

WEBINAR SERIES:

EU Green Deal Policies and their  
Relevance in Asia-Pacific

# EU Ecodesign for Sustainable Products Regulation (ESPR)

Knowledge Brief

switchasia



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## Context

The **EU SWITCH-Asia Policy Support Component** and the **European Environment Bureau** held a **webinar** on the 19 March 2025 about the **EU's Ecodesign for Sustainable Products Regulation**. It is part of a **series of webinars**, which seeks to explore the implications of EU policies related to Sustainable Consumption and Production for its partner countries, particularly in the Asia-Pacific region. It aims to understand the goals of these policies, their relevance in specific contexts, and their implications for stakeholders in the Asia-Pacific, particularly concerning legislation that has emerged from EU policies. This Knowledge brief aims to capture the ideas shared during the webinar but is not a comprehensive analysis of the policy. The webinar focused on clarity and diversity of views, rather than comprehensiveness.

## Key Messages

The EU's Ecodesign for Sustainable Products Regulation (ESPR) was adopted in July 2024. The aim of the ESPR is to make sustainable products the norm on the EU market. As well as updating the EU's existing Ecodesign legal framework, the new law will see Ecodesign expanded to a wider range of priority products.

In line with the aims of the EU's Textile Strategy which seeks to tackle the soaring environmental impact of the sector, textiles as a product group was identified as a clear priority to be tackled through sector-specific minimum Ecodesign performance and information requirements.

The EU ESPR will impact products placed on its market, including those with value chains operating in Asia. The impact is yet to be measured, but the EU welcomes dialogue and partnerships to ensure that consumers worldwide benefit from more innovative and sustainable products.

Digital product passports will raise the bar. ESPR will introduce a digital product passport, requiring full traceability for each item. It's a big step forward for transparency for consumers but will require efforts from producers.

No single actor can make the shift alone; collaboration is needed. The textile sector is highly fragmented. Change will require collaboration across the whole supply chain—from manufacturers to brands to retailers. Stronger partnerships are needed to prepare for the coming changes and to make circular practices the norm.

## Introduction

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The EU SWITCH-Asia Policy Support Component and the European Environment Bureau held a webinar on the ESPR to introduce the objectives of the law and the current status of the processes to develop specific requirements for the textile sector. During this event, several leading experts convened to discuss the importance of understanding the impacts and opportunities for the Asia-Pacific region for EU Importers and Asia-Pacific Exporters when it comes to preparing for the implementation of the ESPR.

## Ecodesign requirements for textiles

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In her overview of the ESPR, **Emily MACINTOSH, Senior Policy Officer for Textiles at the European Environmental Bureau**, explained the intention of Ecodesign requirements to improve a series of product aspects (set out in Article 5 of the law) using product parameters (defined in Annex 1 of the law). Work to develop requirements for apparel textile products is underway (household textiles and footwear are out of scope for now), but the final requirements won't be set until 2026. **Carsten WENTINK, Policy officer at the European Commission, DG Environment** added that it is important to remember that requirements will also only come into force after a transition period of at least 18 months.

Ecodesign requirements will define the legal minimum levels or thresholds for those parameters in order to place a product on the EU market. The requirements can be for both performance or information. Information requirements must include the requirement to make available a product passport which enhances end-to-end traceability of a product.

Potential performance requirements could for example include durability thresholds and minimum standards for pilling, seam slippage and tear strength, in order to improve a textile product's physical durability. Ecodesign requirements covering thresholds for the inclusion of recycled fibers in apparel products could be added to improve recyclability rates and the inclusion of recycled content.

The approach is to set requirements based on the function of end products, meaning that requirements will not be set at the 'intermediate' product level (fibres, yarn, or fabric) but on finished garments.

There are numerous potential benefits of Ecodesign requirements for citizens and for overall circular material use. The introduction of a harmonised definition of high-quality recycling could for example establish a ranking of recyclability classes that will clarify recyclability for consumers as well as the value chain. Ecodesign requirements could also support the phase-out of harmful chemicals by enacting a dynamic 'positive declaration' reporting obligation on the presence of substances of concern in textile products to allow for traceability throughout the value chain.

Work to develop the Ecodesign requirements for textiles has started with the Joint Research Centre (the European Commission's in-house research department) leading a 'Preparatory Study' on apparel textiles (work on household textiles, technical textiles, and footwear is not currently foreseen). The study will be finalised by the end of 2025. Then, in 2026, the study will feed into the European Commission's Impact Assessment of the options for setting the binding minimum Ecodesign requirements through a Delegated Act – a piece of 'secondary' EU legislation that supplements a 'primary' law (in this case the ESPR).

## Risks and opportunities for the Asia-Pacific context

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While the specific Ecodesign requirements for apparel textiles are not finalised yet, their adoption will have clear implications for global value chains where countries and regions import textile products into the EU market. It is therefore important for the actors of the value chain to be aware and involved now, to avoid that higher production costs associated with, for example, meeting requirements for recycled content or traceability requirements associated with the Digital Product Passport end up being absorbed by the most marginalised in the value chain.

