

Textile & Garments — Indicative DPP Data Requirements

Digital Product Passport dataset specification and staggered implementation timeline for textiles and garments. Based on ESPR Articles 7, 9–11, Annex I and Annex III. Delegated act not yet adopted — this document reflects the regulatory framework and EU Textile Strategy preparatory work.

Primary regulation

Regulation (EU) 2024/1781 · In force 18 July 2024

Textile priority

Article 18(5)(c) · First working plan: April 2025

DPP framework

Articles 9–11, Annex III · GS1 Digital Link standard

Textile strategy

EU Strategy for Sustainable and Circular Textiles, 2022

01 — Overview & Scope

All garments, clothing accessories and textile products covered by the textiles delegated act (Article 4, ESPR). Includes knitted and woven apparel (HS 61–62), leather apparel (HS 4203) and household textiles. Footwear covered by a separate, later delegated act.

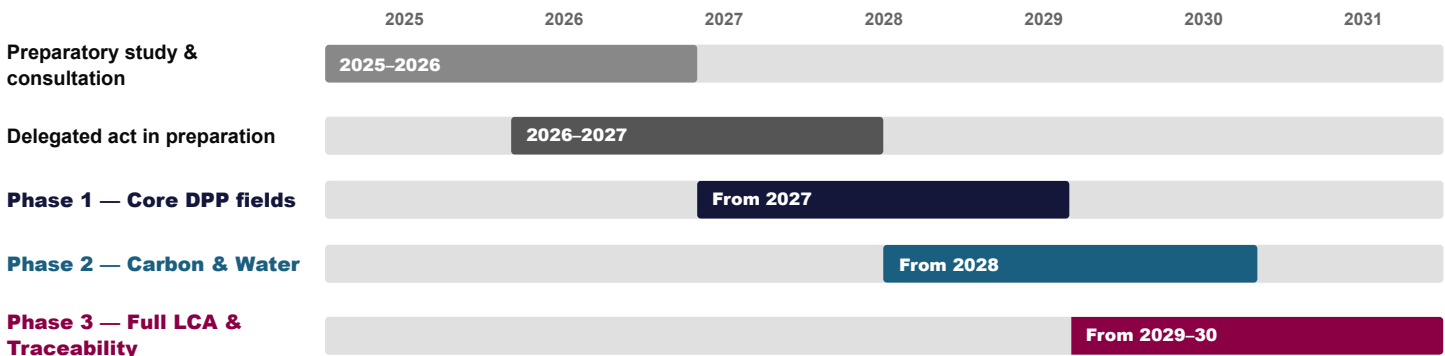
Under Article 9(1), products may only be placed on the EU market if a valid DPP is available via a data carrier (QR/barcode/RFID) on the product, packaging or documentation. All data must be machine-readable, open-format and interoperable per GS1 Digital Link (id.gs1.org).

The delegated act will set specific application dates per field — core identity and substances data required from day one; LCA-based metrics phased in as methodology matures.

02 — Key Dates

Mar 2022	EU Strategy for Sustainable and Circular Textiles published
Jun 2024	ESPR Regulation (EU) 2024/1781 in force. Textiles listed as first working plan priority, Art. 18(5)(c)
Apr 2025	ESPR first working plan published. Textiles Wave 1 — preparatory study launched
2025–26	JRC preparatory study. Defines scope, parameters, performance classes and DPP fields
2026	Ecodesign Forum consultation. Draft delegated act published for comment
2027	Textiles delegated act expected adoption. Phase 1 DPP applies from this date
2028	Phase 2 — carbon footprint, water footprint, traceability required
2029–30	Phase 3 — full LCA, supply chain traceability, recyclability class

