European Data Union Strategy
Call for evidence – 18 July 2025

EURATEX, representing the European textile and apparel industry, welcomes the Commission's initiative to develop a European Data Union Strategy. The industry supports the goal of **creating a more coherent, efficient, and secure framework for data use**, recognising its potential to drive innovation, reduce administrative burden, and improve competitiveness across industrial ecosystems. The European textile and apparel sector is made up primarily of SMEs operating in complex, often global value chains. These companies generate and manage substantial amounts of data (ranging from material composition and process parameters to supply chain traceability and product lifecycle information). However, most of this data remains fragmented, underutilised, or locked in proprietary systems. While recent legislation such as the ESPR or CSRD introduces important digital requirements, it also adds complexity. **SMEs often face multiple reporting obligations** that differ across legal instruments, with inconsistent timelines, data definitions, and technical formats. **The strategy should address the administrative burden faced by textile SMEs**, who are often disproportionately affected by fragmented and overlapping reporting requirements. **Promoting interoperability and ensuring that data-related obligations are streamlined and proportionate would make it easier for these companies to comply without diverting resources away from core business activities.**

EURATEX encourages the Commission to use the Data Union Strategy to introduce horizontal tools that harmonise data requirements, streamline access to reporting platforms, and avoid duplication. Common formats, modular taxonomies, and digital-by-design principles should guide the development of new obligations. These efforts should build on and align with existing initiatives such as the Digital Product Passport and the Data Spaces framework, while ensuring continuity and clarity for operators. **Reducing regulatory fragmentation and improving the practical usability of EU data rules** would help create a level playing field and encourage companies to invest in data capabilities.

Beyond regulatory alignment, the strategy should help close the gap in access to data infrastructure and support mechanisms. Despite growing interest in digital solutions, most SMEs in the textile and apparel sector **lack access to relevant training datasets, shared computing resources, or experimentation environments.** This undermines the sector's ability to adopt AI tools, optimise production, or develop circular models. **EURATEX supports the creation of domain-specific data pools and digital resource centres**, linked to EU-level facilities such as AI factories and EuroHPC. In parallel, **data-sharing initiatives must be adapted to the realities of SME networks**, ensuring that participation does not rely on disproportionate legal or technical capacities.

As a globally connected industry, textiles depends on lawful and predictable international data flows. However, **divergent requirements on cross-border data exchange**, and the growing complexity of compliance with third-country rules, create operational risks. **The Data Union Strategy must be aligned with a coherent international framework that secures the EU's economic interests while maintaining openness.** Policy coherence with trade, standardisation, and industrial policy is essential to ensure that the strategy delivers benefits for European producers. The textile and apparel sector, already at the intersection of multiple regulatory and market pressures, **needs a data environment that is not only secure, but also practically navigable and competitively fair.**

EURATEX calls for a Data Union that supports the real economy by removing barriers, enabling voluntary data use, and **building infrastructure that reflects the needs of all ecosystems** (not only large platforms or tech sectors). **European industry will only benefit fully from data if the frameworks are operational, legally sound, and accessible to all actors.** The Strategy should strengthen this foundation by reducing fragmentation, simplifying obligations, and **connecting industrial sectors to the wider digital transformation effort.** EURATEX remains committed to contributing to this process and to representing the voice of a sector that plays a key role in Europe's economic and technological future.

Key points:

- Streamline reporting obligations for SMEs by aligning data requirements across ESPR, CSRD, and other relevant legislation.

- Develop horizontal data governance tools, including common formats, taxonomies, and interoperable digital reporting systems.

- Establish textile-specific data spaces and ensure access to EU-level infrastructure such as AI factories and EuroHPC.

- Adapt data-sharing frameworks to the capacities of SMEs, avoiding legal and technical requirements that create barriers to participation.

- Safeguard lawful international data flows by ensuring coherence between EU trade, data protection, and industrial policy.

- Focus the strategy on strengthening industrial competitiveness by ensuring the data framework is accessible, secure, and usable for all sectors (not only large platforms).