

Toward harmonised Textile EPR Systems in Europe: analysis and recommendations

WS1 REDUCING ADMINISTRATIVE BURDEN

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Introduction

The work carried out within the WS1 group, led by Dr, Eng. Viola Corbellini (Erion Textiles, Italy), focused on reducing the administrative burden for textile producers through the harmonisation of procedures. In particular, the group concentrated on two key areas: registration/enrolment in EPR schemes and reporting requirements, both of which are still under development and discussion across countries.

With regard to enrolment, six registration forms currently in use and provided by the PROs participating in the group were collected and compared. This analysis revealed significant potential for harmonisation, as the information requested appears to be largely consistent across all the forms reviewed.

The present document aims to present the results of the survey carried out within the group. The methodology was based on the collection and comparative analysis of to collect key information related to the implementation, or expected/probable future implementation, of the operational model of the PRO responding to the survey highlighting areas of divergence and supporting the development of a possible harmonised model grounded in systematically collected evidence.

It should be noted that the survey, circulated between late October and November 2025, took place during a period of major regulatory change. In particular, it coincided with the revision of the Waste Framework Directive (WFD) of 16 October 2025 and preceded the adoption of forthcoming national implementing legislation on textile EPR. Under the revised framework, Member States will be required to transpose the new rules within 20 months and to establish EPR schemes for textiles and footwear within 30 months of the Directive's entry into force. The evidence collected should therefore be understood as a snapshot of a regulatory landscape that is evolving significantly at both EU and national levels.

Survey: structure and rationale

The survey was designed to collect key information related to the implementation, or expected/probable future implementation, of the operational model of the PRO responding to the survey.

The questions are structured into four main thematic areas:

1. National regulatory framework and EPR scope

This section includes questions aimed at clarifying who falls under the obligations and what is included within the scheme:

- which entities are required to register and report under the national scheme (e.g. “producers” in a broad sense);
- how “producer” is defined and which categories are subject to the obligation (e.g. manufacturers, importers, resellers/white label operators, etc.);
- how cross-border cases are managed (companies established in one country selling into another) and who bears the EPR responsibility in such situations;

- which products are in scope of the national scheme (product scope);
- whether specific categories require separate reporting or specific rules.

2. Producer registration, contacts and contractual arrangements

This section aims to understand how enrolment takes place and which elements could potentially be harmonised:

- which company information is required for registration;
- when information must be declared (timing: during the year, prior to first placing on the market, at year-end, etc.);
- where registration takes place (online platform, direct contact with the PRO, other channels);
- whether a contract/agreement is required and how producer contacts are managed (single contact point or multiple profiles/roles);
- whether the PRO issues a unique identifier (number/code) to the producer;
- whether information on Placed on the Market (POM) is already required at the registration stage and how many years back this applies.

3. Reporting and POM declaration

This section explores how, when and at what level of detail producers are required to report data:

- reporting frequency (annual, semi-annual, quarterly, monthly, etc.) and whether reporting takes place at fixed times;
- operational modalities (online platform, offline forms via email, other tools);
- existence of deadlines and cut-off dates for submission;
- whether reporting requires details related to sales channels (physical retail, own e-commerce, marketplaces, etc.);
- whether a simplified reporting model is foreseen (and under which conditions) and/or a more detailed model (and under which conditions);
- reporting units: pieces, weight, a combination of pieces and weight, or other methods;
- data granularity: by SKU, by model, by product type, or other aggregations;
- any additional product-related information required: material composition, recycled content, reparability, etc.