03 — Implementation Timeline



PHASE 1 Core Fields — Mandatory from Delegated Act Application Date		Est. from 2027	
DATA FIELD	DESCRIPTION	TEXTILE-SPECIFIC NOTE	LEGAL BASIS
Unique Product Identifier	Persistent UID linked to a data carrier (QR/barcode/RFID) on the product, label or packaging. GS1 GTIN-14 recommended.	Per garment or batch level as specified in delegated act	Art. 10 (a) (b) Annex III (b)
Manufacturer Operator ID	Unique operator identifier for the manufacturer responsible for placing the product on the EU market.	Brand owner in most textile supply chains	Annex III (g)
Country of Manufacture	ISO 3166-1 country code for the facility where the product received its final substantial transformation.	Often separate from country of fibre origin — both required	Annex III (i) Art. 27 (7)
Fibre Composition	Percentage by weight of each fibre type per EU Textile Labelling Regulation (EU) 1007/2011.	Already required on label; DPP extends to machine-readable format	Annex I (h) (i) Art. 7 (2) (b) (i)
Recycled Content (%)	Verified % of post-consumer (PCR) and post-industrial (PIR) recycled content by weight, traceable to certified input streams.	GRS or RCS certification expected as verification route	Annex I (h) Art. 5 (1) (k)
Substances of Concern	IUPAC name, EC/CAS number, location, concentration (% w/w). Threshold: 0.1% w/w for SVHC. Includes PFAS, azo dyes, formaldehyde, heavy metal mordants.	PFAS in waterproofing treatments and REACH SVHC in dyes are the priority declarations	Art. 7 (5) (a) – (e)
Durability Score	Performance class: pilling (ISO 12945), tensile strength (ISO 13934), colourfastness to washing (ISO 105-C06) and rubbing (ISO 105-X12).	EU performance class to be defined in delegated act — likely A–E scale	Art. 7 (2) (b) (i) Annex I (a)
Repairability Score	Seam accessibility, spare parts availability (buttons, zips, patches), repair instructions availability, modular construction.	First product group with mandatory repairability score under ESPR	Art. 7 (2) (b) (i) Annex I (e)
Care Instructions	ISO 3758 care symbols plus washing, drying, ironing, bleaching and dry-cleaning instructions in machine-readable form.	Extends existing label requirement to DPP digital format	Art. 7 (2) (b) (ii)
End-of-Life Instructions	Sorting category, collection instructions, reuse/donation guidance, recycling stream compatibility and disassembly guidance for trims.	Must align with EU EPR schemes for textiles (in force 2025)	Art. 7 (2) (b) (ii) (iii)
Declaration of Conformity	Reference to declaration of conformity demonstrating compliance with the applicable delegated act.	Standard across all ESPR products	Annex III (e) · Art. 44
Back-Up Copy	Back-up of the DPP held with a registered DPP service provider. Must remain accessible after business cessation.	Standard across all ESPR products	Art. 10 (4) Art. 11 (c) (e)

DATA FIELD	DESCRIPTION	TEXTILE-SPECIFIC NOTE	LEGAL BASIS
Carbon Footprint (kg CO₂e)	Quantified lifecycle GHG emissions per product unit. Methodology per EN ISO 14067 or PEF-based approach as specified in delegated act.	Raw material production typically 60–80% of total; scope 3 critical	Art. 7(2)(b)(i) Annex I(n)
Water Footprint (litres/kg)	Freshwater consumption across product lifecycle in litres per kg of finished product. Based on ISO 14046 or equivalent.	Cotton production uses ~10,000L per kg — key differentiator for sustainable textiles	Annex I(g) Art. 5(1)(i)
Microplastic Release	Estimated grams of microfibre/microplastic released per wash cycle. Based on ISO/CEN test method under development.	Polyester, nylon and acrylic products; filter bag indication required	Annex I(p) Art. 7(2)(b)(i)
Production Facility IDs	GS1 GLN or equivalent for dyeing, finishing and cutting/sewing facilities. ISO country code and address at minimum.	Enables audit trail for substances of concern across supply chain	Annex III(i) Art. 9(2)(g)
PFAS & Azo Dye Declarations	Explicit declarations for PFAS in DWR treatments and restricted azo dyes releasing carcinogenic amines. Concentration and location required.	PFAS in outerwear DWR and azo dyes in dark garments are highest-risk categories	Art. 7(5) Art. 5(1)(g)
Third-Party Certifications	Certificate number and expiry date: GOTS, OCS, RCS/GRS, Oeko-Tex STANDARD 100, EU Ecolabel, Bluesign, Cradle to Cradle.	Voluntary in Phase 2; will inform performance class verification approach	Annex III final § Art. 7(2)(b)(iv)
GTIN & TARIC Codes	Global Trade Item Number (GTIN-13/14) and Combined Nomenclature/TARIC code for customs and market surveillance.	HS Chapters 61 (knitted), 62 (woven), 63 (household textiles)	Annex III(c)(d)
Importer Details & EORI	For non-EU goods: importer name, address, unique operator ID and EU EORI number. Enables customs DPP access.	Critical — majority of EU textile consumption is imported	Annex III(j) Art. 29(3)

