For our environment

Umwelt Bundesamt

ECHT Traceability Conference

Draft ECHT Policy Action Plan

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Interreg North-West Europe
Co-funded by the European Union
ECHT

Draft ECHT Policy Action Plan

- The draft ECHT policy action plan contains recommendations for policy makers and authorities .
- It is based on findings from the ECHT project (e.g. policy workshop), discussions in a working group, expert interviews with stakeholders, literature and internet searches.
- It aims to improve the current situation and to contribute to the goals of the EU Strategy for Sustainable and Circular Textiles:

By 2030

- textile products on the EU market are long-lived, recyclable, to a great extent made of recycled fibres, free of hazardous substances and produced in respect of social rights and the environment.
- Fast fashion is out of fashion.
- Producers take responsibility for their products along the whole value chain.

The Interreg ECHT project: traceability influencing factors

	Influencing Factor	Points Sum	Relevance / Category
1	Regulatory framework EU for traceability of chemicals in textiles	14	high relevance
4	Enforcement pressure in the industry	26	
3	Standardisation on EU- and global level	28	
15	Cooperation along value chain on aspects of traceability	31	
2	Regulatory framework global for traceability of chemicals in textiles	33	
12	Mindset in the industry	45	medium relevance
13	Traceability capacity in the supply chain	46	
7	Innovations in Traceability Technology	49	
14	Cooperation among peers on aspects of traceability	52	
9	Consumer behaviour	55	
5	Scientific Knowledge about chemical substances	64	
10	Critical public opinion	70	low relevance
8	Innovations textile technology	72	
11	Location factors (political, social, economical, ecological)	74	
6	Innovations in Detection methods	78	
16	Traceability related Business Models	79	

The Interreg ECHT project: Brussels Workshop

Participants of the last Workshop in Brussels:

- **Chemical industry**: BASF, DOW, Sika Services, LANXESS
- **Textile industry**: Blutsgeschwister, H&M
- **Associations**: Euratex, Finnish Textile & Fashion, VDM
- **NGOs**: ChemSec, ClientEarth, ECOS, Zero Waste Europe, HEJ Support
- **Authorities**: European Parliament, EU COM, nat. authorities (BE, LU, DE)
- **Other:** GS1 Netherlands, ISC3, Michelin, Sympany, Neovili, Circular.Fashion, TripleR, University Darmstadt

https://echt.nweurope.eu/report-policy-workshop

Expert working group and expert interviews

- **Interviews** conducted so far:
  - PUMA, Blutsgeschwister (textile industry)
  - NimkarTek (Indian consultant and certifier),
  - Sympany (sorter),
  - German meta association Textil+Mode, GUT (DPP flooring).

- **Expert working group**
  - Blutsgeschwister, Neovili, Zero Waste, Ecos, EEB, Client Earth, HEJ Support, University Darmstadt,
  - Sika, BASF, VCI,
  - EU COM, nat. authorities (BE, DE, LU)

- After report: manual for national helpdesks; discuss in what way other sectors could be covered

→ **Continuous exchange with WG**

(Comprehensive) Traceability

- Traceability in the context of this Policy Action Plan (PAP):

> "means the possibility to trace back which chemicals are present in which component of an article […]. In its most comprehensive form, traceability describes the concept of passing on information on material composition down to substances level throughout the entire value chain as full material declaration."

- We assume a step-by-step political process in which all stakeholders must be involved
- Aim is to achieve comprehensive traceability of chemicals in the long term

This draft PAP does not consider process chemicals that are used during the production process and do not (intentionally or unintentionally) end up in a product