4. Invoicing, fees and economic–organisational set-up of the scheme

This section covers questions related to payments, calculation criteria and economic governance:

- when the fee related to the previous year's POM (X-1) is paid and the relevant payment deadlines;

- whether a pre-payment mechanism exists for the current year (X) and how it is calculated (forecast vs previous-year data);
- possibility of instalment payments (if allowed, amounts and conditions);
- methods for issuing/receiving invoices (email, platform-only access, other channels);
- whether eco-modulation of fees is foreseen (and, if so, how it is applied);
- how the activities eligible for financing within textile waste management are defined (collection, reuse, recycling, fibre-to-fibre, others) and the related percentages/targets;
- whether and how the PRO foresees cost compensation mechanisms (and to which operators: collection, sorting, recyclers, others);
- whether a financial guarantee is required to cover obligations (and the related amount, if applicable);
- in cases where multiple PROs operate in the same country: how activities are coordinated/implemented and whether they compete in the same territories.

Analysis of results

The survey covers 11 countries. In total, 12 responses were received from the following Producer Responsibility Organisations (including two from the Netherlands):

Country	Name of the PRO
UK	Reconomy
Denmark	Tekstilretur
France	Refashion
Finland	Not defined yet
Italy	Erion Textiles
Latvia	Zaļā josta SIA
Netherlands 1°	Stichting UPV Textiel / Foundation EPR Textiles
Belgium	Retexbel
Netherlands 2°	ERP Netherlands
Norway	Norsirk AS
Lithuania	Refabrik
Switzerland	Fabric Loop

Below an overview of the **PROs** that responded, including the country, name, current status of the textile consortium set-up, and the type of market characterising each country is reported.

Country:	UK	DK	Finland	Italy	Latvia	Netherlands 1°	Netherlands 2°	Belgium	Norway	Lithuania	France	Switzerland
Name:	Reconomy	Tekstilretur	not defined yet	Erion Textiles	Zaļā josta SIA	Stichting UPV Textiel	ERP Netherlands	Retexbel	Norsirk AS	Refabrik	Refahion	Fabric Loop
PRO active or in development:	In dev	In dev	In dev	Active	Active	Active	Active	In dev	Active	Active	Active	In dev
PRO type:	undefined	undefined	collective	collective	collective	collective	collective	collective	collective	collective	collective	undefined
Market type:		Competitive	Competitive	Competitive	Competitive	Competitive	Competitive	Monopolistic	Competitive	Competitive		Competitive

Following the main results from the main sections of the survey are reported.

1. GENERAL - NATIONAL LAW

Who is considered a “producer” across countries?

Type of Entity	Yes	No	Not defined
Manufacturers	Italy, Latvia, Netherlands (both), Belgium, Norway, France. Planned Yes: Finland, Lithuania		UK – no legislation yet, expected to follow EU approach. Denmark, Switzerland
Resellers	Italy, Latvia, Netherlands (both), Belgium, Norway, France. Planned Yes: Finland, Lithuania		UK – no legislation yet, expected to follow EU approach. Denmark, Switzerland
Importers	Italy, Latvia, Netherlands (both), Belgium, Norway, France. Planned Yes: Finland, Lithuania		UK – no legislation yet, expected to follow EU approach. Denmark, Switzerland

Distance sellers / e-commerce	Italy, Latvia, Netherlands (both), Belgium, Norway, France. Planned Yes: Finland, Lithuania		UK – no legislation yet, expected to follow EU approach. Denmark, Switzerland
Other cases	Erp suggest corporate/workwear; leasing/renting textiles		UK – no legislation yet, expected to follow EU approach. Denmark, Switzerland

Comment: Overall trend: in almost all countries, domestic manufacturers/brands placing textiles or footwear on the market for the first time will be considered “producers” and obliged to register and report to the national EPR scheme.

2. REGISTRATION - CONTACTS - AGREEMENTS/CONTRACTS

The information collected provides a comparative overview of how different national textile EPR systems currently approach four key operational aspects:

- timing of producer registration;
- registration channels and modalities;
- contractual arrangements and management of producer contacts;
- collection of Placed on the Market (POM) information at registration stage.

The countries covered are UK, Finland, Italy, Latvia, the Netherlands (two responses), Norway, Lithuania.

