UNBOXING
Sustainable Fashion

How European regulations affect the fashion sector

MODACC CLÚSTER CATALÀ DE LA MODA

CRAFT IT 4 SD

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Table of contents

Introduction

The fashion sector is in a moment of unprecedented transformation. Several studies warn about its high environmental impact: millions of tons of textile waste are generated every year and the production of a single garment can require thousands of liters of water (Earth.org, 2024; USC Dornsife, 2023). In addition, a large part of the garments purchased are used only a few times before being discarded (Zipdo, 2024) and the textile industry is responsible for a significant fraction of global CO_2 emissions and industrial water consumption (UNEP, 2023).

Although these data invite reflection, many companies still do not know where to start. And it is understandable: it is difficult to set a goal when there is no clear map to achieve it.

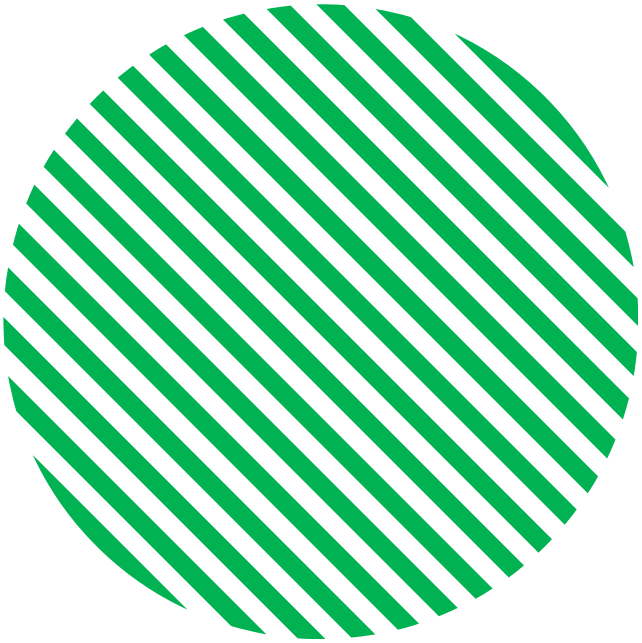
The European regulatory landscape is also advancing rapidly and ambitiously. The new regulations seek to promote a profound transformation of the sector, but they also represent a considerable challenge for SMEs, which constitute the heart of Catalan fashion.

At the Cluster, we recognize our responsibility to accompany companies in their adaptation, providing them with knowledge, tools and alliances that allow them not only to adapt, but also to lead this process.

This document was created with this purpose: to disseminate useful and accessible knowledge so that more and more companies integrate the double transition, green and digital, and place the environmental and social impact at the center of their business decisions.

We have selected three key regulations that will set the course of the industry in the coming years: Ecodesign, Decarbonization and Green Claims.

We hope that this guide serves as a starting point or consolidation for companies that seek to strengthen their resilience and move towards a fashion that, without losing its essence, continues to stand out for what characterizes it: creativity.



Why impact measurement?

Impact measurement has become the cornerstone of global action. Never before has humanity had so much data. However, this does not necessarily mean that we are moving towards fully data-driven decision-making. The real challenge is that we measure more than we can analyze and understand. Measuring is crucial, but analyzing is even more important.

For an industry whose negative impacts were, until relatively recently, unknown to most, identifying, quantifying, minimizing and transparently communicating these impacts has become a fundamental pillar of its operations. Instead of continuing with a linear vision, we must transition to an industry that integrates science and data into decision-making.

This involves adopting measurement tools and methodologies that allow for deeper knowledge of the life cycle of products and business operations, as well as the creation of strategies aligned with the company's long-term goals and objectives.

To ensure the maximization of positive impact and efficient monitoring of results, we need to transform data into actions that guide not only the reduction of negative impacts, but also the creation of value in each link in the chain, working towards a more sustainable future.

Fact Sheets

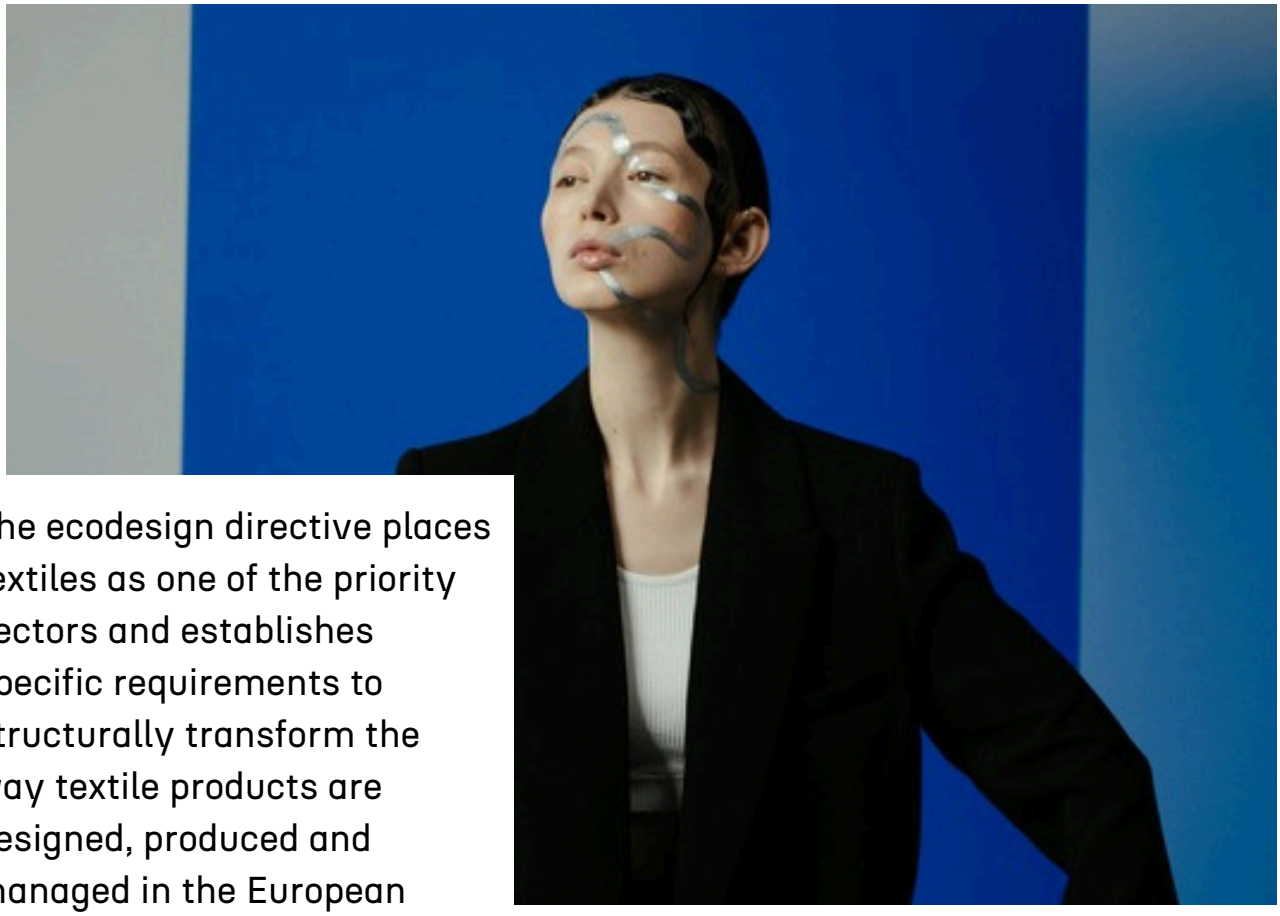
The need to reduce complexity and translate regulatory requirements into concrete and achievable actions is the driving force behind the creation of these factsheets. We have designed these materials as practical and strategic tools to support companies in their adaptation process.

