

ONE PAGER

Product Environmental Footprint Category Rules for Apparel and Footwear (PEFCRs)

JUNE 2025

The European Commission recently approved the Product Environmental Footprint Category Rules for Apparel and Footwear (PEFCRs), concluding a 5-year collaboration among industry, NGOs, and experts. A standardized European methodology for assessing and communicating the environmental footprint of products is vital for both business and consumers and the PEFCRs offer a foundation to build on.

In the following transition phase, the PEFCRs should be used on a voluntary basis as an asset for companies' competitiveness and to test applicability to real products contributing to future improvements. In view of the ongoing revision of the Environmental Footprint (EF) methods, the development of the new EF Database 4.0, and the need to ensure the fitness of the PEFCRs to inform EU policymaking, the revision of the methodology is not just warranted, but inevitable.

Reflecting on the way forward, EURATEX outlines the following key recommendations:

1. The PEFCRs should be further developed within a **revamped governance framework**, operating on the basis of transparency, inclusivity, and accountability, ensuring fair representation of all value chain actors, including SMEs. It should enable participation of qualified and diverse stakeholders and actively engage in public communication. The European Commission should offer technical expertise and financial support to small actors when needed.
2. Among the **methodological revisions** required, the PEFCRs categories and benchmarking should provide greater granularity in product, fiber, and material for more accurate assessment and to encourage sustainability investments. The durability methodology should better reflect the product durability and also include extrinsic aspects following further research. Holistic fiber fragmentation and biodegradability assessments must be included as impact categories as soon as scientifically proven and standardized methods are available.
3. Open and free access to the **EF Database** should be provided in disaggregated format for companies' use, validation and future updates aligned with new research and industry needs. Public calls for provision of company data under specific conditions should be ensured.
4. Constraints of **SMEs** should be duly considered. Practical support tools, accessible calculation methods, and training can help to enable effective participation and **scalability** of the PEFCRs.
5. The Supporting Studies are crucial for testing the **implementability** of draft PEFCRs, requiring transparent and inclusive participation. The results should be industry experts-reviewed, including their credibility, comparability and meaningfulness, made publicly available, and used to refine the methodology.
6. With emerging parallel international and national methods, such as France's Environmental Cost, EURATEX urges for **EU harmonisation** and voluntary use of the methods to inform the future PEFCRs revision and convergence towards a single European methodology.