



A FEBELSAFE POSITION PAPER ON:

Professional Textiles in an Extended Producer Responsibility Framework

Date: September - 2025

Textile EPR in Belgium — Focus on PPE & Co — Belgian reality with a European horizon

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Executive Summary

The current policy debate on Extended Producer Responsibility (EPR) for textiles is largely driven by a consumer-oriented logic, focused on fashion, fast fashion and household textiles. However, the professional textile sector operates in a fundamentally different technical, economic and regulatory context.

For the purpose of this position paper, **professional textiles** refer exclusively to **textile-based products used in professional environments**, including:

- textile-based Personal Protective Equipment (PPE), such as protective clothing,
- corporate clothing and professional workwear (non-PPE),
- professional flat linen for healthcare, hospitals, hospitality and industry.

It is essential to underline that:

- not all PPE are textiles (e.g. helmets, safety footwear, eye and face protection, respiratory protection and hearing protection),
- not all professional textiles are PPE,
- and not all textiles are professional textiles.

Non-textile PPE fall outside the scope of textile EPR systems and are therefore not covered by this position paper.

Professional textiles are used in regulated professional environments and are managed through professional procurement, maintenance and end-of-life systems.

Textile-based PPE protect the wearer against occupational hazards and are subject to strict European legislation, harmonised standards and certification procedures.

Other professional textiles — such as corporate clothing, cleanroom garments and professional linen — do not protect the wearer, but fulfil essential operational, hygienic or organisational functions within controlled professional environments.

For decades, the professional textile sector has already applied circular principles through long service life, leasing models, professional laundering, repair and controlled reuse. This makes the sector a frontrunner in circular economy — but with a logic that differs fundamentally from consumer textiles.

A uniform EPR framework designed for fashion and household textiles is therefore neither technically workable nor socially responsible for textile-based PPE and professionally managed textile products.

This paper calls for a proportional, safety-driven and technically sound EPR framework that:

- recognises unavoidable exceptions,
- protects SME competitiveness,
- ensures a level playing field,
- and aligns with the forthcoming European EPR harmonisation.

1. Introduction — Professional textiles are not consumer textiles

This document provides the detailed policy rationale underpinning our recommendations on Extended Producer Responsibility (EPR) for textiles.

Current policy discussions on textile EPR are largely shaped by a consumer-oriented perspective, focusing primarily on fashion, fast fashion and household textiles. While this approach may be appropriate for consumer markets, it does not reflect the reality of the professional textile sector.

Scope and definitions

For the purpose of this position paper, the term **professional textiles** refers exclusively to **textile-based products used in professional environments**, including:

- textile-based Personal Protective Equipment (PPE), such as protective clothing and protective gloves,
- corporate clothing and professional workwear (non-PPE),
- professional flat linen for healthcare, hospitals, hospitality and industry.

It is essential to underline that:

- **not all PPE are textiles** (e.g. helmets, safety footwear, eye and face protection, respiratory protection and hearing protection),
- **not all professional textiles are PPE** (e.g. corporate clothing and professional linen),
- and **not all textiles are professional textiles**.

Non-textile PPE fall outside the scope of textile EPR systems and are therefore **not covered by this position paper**. They are regulated under separate product, safety and waste frameworks.

This paper therefore focuses exclusively on **textile-based PPE and professional textile products** that may fall within the scope of future textile EPR legislation.

Professional textiles may look like consumer textiles — but they are managed in a fundamentally different system.

The professional textile sector comprises textile-based PPE, hygiene and contamination-control textiles, corporate workwear and representative clothing. These products are procured, owned and managed through professional supply chains and contractual service models.

They are not consumer lifestyle goods. They are part of institutional operations, subject to professional performance requirements, maintenance regimes, hygiene protocols and end-of-life management systems.

Textile-based PPE protect the wearer and are subject to strict European legislation, harmonised standards and certification procedures, including CE marking and EN/ISO standards.

Other professional textiles — such as cleanroom garments, professional linen, corporate workwear and representative clothing — do not protect the wearer, but fulfil essential operational, hygienic or organisational functions within regulated professional environments.

Historical context

From the very first discussions on collective producer responsibility schemes, the professional textile sector — with Febelsafe and FBT as partners — has been actively involved in the development of structured management systems. The former Circletex project already provided a framework in which not only fashion and household textiles, but also professional textiles, were structurally integrated.

Over time, however, the policy focus has shifted predominantly towards consumer textiles. Today, representation in EPR discussions is largely driven by the fashion and retail segment and by raw material and fabric industries serving the apparel market.

As a result, the specific needs and operational realities of professional textiles — textile-based PPE, corporate clothing and professional flat linen — have gradually been pushed into the background.

It is now essential to restore this balance and to reintegrate professional textiles as a fully-fledged policy category.

Core policy position

Our starting point is therefore clear:

Textile-based PPE and professional textiles must not be subjected to the same EPR logic as fashion and household textiles.

There is a need for a dedicated policy framework that takes into account:

- safety requirements,
- hygiene obligations,
- regulatory compliance,
- and the specific circular economy realities of professional textiles.

Only by recognising these structural differences can EPR policy contribute to a truly sustainable, safe and economically viable circular transition.

2. European policy context

The Belgian debate on textile EPR cannot be disconnected from the broader European policy framework.