Their purpose is not only to inform, but to activate: to offer a clear, structured step-by-step guide that allows each organization to move forward at its own pace towards the effective integration of sustainable practices.

These factsheets do not seek to impose a single path. On the contrary, they seek to open up possibilities and simplify decision-making, while strengthening the autonomy and resilience of companies. By using them, organizations will gain greater clarity about legislative requirements and their effective integration, thus boosting their ability to innovate, improve their competitive position and actively contribute to building a more sustainable fashion sector.

Ecodesign

Ecodesign Regulation for Sustainable Products (ESPR)



The ecodesign directive places textiles as one of the priority sectors and establishes specific requirements to structurally transform the way textile products are designed, produced and managed in the European Union, in order to accelerate the transition of the textile sector towards a more circular, traceable and transparent production and consumption model, reducing the environmental impact and promoting responsibility throughout the entire life cycle of products.

Objectives

- Incorporate eco-design criteria that guarantee the durability, repairability and recyclability of textile products from their conception.

- Promote the use of sustainable and recyclable materials, reducing the dependence on mixed fibers that are difficult to recover and minimizing textile waste.

- Establish the Digital Product Passport as a traceability and transparency tool, providing information on composition, origin, repair and end of life.

- Prohibit the destruction of unsold textile products and encourage their reuse, donation or revalorization.

- Guarantee clear and accessible information on the environmental and social impact of products for both the consumer and the different actors in the value chain.

- Promote the competitiveness of SMEs that adopt these changes early, generating strategic advantages and positioning in more demanding markets.

Regulations that accompany ecodesign regulations

Digital Product Passport (DPP)

The Digital Product Passport (DPP) is one of the central tools of the ESPR. It functions as a "digital identity" that accompanies each product, component or material, collecting key information on its composition, origin, repair instructions, recyclability and traceability throughout its entire life cycle.

This measure aims to improve transparency and trust in the market, facilitate decision-making by consumers and companies, and promote circularity. For textile companies, the DPP will be a strategic tool to demonstrate regulatory compliance and added value in sustainability.

Destruction of unsold products

The ESPR establishes a ban on destroying unsold textile and footwear products, a practice that has so far contributed significantly to the waste of resources and the generation of unnecessary waste.

Companies will have to implement revalorization strategies, such as reuse, donation, repair or recycling, as well as transparently report on the quantity and destination of surpluses. This measure aims to promote a structural change towards a more efficient and responsible model in the management of stocks and end-of-life of products.

Green Public Procurement (GPP)

Green Public Procurement (GPP) is another key lever of the ESPR. This tool allows public administrations to prioritize sustainable and circular products in their purchasing processes, thus creating a structural demand for products that meet the highest environmental standards.

For the textile sector, this can mean new market opportunities for companies that integrate ecodesign and sustainability criteria into their products, and that can demonstrate their compliance through the DPP and other verification mechanisms.

Timeline

Entry into force of the ESPR (Regulation (EU) 2024/1781)

18/07/24

General framework applicable to all products covered by the ESPR; legal basis for future delegated acts by product group (including textiles).

Adoption of the first ESPR & Energy Labelling Working Plan 2025–2030 (prioritises product groups; textiles included as a work area)

16/04/2025

EU institutions and manufacturers/importers of prioritised products: the process to develop product-specific delegated acts is initiated (application dates for textiles: yet to be defined).

The Commission must adopt the first implementing act on the format and details for publishing information related to unsold products (Article 24(3)).

BEFORE 19/07/2025

Economic operators subject to the disclosure obligation; micro and small enterprises are exempt; for medium-sized enterprises, the disclosure obligation starts on 19 July 2030.

Prohibition on the destruction of unsold consumer products listed in Annex VII (including textiles and footwear).

19/07/2026

Large enterprises and other economic operators (excluding micro and small enterprises); for medium-sized enterprises, the prohibition applies from 19 July 2030.

The Commission must establish the digital registry for the Digital Product Passport (DPP) (Article 13(1)).