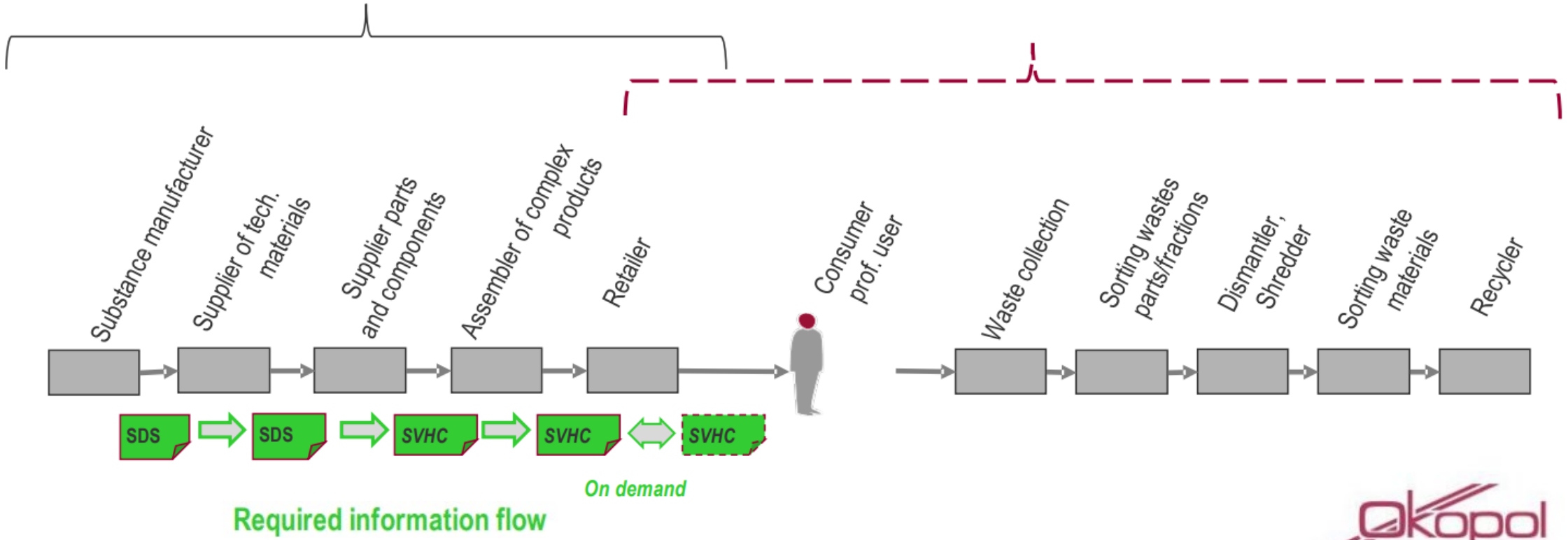
Objectives Policy Action Plan

1. Make sure the information provided meets all stakeholder needs
2. Developing standards and an appropriate data system
3. Set up EU harmonised legal information requirements
4. Involve, support and incentivise actors
5. Improve compliance and enforcement
6. Promote global harmonisation
7. General supportive measures

Stakeholders associated with the textile value chain

Communication along the supply chain
(Mostly) implemented: SVHC & restricted substances
Sometimes implemented: further substances of concern
(via sector lists, contracts)

Communication in the waste treatment chain
Not implemented: SVHC, restricted substances and substances of concern
=> Current information gap



Reference: Ökopol, UBA Texte 28/2024

Measures: Make sure the information provided meets all stakeholder needs

- **Establish a common standard material data set** in collaboration with all relevant stakeholders
- **Ensure traceability data is accurate, up-to-date, and accessible** to relevant stakeholders (e.g., consumers, recyclers, authorities) on a need-to-know basis, while protecting business confidentiality

Example: companies in textile value chain need information for

- occupational safety
- more sustainable decisions (e.g. SSbD: safe and sustainable by design approach)
- certification
- substantiating green claims
- reporting duties (CSRD, IED, Taxonomy Regulation)
- information duties (e.g. REACH Art. 33)
- due diligence duties (CSDDD)
- compliance with restrictions (e.g. REACH, POP Regulation)
- waste classification

