



ETAD
Ecological and Toxicological Association
of Dyes and Pigments Manufacturers

ETAD comments on proposals for revision of the criteria for the EU Ecolabel for textile products

Some concerns about the current revision proposals will be addressed later but first some more general comments on ETAD's stance regarding ecolabelling:

- ETAD supports the efforts to develop the EU ecolabel as a policy tool in relation to sustainable consumption and to achieve harmonisation of the criteria.
- So far the EU ecolabel for textiles has not found widespread acceptance. In the revision process now underway it is important that an attempt be made to assess whether the costs involved are justified in terms of sustainable environmental benefits.
- Consideration needs to be given to trade implications. Although the ecolabelling schemes are voluntary, they can pose significant barriers to trade, especially for developing and less-advantaged countries.

With regard to the specific proposals for revision of the criteria for textiles, ETAD's main concern is the proposal to ban all substances which are classified as dangerous and assigned the risk phrases R50, R51, R52 and R53. The classification of these substances is a "Hazard" classification not a "Risk" classification. The environmental risk posed in their use in textile dyeing depends on several other factors, notably their "exhaustion" in the dyeing process. A sweeping exclusion of all R50-R53 substances would severely constrain the choice of dyes for many textiles and is not acceptable in the absence of any credible case being made in terms of environmental benefits.

The emphasis on **product**-based criteria rather than **process**-based criteria in the current criteria is understandable and continues in the proposed revision. However, the testing requirements to check compliance with the criteria add substantial costs to the manufacturing chain. Greater importance should be attached to ensuring that the **processes** used in the manufacturing chain of ecolabelled products meet good environmental standards.

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