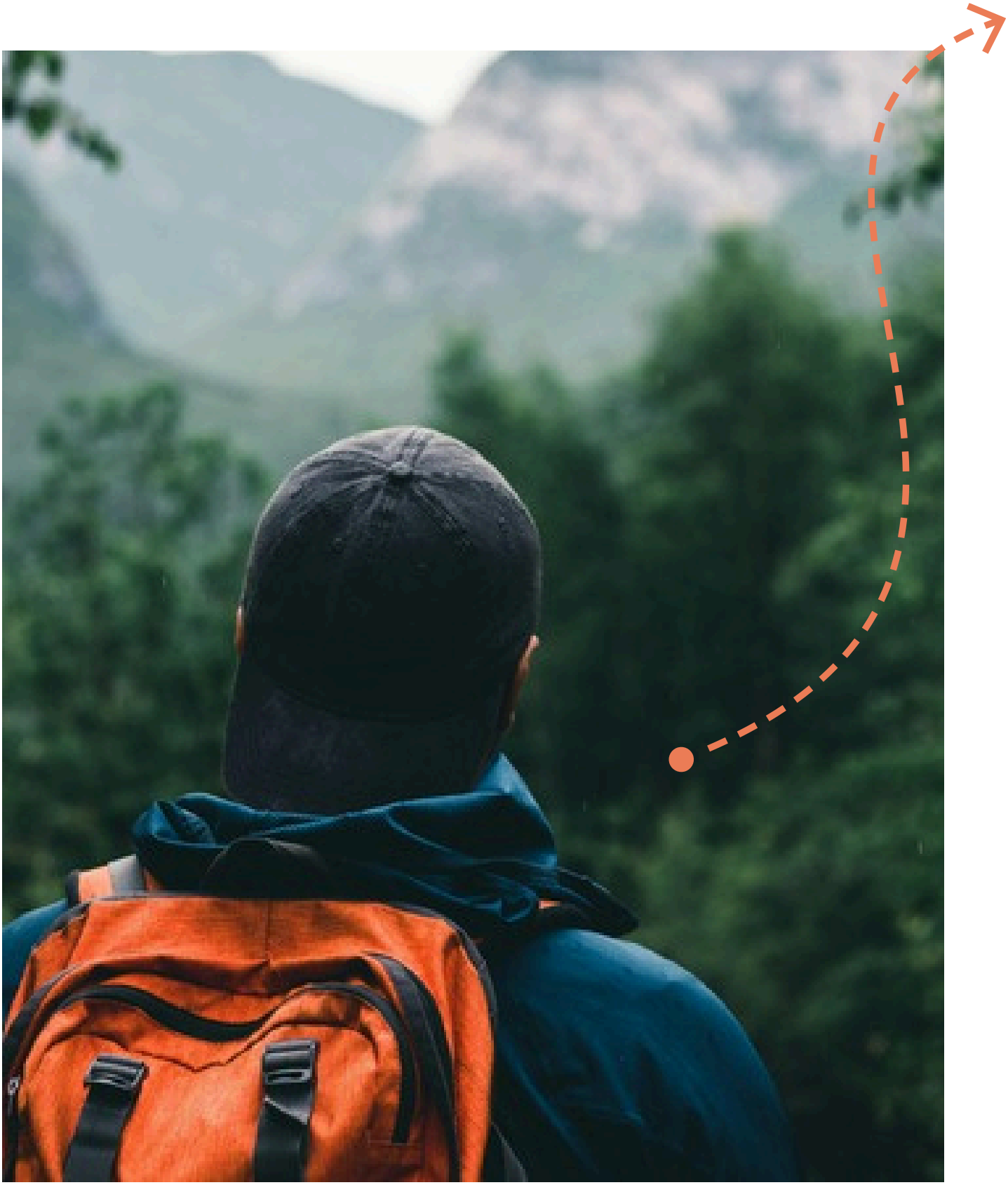
19/07/2026

Applies to product groups for which delegated acts introducing a Digital Product Passport (DPP) are adopted. For textiles, the operational date will depend on the specific delegated act (still pending).

Step by Step

Pas	Descripció	Objectiu	Accions	Resultat esperat
1. Initial knowledge and capability assessment	Assess the level of knowledge and preparedness of the design team and other involved departments.	Identify strengths, gaps, and training needs to ensure a cross-functional implementation of eco-design.	Conduct internal interviews, review current processes, and develop a competency map.	Diagnostic report outlining training needs and providing the basis for an internal capacity-building plan.
2. Strategic planning	Define the roadmap for integrating eco-design within the company.	Establish clear objectives, timelines, and responsibilities across teams.	Set priorities by product line, allocate resources, and develop an implementation schedule.	Internal action plan aligned with regulatory requirements and available resources.
3. Supply chain adaptation	Align suppliers and manufacturing processes with new sustainability and traceability requirements.	Ensure materials and partners meet environmental and social criteria.	Select recyclable or recycled materials, establish traceability requirements, and review supplier contracts.	Supply chain aligned with new EU criteria and improved control over material flows.
4. Product redesign	Integrate durability, reparability, and recyclability criteria across all design stages.	Reduce environmental impact and promote circularity.	Simplify material compositions, prioritise recycled materials, and introduce modular design.	Products optimised for increased durability and resource efficiency.
5. Identification and implementation of technologies	Introduce digital technologies that support the integration of eco-design into product development.	Improve efficiency, reduce physical resource use, and foster sustainable innovation.	Adopt 3D virtual prototyping tools, fabric simulation, 3D printing, and collaborative digital platforms.	More efficient processes, with reduced physical sampling and improved cross-team coordination.
6. Management of surplus and end-of-life	Prevent the destruction of unsold products and promote their valorisation.	Ensure regulatory compliance and drive circular business models.	Explore reuse, resale, or recycling channels, and collaborate with specialised operators.	Significant reduction of waste and recovery of surplus as circular resources.
7. Preparation for the Digital Product Passport (DPP)	Anticipate the future digital traceability obligation under the ESPR.	Prepare systems and teams to manage the data required by the DPP.	Identify key data (origin, materials, durability, reparability), define internal processes, and pilot compatible digital solutions.	Company ready to integrate the DPP through standardised data registration and management systems.
8. Monitoring and continuous improvement	Evaluate and update actions based on results and regulatory developments.	Embed eco-design as a structural business practice.	Define KPIs, conduct internal audits, and establish periodic review forums.	Continuous improvement process aligned with sustainability and innovation objectives.

This suggested route is not intended to be linear or closed: each company can adapt it according to its maturity, resources and ambition. The most important thing is to ensure that sustainability is integrated across the board and that actions are progressive, measurable and coherent with the new European regulation.



Decarbonization

European Climate Law

The European Climate Law consolidates the European Union's commitment to achieve climate neutrality by 2050 and to reduce net emissions by at least 55% (compared to 2019 levels) by 2030. For the textile sector, this regulation implies the progressive alignment of the entire value chain with decarbonization objectives, promoting the use of renewable energies, energy efficiency and the reduction of the carbon footprint in production and logistics processes. It also promotes transparency in the communication of business climate objectives and requires transition plans that integrate measurable and verifiable actions to contribute to the collective EU objectives.

Objectives

- Set a binding target for net reduction of GHG emissions* at EU level by 2030.
- Establish that all emissions and removals regulated by EU legislation are balanced, at the latest, by 2050.
- Promote mechanisms for monitoring, evaluating and periodically reviewing climate change programmes and policies.
- Ensure that all sectors —including textiles— contribute to the transition process towards a greener, more efficient and competitive economy.