DATA FIELD	DESCRIPTION	TEXTILE-SPECIFIC NOTE	LEGAL BASIS
Environmental Footprint (EF)	Full multi-category LCA using EU PEF methodology. 16 impact categories: climate change, eutrophication, land use, water scarcity, ecotoxicity.	PEF Category Rules for apparel (PEFCR) already exist — most advanced product group	Art. 7(2)(b)(i) Annex I(m)
Full Supply Chain Traceability	Facility IDs for all stages: raw material, spinning, weaving/knitting, dyeing/finishing, cut-make-trim. GS1 GLN per facility at enhanced level.	Textile supply chains span 6–8 countries; Tier 2/3 mapping is the primary compliance challenge	Art. 9(3)(a) Annex I(f)
Recyclability Class	Standardised class (A–E or A–G, to be defined) based on fibre homogeneity, non-fibre components (zips, buttons, coatings), sortability and recycling infrastructure compatibility.	Blended fabrics (e.g. 65% PES / 35% CO) typically Class D–E under current mechanical recycling	Art. 5(1)(m) Annex I(d)
Take-Back Scheme Reference	Named EPR scheme(s), scheme ID, geographic coverage and consumer collection point locator.	EPR for textiles operative in France from 2023, expanding across EU	Art. 7(2)(b)(ii) Annex I(r)
Actor-Differentiated Access Rights	Differentiated access by actor: consumers (care/repair/recycling), repairers (instructions/parts), recyclers (composition/disassembly), authorities (full technical file), customs (GTIN/EORI).	Substance concentration data restricted to authorities and professional operators	Art. 11(b) Art. 9(2)(f)
Linked DPP Chain	Refurbished or second-hand product DPP must link to the original. Enables lifecycle tracking across multiple owners.	Relevant for resale platforms (Vinted, Depop) and clothing-as-a-service models	Art. 11(d)
Full DPP Interoperability	Semantic and technical interoperability with DPPs from other product groups — relevant for smart garments incorporating electronics.	Smart/e-textiles require interoperability between textiles and electronics DPP frameworks	Art. 11(a) Art. 10(d)

No delegated act adopted yet. All data fields, performance classes, methodologies and phase dates are indicative, derived from the ESPR regulatory framework (Articles 7, 9–11, Annex I, Annex III), the EU Textile Strategy (2022), and the Commission preparatory study timeline. The exact content will be determined by the delegated act and its accompanying preparatory study.

Footwear excluded. Footwear is expected to be covered by a separate, later delegated act following garments. Footwear-specific DPP fields (sole material, adhesive type, component replaceability) will be set in that separate instrument.

Existing Textile Labelling Regulation. Regulation (EU) 1007/2011 already requires fibre composition labelling. The ESPR textiles DPP extends these requirements to machine-readable format. Manufacturers already disclosing fibre composition will find Phase 1 compliance straightforward.

EPR schemes. Extended Producer Responsibility for textiles is being implemented progressively across Member States. France's EPR (Refashion) has been operative since 2023. The ESPR DPP will need to interface with national EPR scheme registries.

Sources: Regulation (EU) 2024/1781 (ESPR) · EU Strategy for Sustainable and Circular Textiles COM(2022) 141 · ESPR Working Plan 2025-2030 · EU PEF Category Rules for Apparel (PEFCR) · CPR Working Plan 2026-2029 COM(2025) 772