The comparison confirms that there is no fully harmonised approach across countries. Significant differences remain not only in the timing of registration, but also in the channels used, the role of the PRO versus public authorities, the requirement to sign formal agreements, and the extent to which POM data must already be declared at the registration stage.

In general, the results show that:

- some systems allow registration at any time during the year, while others link registration to a deadline before placing products on the market, to annual declaration cycles, or to the moment of joining a PRO;
- registration may occur through online portals, direct contact with the PRO, government systems, or mixed models;
- in most cases, some form of agreement or membership commitment is required, even where the legal or operational model is still under development;
- the request for POM information at registration is still uneven, with major differences in whether data are required at all and, if the case, for which reference period.

Timing of registration

The first area of comparison concerns when producers must register. A first group of countries appears to allow registration during the year, with no single fixed cut-off. This is the case, for example, in Italy, both responses from the Netherlands. However, even within this group, the underlying logic differs; in one Dutch case registration is effectively annual for the whole year; and in Italy the system also includes a timing linked to PRO subscription.

A second group links registration to a requirement before placing products on the market. This is most clearly defined in Italy, where registration is expected 30 days in advance, while Finland, Norway and Lithuania also indicate some form of prior registration, although in Finland and Lithuania the detailed deadline is not yet fully specified. Norway stands out by indicating a recurring monthly timing.

Other countries do not currently provide a clear framework. In the UK, timing is still not defined. In Latvia, there is no requirement to register months in advance. In one Dutch response, no advance timing is considered necessary.

The findings highlight strong divergence in registration timing, ranging from open registration during the year, to advance notification, to annual or quarterly logic. This is one of the clearest areas where harmonisation could reduce uncertainty for producers operating across markets.

Registration channels and modalities

The second area concerns how registration takes place. Digital tools are widely present, but not uniformly developed.

- Italy plans registration through the Erion portal, Norway uses an online portal.
- Lithuania foresees registration through the GPAIS public information system.
- One Dutch response points to a government online notification form.
- Finland also indicates an online route, although detailed information is still missing.

At the same time, some systems are still under development:

- in the UK, the governance structure is not yet decided;
- in one Dutch response, there is not yet a comprehensive textile company registration obligation.

In several countries, direct contact with the PRO remains an important channel, either as the main registration route or as a complementary mechanism:

- Italy, Latvia, one Dutch response, Norway, and Finland indicate direct interaction with the PRO;
- in Italy, the process includes a membership form in PDF generated from data entered by the producer;

Other models

Some systems also include registration or notification directly with public authorities. One Dutch response explicitly notes that put-on-market can be registered directly with the government. This

suggests that, in practice, the role of the PRO versus the role of the state differs significantly from one jurisdiction to another. Although digital registration is becoming the norm, the governance model behind registration remains fragmented. Some systems are PRO-centred, some are authority-centred, and others combine both. This affects not only user experience, but also consistency of data management and compliance monitoring.

Requirement to sign an agreement

Most countries indicate that the producer is, or likely will be, required to sign an agreement or membership form. This is clearly confirmed in Italy, Latvia, both Dutch responses, Norway, Lithuania. Even where the system is not finalised, such as in Finland, the expectation is that an agreement will almost certainly be required. Only the UK remains fully undefined at this stage. This suggests that a contractual relationship with the PRO is generally considered a core feature of collective compliance systems.

Management of producer contacts

The survey also shows different approaches to the management of contact persons and access rights. Some countries foresee multiple contact roles with differentiated access, especially where digital systems are used. This is evident in:

- Finland, where role-specific access is expected;
- Italy, where different persons may receive different information and only the reporting contact may access the portal.

Other systems rely on a single main contact person per company, as indicated in Latvia and one Dutch response.

In some cases, restrictions appear limited or absent:

- one Dutch response indicates no differentiated contact structure;
- Lithuania reports that contacts will not be ranked according to restricted access on a company-by-company basis;
- current Spanish practice is still relatively informal, pending the future programme.