*GEH: gasos d'efecte hivernacle.

Regulations that accompany decarbonization

Eco-design for sustainable products (ESPR)

The Ecodesign Regulation has a direct impact on emissions because it requires products to be redesigned from the start: more durable, recyclable and resource-efficient.

Applying ecodesign strategies reduces emissions at all stages of the life cycle, from material selection to end-of-life.

In addition, the Digital Product Passport (DPP) will collect environmental data, including the product's carbon footprint, facilitating climate monitoring and traceability.

Corporate Sustainability Reporting Directive (CSRD)

Requires companies to transparently report their emissions and reduction strategies, under the ESRS (European Sustainability Reporting Standards).

This includes the carbon footprint (Scopes 1, 2 and 3) and other climate indicators.

Textile companies will need to have verifiable data on their emissions and those of their suppliers, connecting CSRD with decarbonization and ecodesign actions.

Carbon Border Adjustment Mechanism (CBAM)

The Carbon Border Adjustment Mechanism establishes an additional cost for imports of products with a high carbon footprint from outside the EU.

Although it initially affects sectors such as steel or cement, it is expected to be extended to new materials and products in the medium term, including fabrics and textile components.

For the fashion sector, this means being proactive with traceability and emission reduction tests to maintain international competitiveness.

Timeline

2021

Approval of Regulation (EU) 2021/1119 – European Climate Law, which enshrines the objective of climate neutrality by 2050 and a 55% emissions reduction by 2030.

General framework applicable to all European companies; basis for future requirements affecting industrial and service SMEs.

2021 (Spain)

Approval of Law 7/2021 on climate change and energy transition, which transposes EU objectives at national level and establishes implementation mechanisms.

SMEs with industrial, logistics, design, and garment manufacturing activities within Spanish territory.

2023

Launch of the European Commission's Climate Monitoring Mechanism to track progress by Member States.

Public administrations and productive sectors with emission impacts (fashion, textiles, apparel).

2024 - 2025

Update of the National Integrated Energy and Climate Plans (NECPs) to include specific measures for industry and SMEs.

SMEs seeking access to support schemes or programmes for energy transition and emissions reduction.

2030

First binding milestone: 55% reduction in net emissions in the EU and Spain compared to 1990 levels.

Companies required to measure and report their carbon footprint, especially those with European clients subject to CSRD obligations.

2050

Final objective of climate neutrality: all residual emissions must be offset by carbon removals or net-zero technologies.

All companies in the fashion sector must demonstrate climate neutrality in order to operate within the European market.

Step by Step

Step	Description	Objective	Key Actions	Expected Outcome
1. Carbon footprint diagnosis	Identify and quantify direct and indirect GHG emissions arising from operations, materials, and transport.	Understand the actual impact and establish a baseline.	Conduct a GHG inventory (according to the selected protocol and scope).	Verified baseline carbon footprint report.
2. Define reduction targets	Establish progressive emissions reduction targets aligned with EU objectives and climate science.	Embed decarbonisation into the business strategy.	Adopt applicable targets based on recognised methodologies (e.g. SBTi).	Approved decarbonisation plan.
3. Optimise production processes	Reduce emissions through energy efficiency, machinery upgrades, and logistics optimisation.	Minimise energy and resource use (Scopes 1 and 2).	Replace fossil energy sources with renewables; optimise energy consumption.	Reduction of direct emissions.
4. Decarbonise materials and suppliers	Integrate sustainability criteria into fibre and supplier selection.	Reduce indirect emissions (Scope 3).	Prioritise low-impact materials and support suppliers in developing and/or implementing active climate action plans.	Decarbonised supply chain.
5. Training and team engagement	Build capacity across production, logistics, and management teams to understand the importance of decarbonisation.	Ensure cross-functional ownership of actions.	Internal workshops; definition of roles and shared objectives.	Engaged teams with climate-related competencies.
6. Monitoring and continuous improvement	Periodically assess results and update strategies.	Ensure consistency and progressive ambition.	Annual KPI review and external verification.	Continuous improvement and cumulative emissions reduction.

Green Claims

Substantiation of claims

The EU initiative on green claims seeks to ensure that any environmental claim made by a company about a product or service is verifiable, accurate and comparable, to combat greenwashing. For textiles (a sector already prioritized by the ESPR), this involves basing claims on materials, durability, recycling or carbon footprint with traceable data and recognized methods, and —where appropriate— prior verification by accredited third parties.

Objectives

- Avoid greenwashing and protect consumers.
- Establish common criteria for the measurement, verification and communication of voluntary environmental claims.
- Improve comparability and market trust, creating a level playing field for SMEs that do things right.
- Link with the textile framework (ESPR) and other standards, so that what is communicated is aligned with product/corporate data (LCA/PEF, GHG inventories, traceability)

Regulations that accompany Green Claims

Consumer Empowerment Directive

Amends the directives on unfair commercial practices and consumer rights to prohibit generic claims such as “eco”, “environmentally friendly” or “sustainable” if they cannot be proven with objective data. It also establishes transparency obligations on the durability and reparability of products, with a special focus on textiles.

ESPR and Digital Product Passport (DPP)

Consistency with the ESPR is essential, as the information in the DPP will serve as a basis for verifying and demonstrating environmental claims. This will facilitate traceability, avoiding inconsistencies between commercial declarations and technical data of products.

EU Green Taxonomy and CSRD (Corporate Sustainability Reporting Directive)

These instruments provide the framework for consistency between the communication of claims at product level and environmental and social information at corporate level. Companies will have to align their claims with the indicators and methods included in their sustainability report.

Timeline

Publication of the Proposal for a Directive on Explicit Environmental Claims (Green Claims Directive) by the European Commission

22/03/2023

Does not yet directly affect companies; start of the legislative and consultation process.

Negotiation in the European Parliament and the Council (ongoing trilogues, no final adoption yet)

2024 - 2025

Companies already communicating green claims (especially medium-sized and large companies in the textile sector) should begin preparing internal verification systems.

Publication in the Official Journal of the EU and entry into force 20 days later

2025–2026 (estimated)

All companies making environmental claims about products or services sold in the EU; start of the national transposition period.

National transposition by Member States

2027 (estimated)

Medium-sized and large companies established in the EU or operating in the European market; micro-enterprises possibly exempt or subject to simplified obligations.

