistent international compliance.
Green hushing & Green claim, transparancy, synergy with other certificates(ECP, STeP, MIG) via role of Audit
Harmonization of definitions and requirements across diferent standards and regulatory frameworks. Practical implementation requirements for SMEs and not only, ensuring that compliance obligations remain proportionate and feasible. Clear communication rules to ensure that recycled-content claims are understandable, accurate, and not misleading for customers and end users. Ease the waste transport and regulatory requirements for own recycled material collection with high traceability, actual regulations and frameworks can be easlely missunderstood and to complicated to implement across the value-chain making the recycling unfeasible economicaly and at human resources level.
Harmonization of EPRs and tolerances of Textile Labelling Regulation.
Harmonized definitions, calculation methods and verification requirements across recycling pathways and certification schemes should be established. The system should also ensure interoperability with EPR and Digital

Product Passport requirements while keeping requirements risk-based and practical for supply-chain actor.Proportionality for lower-risk supply chains so requirements remain practical and economically feasible.
how content can and should be mixed with virgin content (fibre types) for end of life management downstream.
Human health
In the US there isn't regulatory clarity coming anytime soon at a federal level with regards to green claims. This means brands need to have consumer research to ensure credible claims. This is likely to be a barrier when thinking about making mass balance claims.
Insurance. make the claim. back it up with insurrance
It is critical that different accreditation and certification schemes complement and recognize one another rather than creating competing systems. Schemes that do not recognise credible assurance provided by other standards create duplication, additional cost and complexity, and ultimately slow the industry's ability to make progress. Different schemes can provide assurance at different points and for different risks. For example, Textile Exchange's Materials Matter, replacing GRS and RCS, can provide a leading chain-of-custody framework, including controls extending upstream into the raw-material stages of the supply chain. OEKO-TEX STANDARD 100 can provide complementary assurance on harmful substances and the safety of textile materials for their intended use. By recognizing and building on credible assurance provided by other schemes, standards can reduce duplication while maintaining robust controls. This allows the industry to operate more efficiently and focus resources on driving meaningful impact for people and the planet. Requirements should also be designed to accommodate emerging recycling technologies. Definitions and verification rules should be technologically neutral while remaining strict on waste eligibility, material accounting, chain of custody, chemical safety, yield calculations and prevention of double claiming. Recycled content and textile-to-textile circularity should not be treated as synonymous. Textile-to-textile recycling is an important pathway for developing a more circular textile industry. However, other legitimate recycled waste streams are also valuable sources of textile raw materials and should remain eligible. Future systems should therefore avoid creating an unnecessary hierarchy of recycled feedstocks. Instead, they should require transparent identification of feedstock origin, waste classification, recycling pathway and recycled percentage.
Lack of technology for cotton-to-cotton recycling – currently only possible mechanically, with significant loss of quality.
(translated) The legal status of "End-of-Waste" (cessation of waste classification), the precedence of binding regulation over voluntary standards, the worsening release of microplastics and microfibers.
One may Highlight harmonized definitions and verification standards, clear mass-balance/chain-of-custody rules, independent audit and testing requirements, and clear allocation of legal responsibility when recycled-content claims are inaccurate

One structural issue not addressed above: the interoperability gap between certification schemes. Recycled textile supply chains cross multiple certification boundaries — a material may be certified under one scheme at fibre stage and a different scheme at fabric or product stage. Currently, there is no common data standard that allows a claim certified in one scheme to be verified against the underlying records by a party operating in a different scheme. This forces brands to re-collect data that has already been collected and verified upstream, and it prevents regulators and market actors from seeing the full chain. Open, interoperable data standards — GS1 Digital Link identifiers, EPCIS 2.0 event structures, W3C Verifiable Credentials — already exist and are converging as the foundation for Digital Product Passports under ESPR. OEKO-TEX has an opportunity to align its certification data model with these standards now, so that OEKO-TEX-certified data becomes natively readable within any standards-compliant DPP system without a bespoke integration. BSV Association's open-source reference implementation (dpp.bsvb.net) demonstrates how certification-event data can be anchored to a public, independently verifiable record within this standards framework. We would welcome the opportunity to discuss this with OEKO-TEX directly.
Origin of waste must be recorded
Several additional issues merit consideration in any future recycled textile verification system: Harmonization of definitions and terminology across international standards to avoid inconsistent interpretations of concepts such as recycled material, pre-consumer/post-consumer waste, textile-to-textile recycling, and fiber-to-fiber recycling. Alignment with existing regulatory frameworks (e.g., Digital Product Passport (DPP), Extended Producer Responsibility (EPR), ecodesign requirements, and international chemical regulations) to minimize duplicate reporting and reduce compliance costs. Interoperable digital traceability through standardized data formats and digital chain-of-custody systems to facilitate secure information exchange across the supply chain. Technology-neutral requirements that recognize both mechanical and chemical recycling pathways, provided equivalent levels of traceability, transparency, and verification are achieved. Risk-based compliance, allowing verification, testing, and due diligence requirements to be proportionate to the risk profile of the feedstock, recycling pathway, and supply chain. Recognition of third-party certification and mutual recognition to reduce duplicate audits where equivalent accredited certification systems already exist. Clear governance of mass balance accounting, including transparent allocation rules, prevention of double counting, and independent verification. Protection of commercially confidential information, ensuring that traceability requirements provide sufficient transparency without requiring disclosure of sensitive business information. Support for SMEs, through practical, scalable documentation and reporting requirements that do not create disproportionate administrative burdens. International consistency, so that recycled-content verification requirements are globally recognized and facilitate international trade rather than creating conflicting regional obligations. Overall, the future system should prioritize transparency, scientific credibility, interoperability, and practical implementation while remaining flexible enough to accommodate technological innovation and evolving regulatory requirements.
Standards should be globally harmonized to avoid duplication between certifications. Requirements should be practical and cost-effective for small and medium-sized manufacturers. Digital traceability, chain-of-custody verification, and alignment with EPR and Digital Product Passport requirements should be encouraged.