There is no common model for producer contact management. The main divergence lies between systems based on role-based access and differentiated permissions and those based on a single company contact. This has implications for governance, accountability, and data security.

Producer identification and unique IDs

The responses show that many systems provide, or are expected to provide, some form of identifier for producers, but the nature of the identifier varies.

- Italy uses a business partner number valid across multiple Erion consortia.
- Latvia and Norway indicate some form of producer or member identification.
- In one Dutch case, the identifier is a contract number.
- In the other Dutch response, the PRO provides an administrative member number, but not a public national registration number.

- Finland expects a producer number to be assigned by the administrator or enforcement authority.

By contrast, the UK remains undefined and one response from Lithuania is uncertain.

Identifiers are widely used, but there is an important distinction between:

- national/public registration identifiers, and
- internal PRO or administrative membership numbers.

This distinction should be clarified in any future harmonised framework.

POM information required at registration

The last area concerns whether producers are asked to provide Placed on the Market data at the moment of registration, and for which reference period. The picture is mixed. Some countries do require POM-related information already at registration. This seems to be the case in Italy, Latvia, one or both Dutch responses depending on interpretation.

Other systems either do not require such information yet or rely on other sources:

- Norway indicates none;
- Lithuania refers to POM information only from the moment legislation is implemented;
- one response mentions use of customs data and self-registration;
- another indicates that there is currently no requirement.

Reference period requested

The request for POM data at registration is one of the least aligned elements across countries. The differences concern both the existence of the obligation and the reference period to be declared, creating additional complexity for producers entering multiple systems. Where POM is required, the reference period is not harmonised:

- Italy refers to the latest closed year (X-1);
- one Dutch response refers to the actual year;
- another refers to X-1 and the current year;
- Latvia appears to indicate 0, meaning no previous-year lookback;
- in Lithuania and Finland, the final rule is still not fully defined.

Reporting is generally done through online platforms, but frequencies differ significantly between countries, so producers don't follow a single harmonised schedule:

- Annual schemes: In France, Belgium, the Netherlands (ERP), producers submit one report per year, based on the previous year's placed-on-market data, usually between early March and early April or at other fixed dates.
- Quarterly schemes: Italy, Latvia and Lithuania require four reports per year; Italy also asks for an additional declaration at registration.
- Twice-yearly scheme: For Stichting UPV Textiel (Netherlands), producers report twice a year: first a forecast, then the actual data (to be submitted before 1 April).

- Monthly scheme: Norway is the most demanding, with 12 reports per year, i.e. monthly reporting.

3. REPORTING MODELS: DEADLINES SIMPLIFICATION AND DETAILS

The survey results on reporting requirements show that, although some common trends can already be identified, significant differences remain across countries in terms of simplified reporting options, data formats, and reporting granularity. The comparison highlights that some elements are relatively aligned, while others are still subject to divergent national approaches or remain undefined.

In particular, the evidence points to varying practices regarding the possibility of simplified reporting, the use of units such as pieces and/or weight, and the level of detail required in relation to product categories, material composition, repairability, and recycled content. These findings confirm that reporting remains one of the areas where further clarification and harmonisation could help reduce complexity and administrative burden for producers.

Simplified reporting: 5 No 2 Yes (if POM <5000#) 3; Not defined

Reporting details:

- in #pieces? Mostly No (5) 2 possibly Yes
- in weight? Mostly yes (6) 1 no 1 not defined yet
- a combination of the two? 5 Yes 5 no.

Reporting granularity:

- SKU (Stock Keeping Unit,) type-model, type? Mostly (5 no) 1 yes
- Material composition: 4 No 3 yes
- Repairability Mostly no (7)
- Recycled content Mostly No (4), 3 Yes

Responses show limited harmonisation among the PROs, both on the reporting modalities and the level of detail and frequency they would request there is clearly room for further alignment and discussion

Invoicing details

Payment timing: when the invoice for POM of year (X-1) is paid; whether there is a pre-payment for POM in year X and what the deadlines are (first payment, pre-payment).