Full application of prior verification obligations and alignment with other frameworks such as ESPR and DPP

2028 and ahead

Manufacturers, brands, and distributors of textile products and other priority sectors that communicate environmental impacts or circularity claims.

Step by Step

Description	Objective	Actions	Expected Outcome
1. Inventory of claims (product, packaging, website, social media, retail)	Identify risks and duplication; align terminology	Compile a list of claims; remove generic claims (“eco”, “green”) without substantiation	Claims inventory sheet
2. Internal green claims policy and role	Ensure pre-publication control	Define approval procedures; apply checklists	Política interna vigent i responsabilitats clares
3. Substantiation using recognised methods	Support each claim with verifiable evidence	Select methodology (LCA/PEF, durability, GHG); collect supplier data	Evidence dossier per claim
4. External verification (when required or for credibility)	Reduce legal risk and increase trust	Engage an accredited body; prepare documentation; ensure traceability	Verification certificate/report and documented audit trail
5. Team training (marketing, design, procurement)	Consistent application across the organisation	Best-practice training sessions; real case studies	Reduced communication errors
6. Monitoring and updates	Continuous improvement and compliance	Define KPIs; conduct periodic reviews	Annual report
7. Transparency with consumers	Educate and enable fair comparison	Explain methodology, limitations, and scope; provide links to evidence	Increased credibility and reduced complaints


“Sustainability is not a trend.
It’s the only way forward.”
- Stella McCartney

Toolbox

To move towards a more sustainable and circular production model, companies in the textile sector have a wide range of tools and methodologies that allow them to measure, analyze and improve the environmental and social performance of their products. These methodologies help identify strengths and weaknesses, guide design decisions and transparently communicate the real impact of their collections.

Qualitative	Semi-quantitative	Quantitative
Based on criteria and best practices that allow for an initial assessment without complex calculations. They help identify strengths and weaknesses of a product or collection and initiate improvement processes.	Combine qualitative criteria with measurable indicators. They allow products or processes to be compared and eco-design actions to be prioritised without requiring exhaustive calculations.	Measure and compare environmental and social impacts accurately throughout the product life cycle. They require more demanding data collection but provide verifiable and internationally recognised results.

Eco-design tools

Qualitative

- **Checklists:** verification lists used to review aspects related to materials, packaging, use, and end-of-life.

- **Eco-design tools:** practical guidelines providing strategies applicable to the design and production phases.

- **Eco-labels (EU Ecolabel):** set minimum environmental criteria aligned with European regulation.

Semi - quantitative

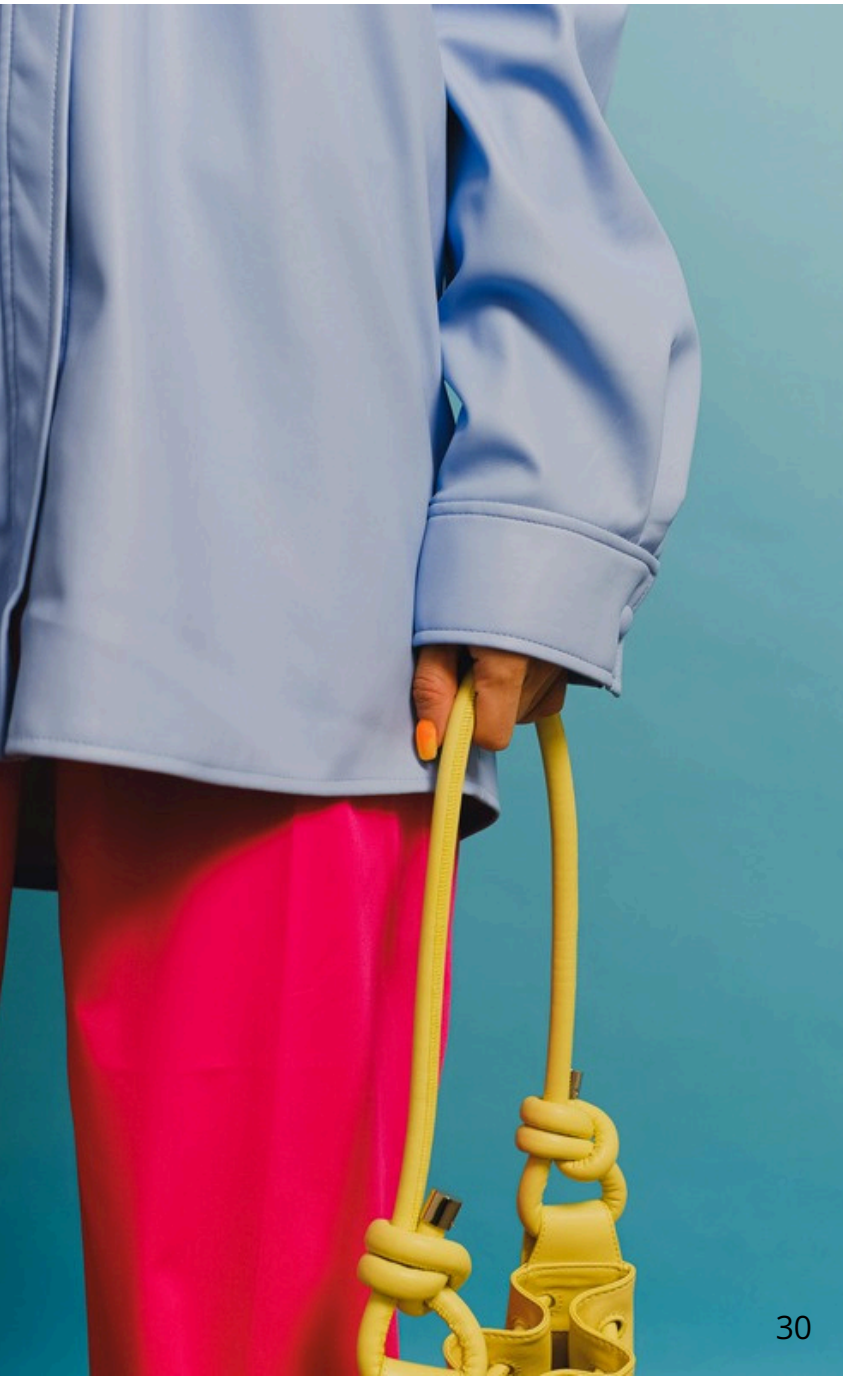
- **Higg Index:** eina que avalua l'impacte ambiental i social de productes tèxtils a partir d'indicadors com aigua, energia i residus.