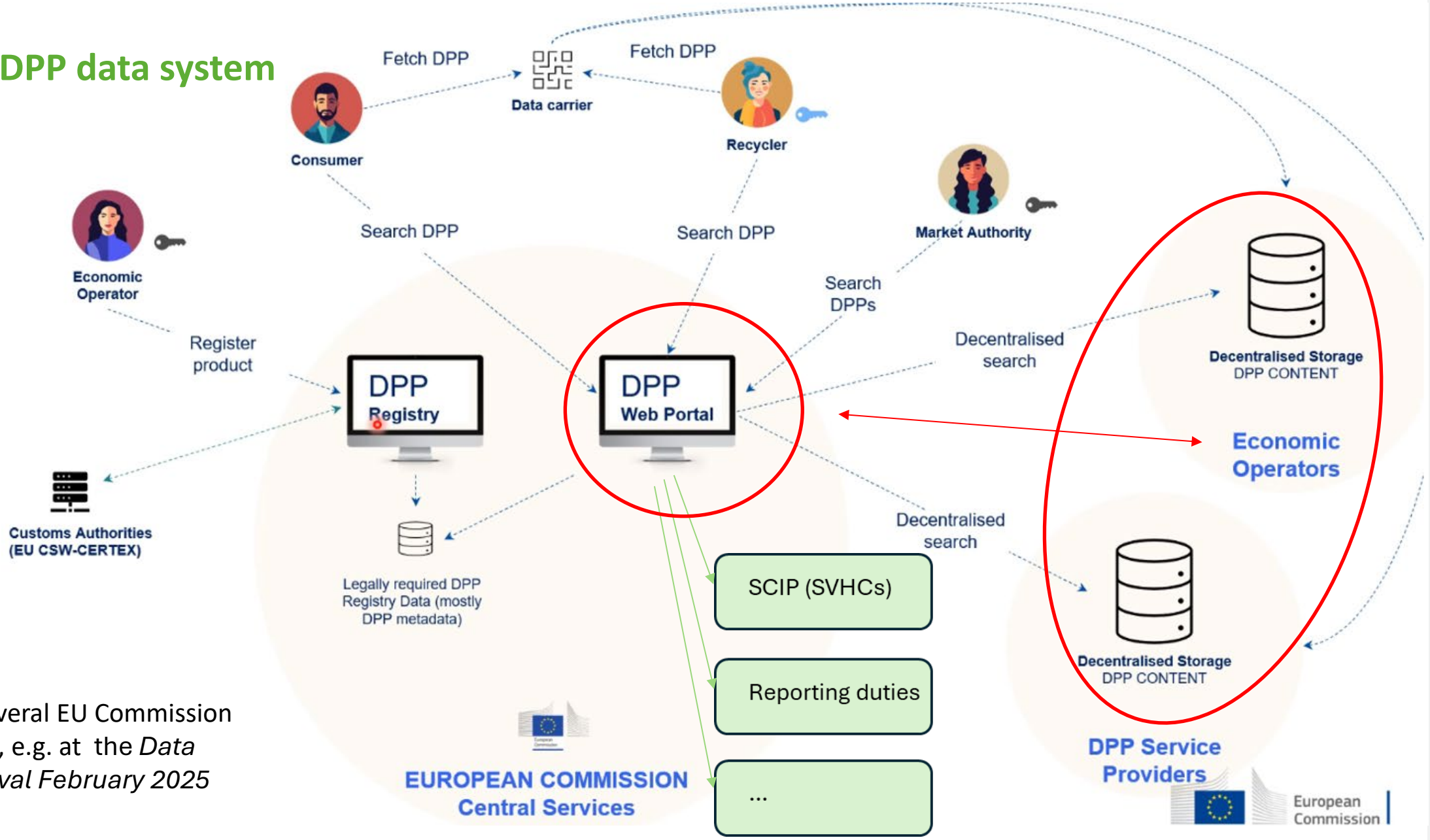
WHAT is needed?

Measures: Developing standards and an appropriate data system

- **Develop a Common Standard** for data collection, transmission, and storage, ensuring transparent and reliable data sharing across the value chain.
- **Report Once Approach**: Store all article-specific chemical information once in one place. A governance framework distributes relevant data to, e.g. DPPs or SCIP, for example, and gives different actors access on a need-to-know basis → reduced bureaucracy. Allow voluntary data submission beyond compliance.
- **Appoint an Independent Entity** to manage the traceability governance framework, maintain its rules, and monitor compliance.
- **Choose a Data Carrier** to connect physical articles with digital information, enabling easy access to article-related data.

HOW can data be handled?

Planned DPP data system



Reference: several EU Commission presentations, e.g. at the *Data Sharing Festival February 2025*