POM calculation for year X: whether it is based on POM data from year (X-1) or on a forecast.

Payment modalities: whether instalments are allowed and, if so, under which conditions (amounts, due dates). Invoice delivery: whether the invoice is received by email, only visible on the registration platform, or sent/received through any other channels.

Many different approaches, general preference for current-year payments: invoices may be sent by e-mail or via national tax/registration portals, instalments can be allowed, and both deadlines and calculation methods (forecast vs previous-year POM, year X vs X-1, often based on quarterly reports) are still not clearly defined. This provides scope for further harmonisation.

Eco-modulation is currently not considered by any of the respondents, but it will probably be introduced with the national implementation and ESPR.

Approved tasks for textile waste management (%)

Collection: many do not provide any numeric value, one respondent mentions 15%, and the others give only qualitative answers (referring to the WFD, local market volumes, or “as much as needed to achieve reuse and recycling targets”).

- Reuse: many do not provide answer or are absent, only the two from NL mentioned 20% and 50% (based on the x-1 POM)
- Reuse in the country (if any): many do not provide answer or are absent, the two from NL both mentioned 10%
- Recycling: only one answer, not more than 30%, if applied - subtracted from 50% of reuse

From fibre to fabric (if any): Only the two from NL answered a quarter of the reuse, thus 7,5%, if recycling is applied, 25% of any recycled weight.

Other tasks (if any): companies should do an effort to use recycled content in their new products, no % set, push for public awareness

PRO cost compensation & Financial guarantee

Textile waste collectors, mostly yes (3) or waiting for the law (1) (yes, a guaranteed fee for collecting and cleaning-out)

Textile sorters & recycling: mostly yes (4) or waiting for the law

Recyclers: for most PROs, this is clearly the main mechanism foreseen to compensate their costs (7 responded “Yes”).

Does PRO provide a financial guarantee for obligations? Two yes: 30% of annual cost, 100 000 EUR insurance amount.

PRO market (free/monopolistic)

How are tasks implemented when several PROs exist?

In some countries a clearing house or coordination office is planned or foreseen (e.g. CORIT, Spanish draft Royal Decree), in others there are already several competing textile PROs with free choice for producers, elsewhere there is only one PRO, and in a few cases, coordination is still under development or only informally discussed, with no official model decided yet.

Do PROs compete in the same territories?

Overall, the answers are largely positive: most respondents say “yes”, one is still to be defined, and one explains that several PROs coexist with different profiles (a sector-led scheme, an NGO-initiated one for smaller proactive companies, and a commercial scheme targeting large international brands and retailers). In one case it is added that, by law, EPR compliance schemes must offer universal service, even if individual systems may be limited to their own territory.

Main findings

Overall, the evidence confirms a high degree of cross-country variation in the design of registration and onboarding procedures for textile EPR systems.

The main findings can be summarised as follows:

- **Registration timing is not harmonised:** approaches include year-round open registration, advance registration, annual declaration cycles, and registration upon joining a PRO.
- **Registration channels differ across systems:** while online portals are becoming more widespread, many schemes still rely on direct contact with the PRO, paper or PDF forms, or notifications submitted through public authorities.
- **Agreements are generally required:** in most countries, registration is linked to a contractual arrangement or formal membership commitment with the PRO.
- **Contact management models vary:** some systems allow for multiple user roles and differentiated access rights, while others rely on a single company contact.
- **Producer identification follows different approaches:** although identification mechanisms are commonly in place, there is no shared distinction between public registration numbers and internal PRO member IDs.
- **POM requirements at registration remain inconsistent:** some systems require POM data at the outset, while others do not; where such data are requested, the applicable reference periods vary considerably.