- **LiDS Wheel:** metodologia que mesura el nivell d'ecodisseny segons vuit estratègies clau i ajuda a identificar oportunitats de millora.

- **Circular Transition Indicators (CTI):** eina que quantifica el grau de circularitat d'un producte o empresa segons fluxos de materials i reutilització.

Quantitatives

- **LCA (Life Cycle Assessment):** quantifies environmental impacts from raw material extraction through to end of life.
- **PEF (Product Environmental Footprint):** a harmonised EU methodology that enables the comparison of environmental impacts among products within the same sector.
- **ISO 14040 and ISO 14044:** standards that define the principles and technical requirements for conducting full Life Cycle Assessment studies.



Eco-design Guidelines

1. Select the appropriate methodology

Choose the evaluation methodology that best fits the company's current stage and the required level of accuracy.
Starting with qualitative methodologies can help establish an initial diagnosis, while semi-quantitative and quantitative approaches allow progress toward more precise and verifiable measurement of impacts.

Key questions:

- What information do we want to obtain from this analysis?
- Do we need an initial diagnosis or a detailed comparison between products?
- Do we have sufficient data to apply quantitative methodologies?

2. Select the tool according to objectives and resources

Choose the most suitable tool based on the company's size, available resources, and environmental and strategic objectives.
An overly complex tool may hinder implementation, while an overly simple one may fail to provide relevant information.

Key questions:

- What specific objectives do we want to achieve with this tool?
- Who will use this tool (internal staff or external partners)?
- Do we have the time and technical resources required to sustain its use over the long term?

3. Train the Internal Team

No tool delivers value without people who understand how to use it properly. Training ensures the methodology is applied rigorously, results are interpreted correctly, and cross-functional collaboration is embedded across departments.

Key questions:

- What is the team's current level of knowledge regarding the tool?
- What type of training or external support do we require?
- How will we ensure that learnings are effectively implemented in day-to-day operations?

4. Run a Pilot Test

Apply the tool or methodology to a limited project or a specific product line before scaling it across the entire collection. This controlled approach allows you to identify bottlenecks, validate outcomes, and refine processes without exposing the organization to operational risk.

Key questions:

- Which product or process can serve as a pilot case?
- What KPIs will we use to assess the pilot's success?
- How will we document insights to ensure scalable implementation?

5. **Analyze results and adjust the methodology**

Review the results obtained and make the necessary adjustments to adapt the methodology to the company's reality.

Key questions:

- Are the results obtained consistent with the environmental objectives?
- Which areas require improvement or greater data accuracy?
- What changes could we make to optimize the process?

6. **Integrate the tools into the design process and collection management**

Incorporate the use of tools and methodologies into the regular workflow so that sustainability becomes part of decision-making from the design phase through to the end of the product's life cycle.

Key questions:

- At which stages of the design process should the tool be applied?
- How do we connect the results with purchasing or product development decisions?
- Who will be responsible for maintaining this integration in the long term?

7. Communicate and validate the results

Make progress visible both internally and externally (in compliance with green claims requirements). Sharing results with the value chain and validating them through audits or certifications strengthens credibility and commitment to sustainability.

Key questions:

- How will we communicate the results to the internal team and external partners?
- Do we need external validation or certification?
- What information can we share in a transparent and verifiable way?

Decarbonization tools

Qualitative

- **Climate impact checklists:** Verification lists to identify processes, materials, or stages with higher energy use or dependence on fossil fuels.
- **Internal process maps:** Visual representation of production and transport flows to detect emission hotspots.
- **Internal diagnostic workshops:** Team sessions to reflect on habits, mobility, waste, and energy consumption.

Quantitative

- **GHG Protocol:** Global framework for calculating greenhouse gas emissions across three scopes (Scopes 1, 2, and 3).
- **ISO 14064:** International standard for quantifying and reporting corporate emissions.
- **Product Carbon Footprint (PCF):** Specific calculation of the carbon footprint of a product or collection.
- **Science Based Targets (SBTi):** Framework for setting emission reduction targets aligned with the Paris Agreement.

Decarbonization guidelines

1. **Define the scope**

Determine the scope of emissions to be measured based on the company's activities and value chain. This includes direct emissions (Scope 1), indirect emissions from energy consumption (Scope 2), and other emissions from the supply chain, transport, or product use (Scope 3).

Key questions:

- Which activities generate direct emissions in my company?
- Do we have data on energy consumption or fuel use?
- How can we engage suppliers and partners to obtain Scope 3 information?

2. **Choose the most appropriate methodology or tool**

Select the method that best aligns with the company's objectives: corporate emissions accounting (ISO 14064), product- or collection-level calculation (LCA or PEF), or harmonized methodologies such as PEF for EU reporting.

Key questions:

- Do we need to calculate the footprint of a specific product or of the entire company?
- What internal resources do we have to carry out the calculation (time, data, expertise)?
- Who do we want to collaborate with that best fits our capabilities?

3. **Train the internal team**

Equip design, production, and sustainability teams with the knowledge required to understand how the tools work and how to apply them correctly. Training ensures process continuity within the company.

Key questions:

- Who will lead the actions within the company?
- What level of training or external support is required?
- How can we ensure the involvement of all departments?

4. Run a pilot test

Apply the selected methodology or tool to a specific collection, product line, or defined scope. The pilot allows verification of data availability and tool functionality before conducting a full assessment.

Key questions:

- Which part of the business is most representative to start the pilot?
- Do we have sufficient data to calculate emissions in this specific case?
- What insights can we gain before scaling the system?

5. Analyze the results

Interpret the results obtained to identify areas for improvement, adjust the methodology, and define realistic and achievable emission reduction targets.