**Carsten WENTINK, Policy officer at the European Commission, DG Environment** highlighted the importance of “*understanding impacts on third countries to avoid setting requirements that will lead to widespread non-compliance*”. He added: “*The long-term goal for the ESPR is for it to be the instrument to reach the goals of the Textile Strategy, to make the consumption and production of textiles more and more circular. It is an essential tool as part of a broader package of instruments.*”

In her presentation, Emily Macintosh highlighted the risk that the overweighting of physical durability in the requirements will inadvertently favour the synthetic fibres which drive the fast fashion business models the EU Textile Strategy is seeking to curtail (as synthetic fibres outperform natural fibres in durability tests due to high tensile properties). In addition, there is a risk that taking a “fibre neutral” approach in the setting of the requirements will mean low thresholds that synthetic fibres can easily meet, running the risk that it could be cheaper for companies to comply with Ecodesign simply by incorporating synthetic fibres.

**Zainab NAEEM, Head of Ecological Sustainability & Circular Economy, Sustainable Development Policy Institute (SDPI)** told participants that there has been a lot of concerns regarding the ESPR in the Asia-Pacific as it will create challenges for exporting countries given that recyclability and traceability require a lot of investment in terms of both manufacturing, raw material extraction, and agriculture. She cited the fact that in Pakistan they are grappling with the impact of climate change on cotton production. She cited concerns over whether the Generalised Scheme of Preferences Plus status would be retained in the case of non-compliance with the ESPR and the need for more capacity building to map emissions and develop sustainability reporting. These additional costs will be borne by suppliers preparing to export to the EU.

Zainab also highlighted that many countries in the Asia-Pacific region do not have their own policies on circularity, and that there is not much awareness of the ESPR and it will be hard to prepare for compliance by 2027 while the details regarding the requirements are still in development. In her view, the dialogue therefore needs to start now. Zainab also highlighted that Pakistan is a global leader in the repurposing and recycling of textile waste. Pakistan is a leading importer of used textiles with a large informal sector. Zainab added: “*We are managing the textile waste crisis that developed regions of the world are creating. If we are able to manage it, if it is possible for us to comply with ESPR, why not give certain relaxations to help regions build their capacity, through dialogue on how the regulation can be equitable.*”

## Circular innovations and possible solutions

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To mitigate potential risks and allow for non-EU countries to benefit from opportunities arising from regulation, the European Commission expressed openness towards dialogue and willingness to provide flexible deadlines where it makes sense.

**Mark Draeck, Industrial Development Officer, Energy Systems and Infrastructure Division, UNIDO** described his work towards helping companies maintain competitiveness through innovation. Based on knowledge from the Bangladeshi context, he noted that fragmentation is a specific problem of the textiles sector. It is not possible to create change by working with just one actor, which is why alliances with brands and retailers are absolutely necessary. He added that capacity, knowledge transfer, and financing are also measures to improve.

Recommendations regarding post-industrial textile waste are plentiful (some are outlined in this [report](#) from Chatham House for Bangladesh in the short-medium-long term), and it will be important to interlink on-the-ground knowledge with legislative decisions.

Fundamentally all actors are willing, but they are, according to Mark Draeck, not ready yet. He noted that it would be beneficial for governments in developing countries to have clarity and incentives through tax reform and other fiscal instruments to give investors clarity and confidence – a prerequisite for scaling up circular business models.

**Rene VAN BERKEL, Circular Economy Expert, SWITCH-Asia Policy Support Component** discussed the importance of unleashing innovation when it comes to circularity and showed how many companies are already adopting circular practices in the region.

While the **ASEAN Circular Economy Business Alliance** has worked on guiding principles, Rene outlined how the majority of companies are not yet engaged in the circular economy and that the concept remains ambiguous and abstract. He listed a variety of business cases across Asia (see below), ranging from resource waste reduction in factories in Indonesia, to silk alternatives in Cambodia, to mesh fibre-to-fibre recycling in Thailand, as well as innovative business models with pay-as-you-use mattresses and other subscription-based models.

The circular business case is evident through such models, as they allow companies to be more efficient, open up to new markets, and save money through resource efficiency. “We need to get out of the traditional mindset that textile and garments is a low-tech industry,” said **Rene VAN BERKEL**.

Ultimately, he argued, the biggest investment needed is in capacity, and the ability of the sector to scale these opportunities. Enabling SMEs to adopt new technologies will be crucial. Businesses, small and large, need to know what the opportunity is, where they can save costs, and where they can be ahead of the demand.

**Closing the discussion, Dr. Zinaida FADEEVA**, Team Leader, SWITCH-Asia Programme, noted that the ESPR shifts the focus from waste management to innovation and design of products or business models. Innovation shapes how the entire textile industry operates.

## Conclusion

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The Ecodesign for Sustainable Products Regulation (ESPR) will impact all products placed on the market in the EU, therefore also those produced in Asia. The impact is not clear yet, because the performance and information requirements have not been defined yet, but the European Commission welcomes input and exchanges during the period of preparation.

As mentioned by Carsten Wentink during the discussion, it is important for the European Commission to evaluate the potential impacts on third countries, and not set requirements that will lead to widespread non-compliance. The JRC Preparatory Study on textiles is publicly available, and any new input – especially impact data – will be taken into consideration.

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Watch the recording [here](#).

