

POSITION PAPER

Public Procurement

Enhancing Europe's Strategic Autonomy
by Supporting Local Content and
Industrial Capabilities

DECEMBER 2025

EURATEX, as the voice of the European textiles and apparel industry, supports an ambitious EU agenda that positions public procurement as a key driver of sustainability, circularity, innovation, and fair competition. The European textiles and clothing sector is highly globalised, with annual exports exceeding €60 billion and imports over €100 billion. Our industry is actively engaged in the circular and digital transitions, contributing to the supply of sustainable, high-quality products, including those made from recycled and recyclable materials, while advocating for a level playing field that rewards responsible production and supports European manufacturers.

EURATEX's recommendations are divided into three chapters to address the specific needs of each procurement area: (1) General Public Procurement, (2) Green Public Procurement, and (3) Defence Procurement.

1. GENERAL PUBLIC PROCUREMENT

Textile products are widely used across a broad range of public services, from hospital linens, surgical gowns, and emergency response gear to school uniforms and public transport upholstery. Many non-textile goods purchased through public procurement also contain essential textile components, such as mattresses, upholstered furniture, insulation, or thermoformed parts in transport vehicles, that are fundamental to the product performance. Such applications highlight the strategic relevance of the textile sector across multiple domains of public procurement. Europe is home to important textile companies that invest to create high-quality, durable, and high performing textile applications. Therefore, public procurement represents an important market, and safeguarding their competitiveness and skilled workers is instrumental for achieving a European strategic autonomy.

In certain categories of public procurement, where technically feasible, recycled contents from European Textile waste streams and recyclable products should be mandated. For the European Union, textile recycling is strategic, not only for environmental and climate reasons, but also for economic competitiveness due to the scarcity of raw materials available. The adoption of recycled materials and design for recyclability are essential to improving the environmental performance, reducing dependence on virgin resources, and minimising end-of-life waste.

EURATEX welcomes the European Commission's new Single Market Strategy, placing public procurement at the centre of efforts to strengthen Europe's industrial competitiveness, emphasising "Buy European" preferences in critical sectors, greater use of non-price criteria such as sustainability and resilience, and enhanced support for SMEs and mid-cap firms.

1.1 Low bids

While there is a valuable opportunity for textile companies to supply high-value products, European textile manufacturers face high competition from overseas low-cost producers, which often do not comply with similar quality and sustainable standards as European companies do in their production. Currently, Member States prioritise procurement based solely on the lowest price, often sourcing from companies operating in regions where environmental and social sustainability standards are lacking. As a result, the concept of “value for money” is frequently reduced to cost alone, undermining the procurement of high-quality and sustainable goods. To address this, the definition of “value for money” should be expanded to include life-cycle costs as well as social and environmental impacts, including product durability. Where possible, the definition should also account for the use of recycled contents and the product’s recyclability at end-of-life.

Lowest prices offered by foreign companies are often the result of firms being either subsidised or state-owned, which receive direct or indirect financial support, shielding them from potential financial burdens. Allowing such firms to participate in public procurement tenders creates an implicit asymmetry, as European companies typically do not benefit from equivalent support. This results in unfair competition and limits the ability of European businesses to successfully compete in and win tenders. Stricter oversight of abnormally low bids from non-European countries should be introduced to ensure that imported textiles operate under the same financial conditions and meet equal EU standards, including recycled content and recyclability requirements where applicable, fairly competing with European businesses.

To ensure compliance, especially from cross-border bidders, data quality and authority capacity are needed. The current framework has contributed to increased transparency and accountability, helping to reduce non-compliant goods and improve ethical standards. However, access to information and the clarity of tender documents still need to be improved. Security considerations are often not properly addressed by contracting authorities, and further clarification is needed on how to expedite procedures in emergencies without compromising transparency.

EURATEX calls for a clearer definition of 'value for money' in public procurement to ensure it is not merely reduced to the lowest possible price and stronger transparency, oversight, and data quality in procurement processes.