Key questions:

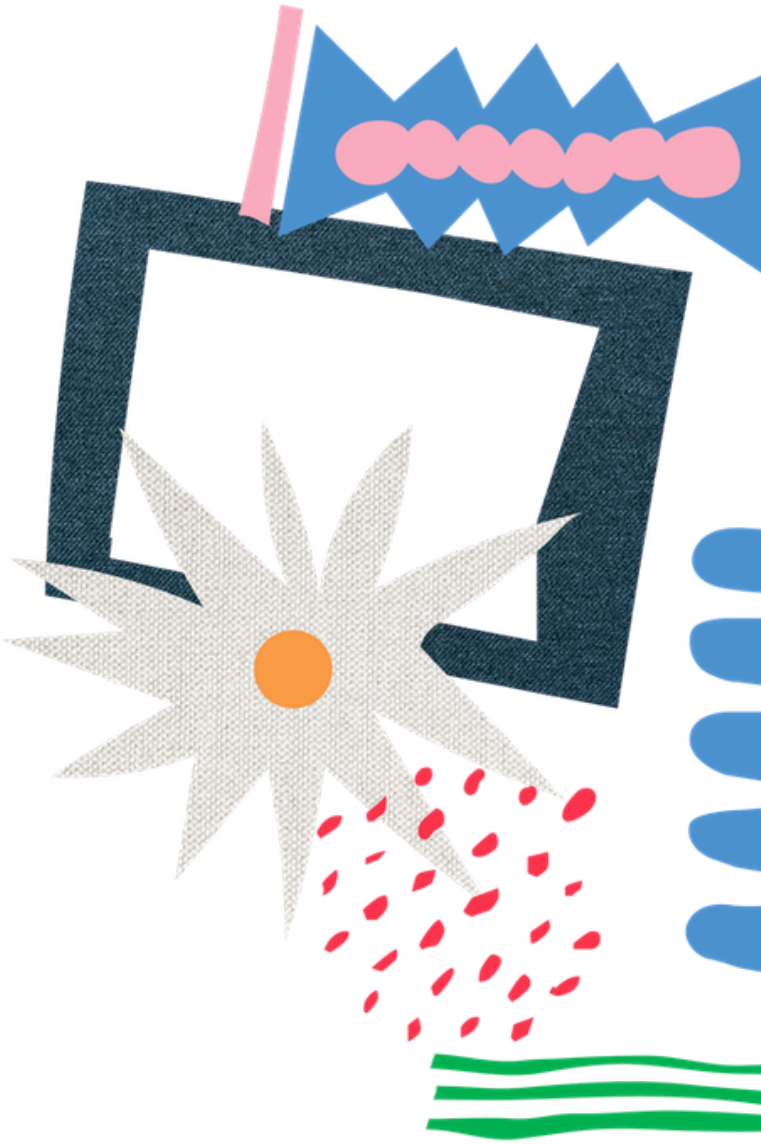
- Is the data reliable and representative of our entire activity?
- Which processes or materials account for the majority of emissions?
- Which actions can deliver the most immediate and measurable impact?

6. Integrate the tools

Incorporate the tools and methodologies into the design process of collections, logistics, stores, factories, and other operations so that decarbonization becomes a natural part of creative, technical, and strategic decision-making.

Key questions:

- At which stage of the design process can we introduce emission reduction criteria?
- How can we use technologies to reduce our emissions?
- How do we ensure that the calculation results are applied across the entire company?



7. Communicate

Share the results with the value chain, clients, and suppliers in a clear and transparent way, validating them through audits or external certification bodies.

Key questions:

- Which results can we communicate in a transparent and verifiable way?
- How can we engage our suppliers and clients in our climate objectives?
- Which channels will we use to communicate progress (website, reports, labels, CSRD reports)?

Green Claims tools

Qualitative

- Internal checklists: reviews of material information and analysis results; claim review meetings.

Quantitative

- LCA / PEF for product footprint; GHG Protocol / ISO 14064 for corporate claims; durability testing for use/lifespan claims.

Certifications

- Traceability platforms, recognized certifications (GRS/RCS, GOTS/OCS, Fairtrade), and evidence that can be demonstrated as verifiable proof.

Green Claims Guidelines

1. Conduct an initial claims assessment

Before integrating tools or methodologies, it is necessary to identify the environmental claims currently being used (on products, website, social media, or packaging). This assessment allows you to detect which claims are substantiated and which require additional data or verification.

Key questions:

- Which environmental claims are we currently communicating?
- Do we have documented evidence or data to substantiate them?
- Are there duplications, inconsistencies, or risks of greenwashing?

1. **2. Apply qualitative methodologies**

Qualitative tools enable an initial, straightforward assessment and support the diagnosis and review of internal processes.

Key questions:

- Have we established an internal claims review policy?
- Who is responsible for validating information before it is published?
- Do our commercial practices comply with the UCPD (Unfair Commercial Practices Directive)?

3. Gradually incorporate quantitative tools

Apply quantitative methodologies to obtain objective data. For products, methodologies such as LCA (Life Cycle Assessment) or PEF (Product Environmental Footprint) can be used; at corporate level, GHG Protocol or ISO 14064 can be applied to calculate emissions and carbon footprint.

Key questions:

- Do we have sufficient data to apply a quantitative methodology?
- Do we need external support to carry out the calculations?
- Which indicators will we use to validate the results?

4. Strengthen the required information with recognized certification

Certifications can serve as evidence. It is essential to use recognized and traceable labels. It is also useful to combine them with traceability platforms or value chain mapping systems.

Key questions:

- Are our certifications valid and verified by third parties?
- Which part of the product or process do they specifically cover?
- Do we have an internal system in place to maintain documentary traceability?

5. Train the teams

Marketing, purchasing, and design teams must understand how to communicate without compromising creativity. Training reduces errors and ensures consistency across all channels.

Key questions:

- What level of knowledge do the teams have regarding environmental claims?
- Is specific training needed on LCA, GHG, or sustainable labeling?
- How will we ensure that training remains up to date?

6. Document and communicate with transparency

Every environmental claim must be supported by verifiable and documented evidence. Companies should retain the reports, data, and certificates that substantiate their claims, and communicate only what can be proven.

Key questions:

- Do we have an internal archive with all the evidence supporting each claim?
- What information will we share publicly and what will we keep as technical backup?
- Can we demonstrate the accuracy of the claim if requested by an authority?

7. Review and continuously improve

Verification criteria evolve in line with European regulation. It is advisable to establish a periodic review schedule to maintain compliance and identify new opportunities for improvement.