The verification methodology must be set at EU level and applied uniformly; divergent national approaches to chain-of-custody would create fragmentation. This must be matched by robust enforcement. Today, only 82 out of every one million goods entering the EU are checked against EU compliance standards, and between 55% and 81% of third-country e-commerce goods do not comply with EU standards. Imported textile products should be subject to requirements regarding recycled content, environmental compliance, traceability and social standards equivalent to those imposed on EU producers. Where green certifications cannot be verified due to limited supply-chain transparency, the EU should prioritize operational enforcement measures, including third-party verification in the exporting country, so that claims can be checked before goods enter the EU market. Control and enforcement today remain primarily the responsibility of national authorities, with uneven resources and implementation across Member States. The establishment of the EU Customs Authority provides timely momentum to strengthen common risk management, coordinate controls and reduce these enforcement disparities. Without effective enforcement, internal circularity requirements risk being offset by external flows. More broadly, the design of the recycled-content methodology should prioritize the development of the European circular textile value chain, with enforcement linked to that industrial policy objective.
Three major operational challenges require deep attention as the industry transitions to unified frameworks: 1. The Operational Friction of the Materials Matter Standard (MMS) Transition As Textile Exchange mandates the shift to the unified Materials Matter Standard (MMS), intermediate Tier 2 and Tier 3 manufacturers face substantial data overhead. Transitioning from managing distinct material silos (like GRS for recycled synthetics and animal welfare standards for wool) to a singular, multi-impact outcome framework requires significant operational updates to internal ERP networks. 2. The Data Interoperability Gap for the Digital Product Passport (DPP) While policy frameworks emphasize the importance of the DPP, a major technical bottleneck remains: system-to-system interoperability. There is an urgent need to align standard supply chain software via open APIs so that data moving through central systems like the Material Ledger can instantly map into the standardized formats required by EU customs registries, avoiding redundant manual data entry for producers. 3. The Structural Math of Eco-Modulation in Technical Textiles For technical and industrial fabrics, mechanical performance is tied to structural safety factors. Current EPR eco-modulation fee systems are largely optimized for consumer fashion apparel. Policy developers must account for technical textile realities; if an industrial producer must use a percentage of virgin polymer to preserve required tensile strength and UV stabilization for regulatory safety compliance, the eco-fee structures should not disproportionately penalize them compared to low-performance retail consumer goods.
verification system should be internationally harmonized to avoid conflicting definitions and duplicate compliance requirements across different schemes Some countries has no regulation for textile recycling and DPP
What penalties should apply to countries like the United States should it refuse to enforce or comply with international recycling policies or regulations?
When introducing a verification system for recycled materials, it must be clarified how to deal with the informal sector involved in collection and sorting.
Which resources have been used for recycling? For example reused water, green energies, sustainable processes for the recycling
Yes All for import textiles and products

Yes, as far as I am aware, recycled synthetics are worse than the originals. Yes, we should use natural fibres.
Yes. Beyond claims, thresholds, chain of custody, testing, and recordkeeping, there are several cross-cutting legal, technical, and policy issues that are often overlooked but can determine whether a recycled textile verification system succeeds or fails.
Yes. One important area that needs further attention is the global harmonization of standards, definitions, and verification methods for recycled textiles. Currently, differences between regulations, certification systems, and regional requirements can create confusion and barriers for companies operating across international markets. From a technical perspective, future systems should address: - Standardized definitions of recycled content and recycling processes - Reliable methods for fiber identification and material verification - Digital traceability systems such as Digital Product Passports - Clear rules for blended products and mass balance approaches - Strong controls against double counting and greenwashing From a policy perspective, collaboration between governments, brands, recyclers, and technology providers is essential to create a transparent and practical framework that supports real circularity rather than only compliance.
Yes. Overall, the consultation appears to focus primarily on environmental objectives while giving insufficient consideration to economic feasibility, product conformity, competitiveness and practical implementation. Before introducing detailed regulatory requirements, it is essential to assess the actual availability of recycled feedstocks, their quality, quantities and costs, as well as the technical feasibility and scalability of the proposed measures. Equal attention should also be given to the administrative burden for companies, particularly SMEs, the costs of compliance, the capacity of market surveillance authorities, and the enforceability of requirements across global supply chains, including manufacturers outside the EU. In addition, the interaction with existing and forthcoming EU legislation, including the Empowering Consumers for the Green Transition Directive, the proposed Green Claims Directive and the Textile Labelling Regulation, should be clarified to ensure a coherent and legally robust framework for recycled content claims. Without addressing these aspects, there is a significant risk that future requirements will not be economically viable, practically enforceable or effective in achieving their intended environmental objectives.
Yesss... if a certificate is withdrawn from any institute ...there must be full investigation before any other institute issuing the certificate to same client.
Your timing to adress this is to late. BUT the main problem is LACK of Knowledge in management and operative levels. So focus on education!