The EU Strategy for Sustainable and Circular Textiles (2022) sets the ambition that, by 2030, all textile products placed on the European market should be durable, repairable and recyclable. Professional textiles have already applied these principles for decades through long service life, leasing and professional maintenance.

The Ecodesign for Sustainable Products Regulation (ESPR) introduces ecodesign requirements for products falling under the General Product Safety Regulation (GPSR). However, textile-based PPE are regulated under the Personal Protective Equipment Regulation (EU) 2016/425 and, where applicable, the Medical Device Regulation (EU) 2017/745.

For these safety-critical categories, protection of life and health remains the primary legal objective. Circular ambitions must be translated proportionally.

The Digital Product Passport can support traceability, but for textile-based PPE and professional textiles it must reflect operational reality: maintenance, service life, contamination risks and end-of-life restrictions.

The European Commission is preparing a harmonised EPR framework across all Member States. A standalone Belgian scheme risks fragmentation, gold-plating and competitive distortion. Any national approach must therefore remain aligned with the future European system.

Belgian regulatory context

In Belgium, the competent authorities have currently excluded PPE from the national textile EPR scope, recognising the specific regulatory, safety and operational framework that governs PPE products.

This exclusion reflects the fundamentally different nature of PPE compared to consumer textiles and confirms the need for a distinct policy logic.

However, at European level, the future scope of textile EPR legislation remains under discussion. Any potential inclusion of textile-based PPE must therefore be subject to strict safety-first principles, proportionality and a dedicated regulatory approach.

3. Safety first — a non-negotiable principle

Textile-based PPE are not ordinary products. Their primary function is to protect workers and users against life-threatening risks.

They are subject to strict European legislation, harmonised standards and conformity assessment procedures.

Other professional textiles are used in regulated and safety- or hygiene-critical environments, where reliability, traceability and controlled end-of-life management are essential.

Circular economy objectives are essential, but must never compromise protective performance. A helmet liner or protective garment that loses impact resistance or flame retardancy due to recycled materials is not circular progress — it is a safety risk.

Any EPR framework must therefore explicitly enshrine safety as the first and overriding assessment criterion.

Without safety, there is no professional textile.

4. Recognition of necessary exceptions

Not all textile-based PPE and professional textiles can be integrated into circular systems.

Examples include:

- contaminated firefighter garments, laboratory coats or chemically exposed clothing,
- single-use medical PPE where sterility is essential,
- technically non-recyclable composites and multilayer protection systems.

In such cases, reuse or recycling is excluded for safety reasons. Secure treatment or disposal must remain legally available.

EPR legislation must therefore explicitly recognise unavoidable safety-based exceptions.

5. Strengthening circular strategies that actually work

Professional textiles have been circular for decades through long service life, leasing, maintenance, repair and controlled reuse.

Circular policy must therefore focus on:

- Reduce & Rethink through service models,
- Reuse & Repair via certified laundries and repair workshops,
- Refurbish & Remanufacture with re-certification,
- Recycle only where technically and safely feasible,
- Recover contaminated streams securely.

Public policy should reinforce existing circular systems rather than replace them with parallel structures.

6. Governance and a level playing field

An effective EPR framework requires:

- traceability aligned with operational reality,
- enforcement of CE conformity and EPR obligations,
- equal treatment of EU and non-EU producers,
- closing loopholes in online platform sales.

Without strong market surveillance and governance, EPR systems will suffer from free-riding, unfair competition and greenwashing.

7. Economic reality of SMEs

The Belgian professional textile sector is dominated by SMEs.

EPR systems must therefore respect proportionality, avoid excessive administrative burdens and ensure that public procurement criteria reflect life-cycle value rather than lowest price only.

Without flanking measures, EPR risks weakening the very companies that already invest in durability, safety and circularity.

8. Critical reflection on current policy thinking

Current PEF/LCA methodologies oversimplify professional reality and disadvantage long-life protective products.

Consumer logics of reduced consumption do not apply to safety equipment.

Parallel collection systems risk contamination and loss of traceability.

Existing leasing, laundry and repair systems already deliver proven circular results and must be recognised.

Professional textiles are already circular and socially embedded. Policy must build on this reality.

9. Core message and policy challenge

Textile-based PPE have combined safety and circularity for decades, supported by professionally managed textile systems.

Public policy must strengthen this leadership.

This requires:

- a dedicated (temporary) Belgian framework for professional textiles,
- explicit recognition of safety-based exceptions,
- a level playing field with fair enforcement,
- proportionality for SMEs,
- and alignment with the future European EPR framework.

Textile-based PPE are safety equipment.

Other professional textiles are not fashion products, but professionally managed operational and hygiene textiles.

Safety first. Circularity second. Always together — in Belgium and in Europe.

Find the position paper also on our website www.febelsafe.be

About Febelsafe

Febelsafe is the Belgian federation representing manufacturers, distributors, service providers and professional end users active in personal protective equipment (PPE), workwear & professional textiles.

Its members cover the full professional value chain, including product development, certification, distribution, leasing, laundering, maintenance and end-of-life management.

Febelsafe promotes product safety, regulatory compliance, quality and sustainable innovation in PPE and workwear applications. The federation actively contributes to European and national policy development in the areas of product safety, chemical regulation, market surveillance, ecodesign and circular economy.

Through expert working groups, standards engagement and dialogue with public authorities, Febelsafe supports the development of technically sound, legally robust and practically workable regulation for the sector.

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