1.2 Barriers in administrative procurement procedures

Overly rigid and bureaucratic administrative procedures limit the flexibility to invest in innovative materials and specialised products. SMEs, in particular, need targeted support to compete in markets where price heavily influences procurement decisions.

This support should include improved access to finance and technical expertise, training on navigating procurement processes, and simplified documentation requirements. Additional barriers include language differences, varying national standards, and inconsistent e-procurement platforms, all of which hinder cross-border participation. For instance, the usability of e-procurement platforms remains inconsistent, highlighting the need for further simplification and enhanced user experience. Where possible, automation of repetitive procurement processes through AI-driven tools, such as pre-qualification checks, should also be encouraged.

Furthermore, lowering publication thresholds for smaller contracts and linking procurement datasets with other administrative sources would strengthen oversight and coherence. A promising solution would be the development of a dedicated digital platform for the textile sector, reducing administrative burdens for suppliers, streamlining compliance checks, and providing textile expertise to secure a transparent decision-making process based on sufficient background information.

The Commission's Single Market Strategy also highlights the need to simplify procurement procedures and improve SME access, including through greater digitisation, harmonised e-procurement systems, and more consistent application of digital tools such as electronic invoicing and pre-qualification screening. These measures, if properly implemented, could significantly ease the administrative burden for textile SMEs participating in public procurement. This support is essential to maintaining fair competition and enhancing the competitiveness of EU textile companies.

EURATEX welcomes the simplification of procurement procedures outlined in the recent Internal Market Strategy and urges increased financial and technical support for EU textile SMEs to facilitate their participation in the public tender system.

1.3 Regional sourcing

The EU should mandate greater regional sourcing to reduce reliance on vulnerable global supply chains by strengthening regional textile hubs and value chain from fibre to finished product, advancing innovation through pre-commercial procurement. Public procurement can play a key role in incentivising the development and commercialisation of innovative textile solutions, including smart textiles, sustainable fibres, high-quality recycled fibres, and advanced manufacturing processes, while fostering job creation and local development. However, promoting local sourcing in public textile procurement requires a broader European approach. Key to this is research cooperation, innovation hubs, and strategic partnerships that help companies develop know-how.

To boost capacity in the area of textile procurement, the EU should focus on increasing domestic sourcing in order to strengthen the value chain, but it should also subsequently welcome partner countries as fellow contributors, which are those economies with deep regulatory parity and grounded alliances. Geographical proximity with Europe reinforces sourcing from the same trusted supply ecosystem, which strengthens resilience in strategic sectors. This framing supports the EU's open strategic autonomy around innovation, quality, and sustainability.

1.4 Industrial Tenders

The application of industrial tenders within European public procurement processes is an essential step towards strengthening supply reliability and strategic autonomy. Such tenders require bidders to demonstrate their actual production capacity, ensuring that only companies with proven industrial capabilities can participate. This approach significantly enhances delivery assurance, a factor of utmost importance in times of crisis when timely and reliable supply is critical. Moreover, industrial tenders contribute to greater transparency and traceability across the value chain. By requiring insight into the origin and manufacturing process of products, public authorities gain a clearer view of their suppliers' capabilities and compliance. This not only supports better risk management but also aligns procurement practices with Europe's broader goals of resilience, accountability, and industrial competitiveness.

EURATEX calls for a strong commitment to strengthening European sourcing as a key driver for strategic autonomy, regional development, and economic growth.

2. GREEN PUBLICPROCUREMENT (GPP)

Green Public Procurement (GPP) is a key instrument under the Circular Economy Act to stimulate early demand for sustainable textiles and to foster a market pull for circular products. Where feasible and depending on the technical nature of the goods being procured, criteria on recycled content and product recyclability should be systematically integrated into public tenders. GPP should complement market-driven circularity by ensuring that public tenders reward circularity in a practical, transparent, and SME-accessible manner. The criteria should balance the weight attributed to price with performance and quality considerations, without compromising the functionality of the tendered product or service.