Based on the comparison, the areas showing the strongest potential for future harmonisation are:

- a common approach to registration timing, particularly in relation to first placing on the market;
- a minimum shared dataset for registration;
- clearer rules on whether POM data should be submitted at the registration stage, and for which reference year;
- a more consistent system for producer identifiers;
- shared principles for role-based access and contact management;
- broader adoption of interoperable digital registration systems, while preserving flexibility for national governance models.

Key points of interest for harmonisation

Among the aspects identified as particularly relevant for further discussion and for the development of a harmonised model, several concrete issues emerged in relation to producer registration. These include the timing for submitting company information, the channel or platform through which registration should take place, the management of contracts or agreements and producer contacts, and the definition of which POM (Placed on the Market) information should be required already at the registration stage, including the appropriate level of detail.

Another important issue concerns the definition of product scope, which appears to be closely linked to parallel workstreams and therefore requires a coordinated approach to ensure consistency between product scope and related administrative and reporting requirements.

The collected evidence also points to significant harmonisation potential on the reporting side. Although digital platforms are widely used, reporting frequencies and deadlines vary substantially, ranging from annual to monthly submissions. This suggests scope for more aligned rules and more consistent reporting calendars.

Considerable variation was also identified in invoicing practices, including payment timing, calculation bases, instalment arrangements, and operational management. In addition, eco-modulation does not appear to be applied in the cases analysed so far, although it may become an increasingly relevant issue as the regulatory framework develops.

The next steps include completing and validating the collected evidence, discussing how models can be aligned in light of ongoing regulatory developments, and preparing a final output with recommendations, for example in the form of a guidance document. The evidence base could also be further strengthened through additional input from stakeholders who have not yet participated.

Conclusions

The assessment confirms that EPR registration, reporting, and financial management systems across Member States remain highly heterogeneous, despite being rooted in common EU-level obligations.

Differences in national transposition and implementation affect the definition of obligated producers, the scope of products covered, registration requirements, reporting frequencies, data granularity, and invoicing and payment practices. Although the regulatory framework is still evolving, this fragmentation increases complexity for both authorities and producers, particularly those operating cross-border and online, while also reducing data comparability, interoperability, and the overall effectiveness of the systems.

In this context, the comparative analysis points to several priority areas where greater convergence could generate tangible benefits in terms of simplification, transparency, and the functioning of the Single Market.

A first area concerns greater legislative clarity, particularly around the definition of “producer”, the treatment of cross-border cases, and the product categories falling within EPR scope. A second concerns producer registration, where a minimum common dataset, more consistent timing requirements, and shared criteria on the collection of POM information could help reduce administrative burden. Reporting is another key area for harmonisation, given the wide variation in reporting calendars, frequencies, units of measurement, and levels of detail; in this respect, the identification of a common EU core dataset would significantly improve comparability and usability of data.

Further opportunities for alignment concern the introduction of simplified approaches for small producers, in order to ensure proportionality of obligations, as well as greater predictability and standardisation in invoicing, pre-payments, instalments, calculation bases, and deadlines. In countries

where several PROs operate, clear coordination mechanisms are also needed to ensure consistent operating conditions, equal treatment of producers, and uniform service coverage. More broadly, the development of interoperable digital tools based on common standards for data, authentication, and traceability should be considered a necessary precondition for future harmonisation.

Overall, the analysis shows that harmonisation does not require the elimination of all national specificities, but rather the definition of a common core of rules, data, and processes on which coherent and interoperable national systems can be built. Progress in this direction would help reduce administrative burdens, improve data quality and enforcement, and support a more coherent and effective implementation of textile EPR across Member States.

