



Brussels, April 28<sup>th</sup>, 2010

Member of the European Parliament  
Member of the IMCO Committee

**Report (A7-0122/2010) from Mr. Toine Manders on the proposal of a Regulation on textile names and related labelling (COM(2009)31)**

Dear Member of the European Parliament,

Following the adoption of the legislative report from Mr. Manders on textile names and related labelling within the IMCO Committee on April 8<sup>th</sup>, 2010, **we wish to express our concerns to you regarding some of the amendments passed and invite Members of the European Parliament to refocus on the initial objectives of this proposal when considering the final adoption of the report in Plenary planned on May 19<sup>th</sup>.**

As you know, the proposal made by the European Commission in January 2009 ([COM\(2009\)31](#)) aimed at replacing three existing Directives applying to textile fibres by a unique Regulation and to facilitate the integration of new fibres into the market by enabling the completion of EU legislation through 'comitology'. The final goal pursued was to help the European apparel and textile industry adapt itself to technical change and thus to remain competitive at the international level.

**However, discussions within the IMCO Committee have gone much beyond this limited scope, leading to the adoption of some amendments dealing with very politically sensitive questions or concerning issues going much beyond the apparel and textile sector and the initial scope of the draft regulation. We thus fear that these amendments will lead to the blocking of this important legislation for our sector and wonder if all their consequences have been properly assessed yet – many complex practicalities of labelling (for example Made In, animal-derived materials, etc.) were not investigated whatsoever in the European Commission's impact assessment nor underwent the necessary consultation process needed before drafting any new Regulation.**

The amendments we refer to are mainly those dealing with:

- **Mandatory 'Made In' labelling for textile products imported from third countries, except Turkey and countries from the EEA Agreement (Compromise amendment 3):** we wonder why this amendment has been tabled and adopted in relation to the present text, as a proposal dealing specifically with this issue is currently under discussion within the INTA Committee with Mrs. Muscardini as Rapporteur (proposal for a Regulation on

the indication of the country of origin of certain products imported from third countries ([COM\(2005\)0661](#)), including textile products, also known as the 'Made In Regulation'). As you know, Member states have not been able to agree on this proposal in the last five years, which leads us to think that this important dossier should be dealt with separately.

⇒ **We think that mandatory 'Made In' labelling for products imported from third countries should be dealt within the framework of the discussions on the proposal for a Regulation on the indication of the country of origin of certain products imported from third countries and not in relation with this proposal focusing on fibres' names and labelling. Granting the possibility to the IMCO Committee to deliver an opinion on the 'Made In Regulation' would enable its Members to have their say on this important dossier while avoiding the blocking of a proposal concerning distinct objectives.**

- **Voluntary 'Made In' labelling for textile products imported from EU Member states, Turkey and countries from the EEA Agreement (amendments 83 mainly):** this amendment aims at introducing specific rules at the EU level for determining the origin of products which would be exempted from mandatory labelling.

⇒ **Once again, we consider that such a reform is highly political and has to be dealt with apart from this very technical Regulation.**

- **Future new requirements in the field of textiles' labelling (Compromise amendment 5):** we do not understand the reason why the apparel and textile industry, which mainly consists of SMEs trying to carry on their activities despite increasing international competition, should be subjected to more demanding rules than the other manufactured sectors. Asking the European Commission to promote predetermined rules might lead to an overregulation of the European apparel and textile sector and to the adoption of measures which do not necessarily respond to consumers' demands.

⇒ **A reference to possible new requirements might be made, in our view, in this Regulation, but without any predetermined objectives. Otherwise, political pressure would be exerted on the European Commission to propose new Regulations that might be ill-founded and very much detrimental to the European Apparel and Textile Sector. We would like to insist that no reference at all was included in the initial proposal and that asking the European Commission to make new proposals in the next two years already goes beyond the restricted scope of the Regulation.**

- **Labelling of animal-derived materials (amendment 79 mainly):** due to the fact that very few animal-derived materials are textile fibres, we do not see any reason to create confusion by adding provisions on this matter to the present Regulation. Plus, any possible changes affecting labelling requirements for animal-derived materials require a previous in-depth impact assessment.



⇒ **Animal-derived materials should be dealt with separately and on the basis of adequate research and consultation with stakeholders.**

We would like to thank you warmly for the attention you will pay to this letter sent on behalf of the European apparel, textile, clothing retail, care, fur and man-made fibres' sectors, and hope that the final text adopted will take into account the needs of the SMEs we represent, especially in this context of economic crisis.

Yours Sincerely,

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