To generate genuine impact, GPP criteria must be both realistic and progressively integrated into procurement guidelines at the product level as a minimum legal requirement to become the norm in public procurement. They should address key circularity aspects such as durability, reparability, recyclability, and, on a voluntary basis, the use of recycled content. Procurement frameworks should be harmonised at the EU level. While flexibility for Member States remains important, GPP should not be entirely optional, as consistency across the EU is essential to create a strong and predictable demand signal for circular textiles.

Green Public Procurement must be aligned with the EU Textile Strategy and the Green Deal. Its social and environmental criteria should be measurable and transparent, based on a common EU methodology. For instance:

- Evidence of the bidder's due diligence processes across the value chain should be properly rewarded.
- Life-cycle assessments should follow a harmonised EU approach, with particular attention to recycled content and recyclability.
- Recognised labels should be listed and applied consistently across member states.
- The Most Economically Advantageous Tender (MEAT) criteria should include mandatory circularity requirements in all textile-related procurement contracts.
- Verification mechanisms should be introduced to ensure that claims made by non-European producers are legitimate.

In this context, stricter oversight of abnormally low bids from non-European producers is needed, ensuring that imported textiles comply with the same standards, including recycled content and recyclability requirements. Measures to enhance the visibility and traceability of these criteria should support both compliance verification and transparency in procurement practices. Since meeting such standards entails significant costs, companies investing in sustainable practices must be properly recognised and fairly rewarded.

EURATEX calls for procurement frameworks to be harmonised at the EU level. While flexibility is important, GPP should be mandatory, as it is needed to create market pull and to have consistency across the EU.

3.DEFENCE PROCUREMENT

In the context of the rising EU defence investment, textile products are fundamental parts of defence systems, playing a crucial role in supporting operational readiness and effectiveness. The textile industry consists of nearly 200 companies providing essential materials for technical uniforms, tents, tarpaulins, ropes, belts, and structural components of aircraft and military vehicles. Consequently, it is important that the textiles sector is recognised for its indispensable role in guaranteeing the operational capacity of the European armed forces. High-quality, durable, and high performing textile applications are paramount to the effectiveness and safety.

The EU should prioritise European-based sourcing and manufacturing for defence-related textiles, build an EU-based reliable value chain from fibre to finished product, supporting long-term strategic autonomy. Alignment with NATO standards and security requirements is necessary, ensuring reliability. While today the EU's defence textile value chain remains underdeveloped, consistent prioritisation of European production will foster industrial capacity, investment, and innovation, reducing dependency on external

suppliers. Where obsolete defence equipment cannot leave the Single Market for security and end-of-life control reasons, there is a natural opportunity to recycle these materials into new goods. Yet companies exploring these approaches need investments and predictable demand; recognising European-made textiles that incorporate recycled fibres within defence procurement can help foster the market conditions that allow such capacities to develop.

The procurement of defence-related textiles should include European content requirements, reflecting the need to strengthen the EU's strategic production capacities. It should also reflect NATO interoperability standards and allow sourcing from trusted NATO partners if reciprocity is guaranteed, to strengthen collective security. As a medium-term objective, the EU should aim to ensure that the defence textile value chain is secure, resilient, and interoperable and takes place in Europe where possible, in line with principles of strategic autonomy, by also leveraging NATO trusted partner capabilities. Participation of non-European countries that are NATO full members, with more mature defence textile markets and greater sectoral expertise, should be possible, based on reciprocity and with appropriate safeguards to address security concerns and ensure fair competition.

EURATEX welcomes the EU Defence Strategy and Defence Readiness Roadmap. However, existing framework such as SAFE, which aims to require around 65% of components in soldier equipment and defence goods to originate in Europe, currently exclude textile products, despite their vital role in defence capability, performance, and safety. Future programs and regulations should prioritise the sourcing of textile components for defence applications originating from European production. Eligibility criteria in EU defence programmes should be risk-based and pragmatic, particularly for defence textiles, avoiding unnecessary requirements such as mandatory EU headquarters and prioritising instead that products are European-made and comply with all security standards.

EURATEX calls for prioritising textile components and products for defence applications coming from the EU, contributing to the development of a strong and resilient European value chain.