Brussels, 20 July 2026

To: Mr Matjaž Malgaj, Head of Unit, Sustainable Products, Directorate-General for Environment, European Commission

Ms Giulia Del Brenna, Deputy Director / Head of Unit - Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs, European Commission

Subject: Concerns regarding the potential omission of measures to address microplastic pollution from the Ecodesign for Sustainable Products Regulation delegated act on textiles

Dear Mr Matjaž Malgaj and Ms Giulia Del Brenna,

We, the undersigned research scientists and knowledge holders working in sustainability, environmental toxicology and microplastic pollution, are writing to express concern regarding the conclusions of the preliminary study undertaken to inform the European Commission's ongoing development of the delegated act on apparel under the Ecodesign for Sustainable Products Regulation (ESPR) and in particular the absence of any proposed measures to reduce microplastic pollution from textiles.[1] The ESPR aims to reduce the overall environmental and climate impacts of products and set minimum sustainability requirements for products on the EU market, including in relation to microplastic pollution. However, the preliminary study concludes that it is not possible to identify pollution hotspots and that the absence of standardised definitions of biodegradability and standardised methods for the sampling, characterization and quantification of these pollutants in all release points of the value chain prevents the identification of mitigation strategies.

There is more than sufficient peer-reviewed evidence to guide urgent policy action on this issue. Synthetic microfibres released during the manufacture, washing and wearing of garments are a major source of microplastic pollution. Critically there is strong evidence that changes at the design stage, such as using different manufacturing, weaving and finishing processes will substantially reduce these releases.[2,3,4,5,6] Delaying policy and technical measures along the entire value chain until standardised definitions of biodegradability and standardised methods for sampling, characterization and quantification of these pollutants are finalised, is not necessary and merely perpetuates avoidable environmental harm.

Microplastic emissions from textiles warrant immediate action because:

- Synthetic textiles are among the top contributors to microplastic pollution globally and in the EU.[7] Current patterns indicate that emissions of microplastics from textiles are projected to rise by approximately 22% by 2030.[8]
- Synthetic microfibres originate from textiles made of synthetic materials.[9,10,11] Releases of synthetic microfibres occur throughout the textile lifecycle - during manufacturing, wearing, washing, drying, and disposal.[12,13]
- Synthetic microfibres are in the air we breathe, the water we drink and the food we eat and are found across all environmental compartments - air, freshwater, marine sediments, soil, and biota.[14,15]
- Synthetic microfibers accumulating in the environment now contaminate the planet from the poles to the equator with clear evidence of environmental accumulation and toxicological effects from these fibres.[16,17,18,19]
- Low rates of biodegradability for synthetic microfibres are well established and not in dispute.[20,21] It is not clear how understanding rates of environmental degradation can help drive more sustainable design practice focused on increased durability and circularity.
- Synthetic microfibre emissions are not a marginal issue—they are central to reducing microplastic pollution. Design and manufacturing choices can substantially reduce shedding rates, according to fabric type, construction, and mechanical treatments.[22,23,24]
- There is clear evidence that upstream measures can significantly reduce shedding during the manufacture and use phase, with the potential to reduce releases during laundering by around 65%.[25,26,27, 28,29,30]

We urge the European Commission and Joint Research Centre to:

- Include microplastic shedding as a standalone performance and information requirement, in the form of performance-based limits on microplastic loss from garments. This should be addressed alongside durability, recyclability, chemical safety, and other environmental impacts.
- Act on available standards and measurement protocols. For example, the ISO 4484:2023 series provides test methods for assessing synthetic fibre loss. It is already in use and enables benchmarking across product, yarn and fibre types. ISO 4484-2:2023 can be used to assess microplastics present in samples collected at different stages of a textile's lifecycle, including during production processes.[31]
- Complement design focused measures by supporting mandatory filtration and pre-washing at the manufacturing stage.[32,33,34] Upstream controls are vital, as evidence shows that manufacturing stages are among the highest emission points for microfibres.[35,36,37]
- Ensure that any interventions advocated to capture microfibers are appropriately tested to ensure they are fit for purpose.[38]

- As a member of the High Ambition Coalition and a major driver of the Global Plastic Treaty process, support mandatory provisions on product design that address microplastics pollution at the international level.
- In parallel, continue to support research to better understand the impacts of microplastic accumulation in the environment and effective design-based approaches to improve the sustainability and safety of apparel, including via approaches to minimise microfibre shedding from synthetic, semi-synthetic and natural fibres.

In our view, the field is more than sufficiently mature to justify informed regulatory choices and the absence of standards across the entire value chain does not present a valid reason to delay in taking *practical* action now. We remain available to provide evidence or join a technical discussion on how to design credible, science-based policy requirements under the ESPR.

Signatures

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