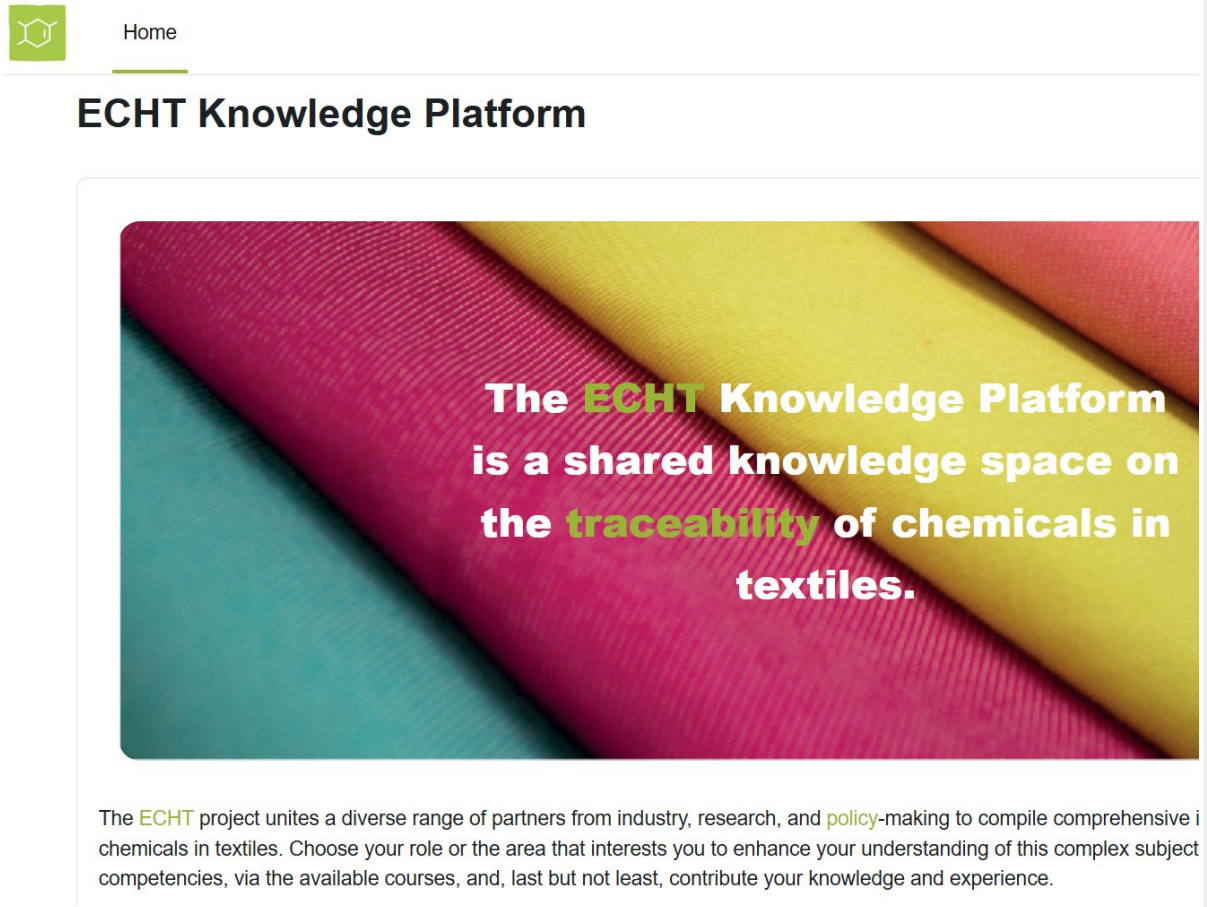
Measures: Set up EU harmonised legal information requirements

- **Develop an EU traceability strategy** to address chemical traceability across sectors, defining minimum data requirements and ensuring interoperability
- **Harmonise legislation/information requirements** across legal provisions to reduce bureaucracy
- **Implement traceability provisions** within existing laws, with gradual tightening of information requirements, and allow companies to go beyond legal obligations
- **Create a central Substance Reporting List** (SRL) to streamline (regulatory) substance reporting, to reduce the burden on SMEs

WHAT should be legally binding?