Article V. Policy recommendations

- Enhanced legislative clarity in order to avoid inconsistent interpretations within a single Member State including standardising definitions to reduce divergent interpretation.
- Agree a minimum common EU-aligned dataset for registration, keeping additional national fields strictly necessary and proportionate.
- Harmonise reporting calendars and frequencies where feasible; align core reporting units/categories and avoid excessive granularity.
- Introduce simplified reporting options for small producers while maintaining essential compliance controls.
- Make invoicing/payment rules more predictable (cycles, pre-payments, instalments, deadlines) to reduce administrative burden and disputes.
- Establish coordination mechanisms where multiple PROs operate (e.g., clearing/coordination structures) to ensure consistent rules and universal service.
- Design digital systems for interoperability: common data formats/standards, secure authentication, strong identity assurance, and data portability.
- Future-proof systems to accommodate policy evolution (e.g., eco-modulation, export traceability, enhanced verification) without disruptive redesign.

Annex I

Which products are within the scope of the EPR-scheme in your country?

	UK	Denmark	Finland	Italy	Latvia	The Netherlands	Belgium	The Netherlands	Norway	Lithuania	France	Switzerland	
	Reconomy	Tekstilretur	not defined yet	Erion Textiles	Zaļājosta SIA	Stichting UPV Textiel / Foundation EPR Textiles	Retexbel	ERP Netherlands	Norsirk AS	Refabrik	REFASHION	Fabric Loop	
CN 61	Not defined	Not defined	Yes	Yes	Yes	yes	Yes	yes	Yes	Yes	Yes	planned	
CN 62			Yes	Yes	Yes	yes	Yes	yes	Yes	Yes	Yes	Yes	planned
CN 6301			Yes	Yes	Yes	no	Yes	yes	Yes	Yes	Yes	Yes	planned
CN 6302			Yes	Yes	Yes	yes	Yes	yes	Yes	Yes	Yes	Yes	planned
CN 6303			Yes	Yes	Yes	no	Yes	yes	Yes	Yes	Yes	No	planned
CN 6304			Yes	Yes	Yes	no	Yes	yes	Yes	Yes	Yes	No	not yet defined
CN 6309			Yes	Yes	Yes	no	Yes	no	Yes	Yes	Yes	Yes	planned
CN 6504			Yes	Yes	Yes	no	Yes	no	Yes	Yes	Yes	Yes	not yet defined
CN 6505			Yes	Yes	Yes	no	Yes	no	Yes	Yes	Yes	Yes	not yet defined
CN 4203			Yes	Yes	Yes	no	Yes	no	Yes	Yes	Yes	No	planned
CN 6401			Yes	Yes	Yes	no	Yes	no	Yes	Yes	Yes	Yes	planned
CN 6402			Yes	Yes	Yes	no	Yes	no	Yes	Yes	Yes	Yes	planned
CN 6403			Yes	Yes	Yes	no	Yes	no	Yes	Yes	Yes	Yes	planned
CN 6404			Yes	Yes	Yes	no	Yes	no	Yes	Yes	Yes	Yes	planned
CN 6405			Yes	Yes	Yes	no	Yes	no	Yes	Yes	Yes	Yes / Excluding professional and specialized footwear	planned
Other categories that require separate reporting?					The draft legal act is in preparation, no final information available.		No	no	Not defined	no		Consideration is being given to the inclusion of haberdashery in the ERP scheme	No

Different interpretations in the same country (ND) Discrepancies in interpretation of covered products in the Netherlands show the importance of clearly defined products in scope that is in line with the Waste framework directive and other applicable legislation, and is harmonised across the EU Member States.

About Textile PRO Forum

The Textile PRO Forum is a collaborative platform that brings together textile Producer Responsibility Organisations (PROs) and stakeholders across Europe to exchange knowledge, align approaches, and support the implementation of textile Extended Producer Responsibility (EPR) schemes. The Forum promotes best practices, operational efficiency, and dialogue on key challenges such as collection, sorting, reuse, recycling, and reporting. Its goal is to contribute to a harmonised and effective textile EPR system that supports the transition to a circular textile economy. Currently, it gathers 35 organizations representing 21 countries.