Key questions:

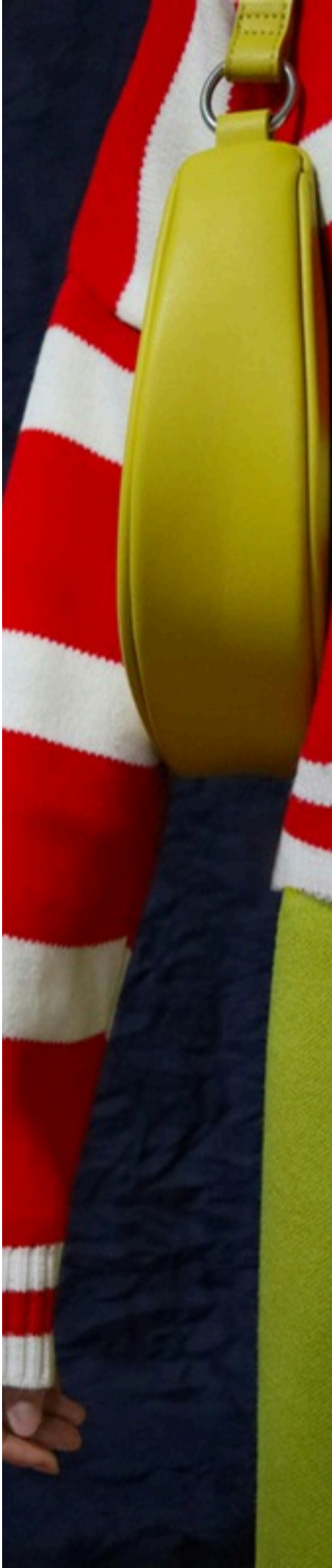
- How often do we review our environmental claims?
- Are there regulatory changes that affect us (e.g., Green Claims Directive, CSRD)?
- How can we improve data accuracy and transparency?

Glossary

- **Scope:** Refers to the boundaries of the greenhouse gas emissions calculation that a company decides to include in its analysis. According to the GHG Protocol, emissions are divided into three main categories:
  - **Scope 1:** direct emissions from sources that are owned or controlled by the company (combustion, vehicle fleets, industrial processes).
  - **Scope 2:** indirect emissions from purchased energy (electricity, steam, heating, or cooling).
  - **Scope 3:** indirect emissions generated by activities outside the company's direct control (suppliers, transport, product use, and end-of-life).

- **Climate adaptation:** Adjustment of human or natural systems to minimize the negative effects of climate change.

- **Life Cycle Assessment (LCA):** A quantitative methodology that evaluates the environmental impact of a product or process throughout its entire life cycle—from raw material extraction to end of life.



- **Environmental audit:** A systematic process to review a company's compliance with environmental objectives and to validate the data obtained in its reports or assessment tools.

- **Circularity:** A concept that describes the ability of a product or system to maintain the value of materials and resources for as long as possible through strategies such as reuse, repair, or recycling.

- **CO_2 equivalent (CO_2e):** A unit of measurement that allows different greenhouse gases to be compared according to their global warming potential.

- **Decarbonization:** The process of reducing or eliminating greenhouse gas (GHG) emissions associated with human activities, particularly the production and consumption of energy and materials.

- **Directive:** A legislative act of the European Union that sets objectives which Member States must achieve, while allowing them flexibility in how to implement them within their national legal frameworks.

- **Durability:** The ability of a product to maintain its functionality and quality over time, minimizing the need for replacement.

- **Ecodesign:** A design process that integrates environmental and social criteria at all stages of product development to reduce impact and enhance circularity.

- **Large enterprise:** A company that has 250 or more employees, or an annual turnover exceeding €50 million, or an annual balance sheet total exceeding €43 million.

- **Medium-sized enterprise:** A company with between 50 and 249 employees, an annual turnover not exceeding €50 million, or an annual balance sheet total not exceeding €43 million.

- **Small enterprise:** A company with fewer than 50 employees and an annual turnover not exceeding €10 million.

- **Fairtrade:** An international certification system that ensures products are made in accordance with fair social, economic, and environmental criteria, guaranteeing minimum prices for producers and decent working conditions in developing countries.

- **End of life:** The final stage of a product's life cycle, where options for reuse, recycling, or material recovery are determined.

- **GOTS (Global Organic Textile Standard):** An international standard for textile products made with organic natural fibers. It ensures environmental and social compliance throughout the entire production chain, from raw material to final labeling.

- **Greenwashing:** A misleading marketing or communication practice whereby a company or brand presents itself as more sustainable or environmentally friendly than it actually is, exaggerating or falsifying its environmental efforts.

- **GRS (Global Recycled Standard):** An international certification that verifies the recycled material content in a product and ensures responsible environmental, social, and chemical practices throughout the production chain.

- **ISO (International Organization for Standardization):** An independent international organization that develops globally recognized technical standards to ensure the quality, safety, and efficiency of products, services, and systems. In the environmental field, ISO 14001 (environmental management) and ISO 14040 (life cycle assessment) are particularly relevant.
- **KPI (Key Performance Indicator):** A key metric used to measure the effectiveness or progress of an action or strategy within an environmental or ecodesign plan.
- **Climate mitigation:** A set of actions aimed at reducing the concentration of greenhouse gases (GHG) in the atmosphere.
- **Climate neutrality:** A situation in which net greenhouse gas emissions are equal to zero, achieved through the reduction and offsetting of residual emissions.

- **OCS (Organic Content Standard):** Certification that verifies the presence and amount of organic material in a final product. It ensures the traceability of organic material throughout the entire supply chain but does not include additional environmental or social criteria.

- **Digital Product Passport (DPP):** A digital system established under European regulation that will collect information on the origin, composition, reparability, and sustainability of products.

- **Carbon footprint:** The total amount of greenhouse gases emitted directly or indirectly by an organization, product, or service, expressed in tonnes of CO_2 equivalent.

- **Emission reduction plan:** A corporate strategy that defines targets, actions, and timelines to reduce the carbon footprint.

- **RCS (Recycled Claim Standard):** A certification that assesses and verifies the percentage of recycled material present in a product, ensuring traceability from the material source to the final product.

- **Recyclability:** The ability of a product or material to be processed and reused to manufacture a new product while maintaining its quality and value.

- **Regulation:** A legal framework that establishes requirements, obligations, and procedures that must be directly complied with in all European Union Member States, without the need for national transposition.

- **Repairability:** The ease with which a product can be repaired or upgraded to extend its lifespan and reduce waste generation.

- **Science Based Targets (SBTi):** An international initiative that promotes companies setting emission reduction targets aligned with climate science and the Paris Agreement. SBTi ensures that corporate decarbonization strategies contribute to limiting global temperature increase to 1.5°C above pre-industrial levels.

- **Traceability:** The ability to track the journey of a product, component, or material throughout the entire value chain, from origin to the final consumer.

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