Measures: Involve, support and incentivise actors

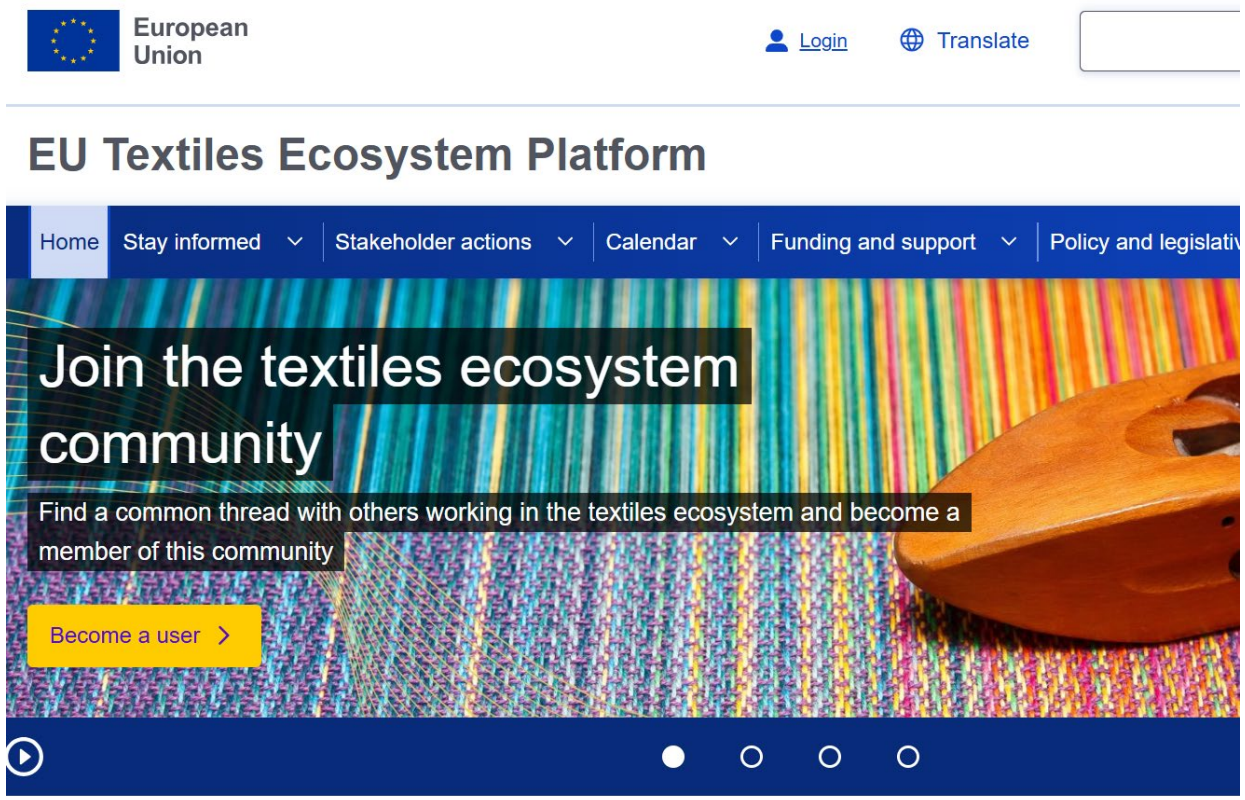
- **Engage textile sector stakeholders** in developing traceability standards
- **Support SMEs** with EU-wide digitalisation programs, offering training, digital tools, and compatible traceability software
- **Implement a tiered incentive system** to reward companies adopting traceability data beyond legal compliance
- **Collaboration should be encouraged by authorities**, fostering partnerships for traceability data use across the lifecycle
- **Promote knowledge-sharing platforms**



https://knowledge.trace-chemicals.eu/

Measures: Involve, support and incentivise actors

- **Support research and innovation** by establishing a transdisciplinary research cluster for comprehensive traceability, SSbD, promoting innovation and rewarding sustainable practices
- **Provide funding** for (AI-based) recycling technologies to improve efficiency
- **Raise consumer awareness** through campaigns promoting "slow fashion" practices, such as repair and reuse.
- **Include traceability requirements** beyond legal compliance in eco-label criteria/certification schemes and public procurement requirements



https://transition-pathways.europa.eu/textiles-ecosystem

Measures: Improve compliance and enforcement

- **Implement a monitoring strategy** for online marketplaces
  - ➢ recommendations from the textile industry (e.g. mandatory EU economic operator for every product, stronger customs rules)
  - ➢ Explore the role of AI in supporting authorities in tracking non-compliant articles (e.g., missing or incorrect chemical information).

- **Establish confidential reporting mechanisms** for supply chain actors to report traceability violations within companies
- **Ensure a gradual sanction system for non-compliance**, linking market access to meeting minimum traceability and data governance standards
- **Explore certification organisations' role** in verifying the accuracy, completeness, and timeliness of companies' traceability data during their checks

Measures: Promote global harmonisation

- **Harmonise GHS classification** to eliminate system differences (e.g., CLP vs. GHS)
- **Advocate for international traceability standards** and a harmonised global data system
- **Include traceability in international agreements** (e.g. Stockholm Convention), EU trade agreements and sustainable product partnerships
- **Promote voluntary initiatives** like UN Chemicals in Products Programme (CiP), aligning with industry best practices and the GFC for coherent traceability
- **Provide a global, open-source knowledge platform** for guidance, training, and tools on traceability
- **Use certification systems/public procurement** to drive compliance by making (comprehensive) traceability of chemicals a requirement
- **Fund research and pilot projects** on cost allocation and incentives to support environmental upgrades in global supply chains

Introduction World Café

- World Café Format: Collaborative brainstorming in small groups (4-6 persons)
- Parallel Discussions: 3 Groups work simultaneously on different topics
- Rotating Groups: After **15min intervals**, participants switch tables
- Building on Expertise: Start at the table where you feel you can contribute most, so others can build on your ideas
- Topics for Discussion:
  - Report-once approach
  - Comprehensive traceability
  - Recycling
- The results will be shared and discussed in an open session at the end
- Online discussion via White Board section on Teams

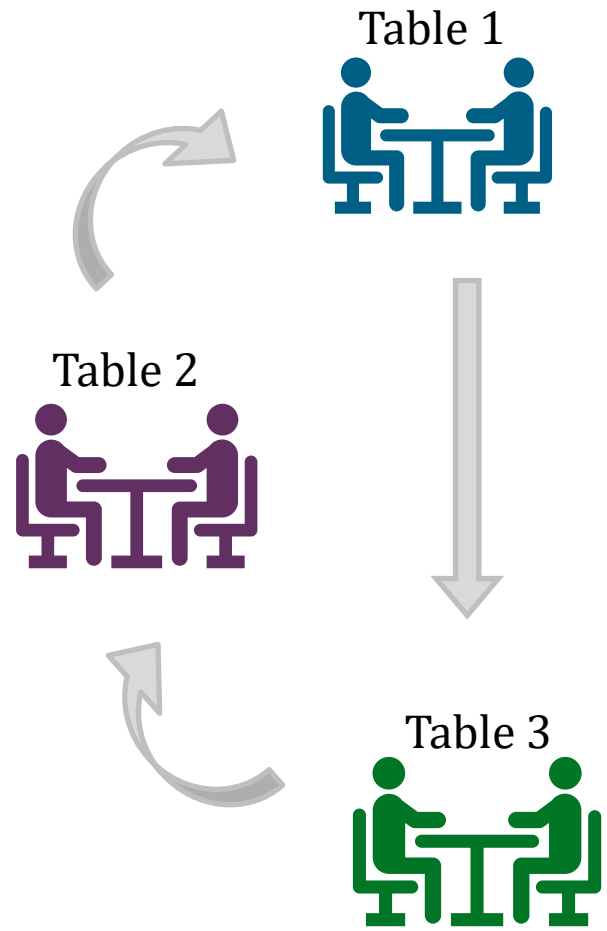


Table 1: Report-Once Approach (Dörte)

*“….better harmonisation between chemicals and the wide range of other product legislation is needed, e.g. to **introduce a 'report once' approach** so that data only needs to be **submitted once** and can then be used under the different regulatory frameworks.” (Brussels workshop 2024)*

How can we best implement such a report “once only” approach? Where is the data stored/Who is storing it?

What does this imply for the necessary governance framework? How can we ensure easy accessibility for stakeholders on individual need to know basis and use of data under different regulatory frameworks?

How to store and make use of “beyond compliance” data?

Table 2: Comprehensive Traceability (Eva)

“In its most comprehensive form, traceability describes the concept of passing on information on material composition down to substances level throughout the entire value chain as full material declaration.”

How could comprehensive traceability benefit businesses?

Which barriers would need to be addressed?

What are the potential requirements for comprehensive traceability?

Table 3: Recycling (Lea)

What sort of information and support is required for sorters and recyclers?

What measures could be implemented to facilitate the process for recycling companies (for example, companies collecting textiles, which would then be passed on to the recycler)?

What measures can be implemented to address the issue of consumers removing the label containing the QR code for the DPP?

Results World Café

Results Table 1: Report-Once Approach (Dörte)

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Thank you for your attention

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https://www.umweltbundesamt.de/themen/chemikalien/chemikalien-reach/interreg-echt
https://echt.nweurope.eu/

Measures: General supportive measures

- **Promote a non-toxic, climate-neutral circular textile economy**
- **Support the national implementation of ambitious Extended Producer Responsibility** (EPR) in textiles, including recycling targets under EU Waste Framework Directive
- **Improve REACH,** ensuring better dossier quality, verification, and monitoring of hazardous substances.
- **Clarify how DPP and SCIP database** can complement each other in tracking chemicals
- **Ensure coherence between EU chemical restrictions** and the export of these substances to non-EU countries
- **Promote global adoption of the Globally Harmonised System** (GHS) for chemical classification

Requirements on supply chain actors in Article 38 of the ESPR

- Provide information related to their products to a manufacturer upon request.
- If they are unable to do so, they have to allow the manufacturer to assess their products themselves and grant them access to relevant documents or facilities for this purpose.