

MAKE THE LABEL COUNT

CAMPAIGN PROGRESS REPORT

July 2024

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CAMPAIGN OVERVIEW

CAMPAIGN AIM

The aim of the Make the Label Count (MTLC) campaign is to work with the European Commission to improve the PEF methodology before it is introduced in the EU market for apparel and footwear so that natural fibres do not receive a bad rating based on incomplete information.

CAMPAIGN APPROACH

- Coalition engagement – onboard partners from global natural fibre organisations, environmental and social NGOs and others who share our concerns to amplify the campaign.
- EU policy maker engagement – meeting with Commission staff and Members of the European Parliament (MEPs) to positively influence EU policy and legislative development.
- Social, digital and media campaign – layered campaign including advertorials in Brussels-focussed publications, social media channels to target content at EU policy makers, website to house campaign resources, media briefings, speaking opportunities and more.

CAMPAIGN SPOKESPERSON



Dalena White

Secretary General

International Wool Textile Organisation

CAMPAIGN MANAGEMENT

CAMPAIGN MANAGEMENT

The equivalent of 1 full-time and 2 part-time staff employed by Australian Wool Innovation (AWI) / The Woolmark Company to actively manage all aspects of the campaign including: Coalition onboarding and management, stakeholder engagement (attending and presenting at meetings with policymakers and building networks), preparing responses to inquiries, preparing presentations, fact sheets and one-pagers, social media management, website management, speaking opportunities at webinars and conferences, and much more.

Additional AWI resources are also used to create campaign collateral and graphics, support with social media posting and website development and management.

ADVOCACY EXPERTS

A 5-person team from the Brunswick Group office in Brussels has been supporting the campaign from the outset. The Brunswick team provides critical policymaker engagement, including identifying key policy makers and arranging meetings. They monitor and review legislative proposals, draft suggested amendments and advocate to policymakers to adopt said amendments.

RESEARCH EXPERTS

Research experts are engaged through International Wool Textile Organisation to support in developing policy positions and reviewing legislative developments.

CAMPAIGN MANAGER

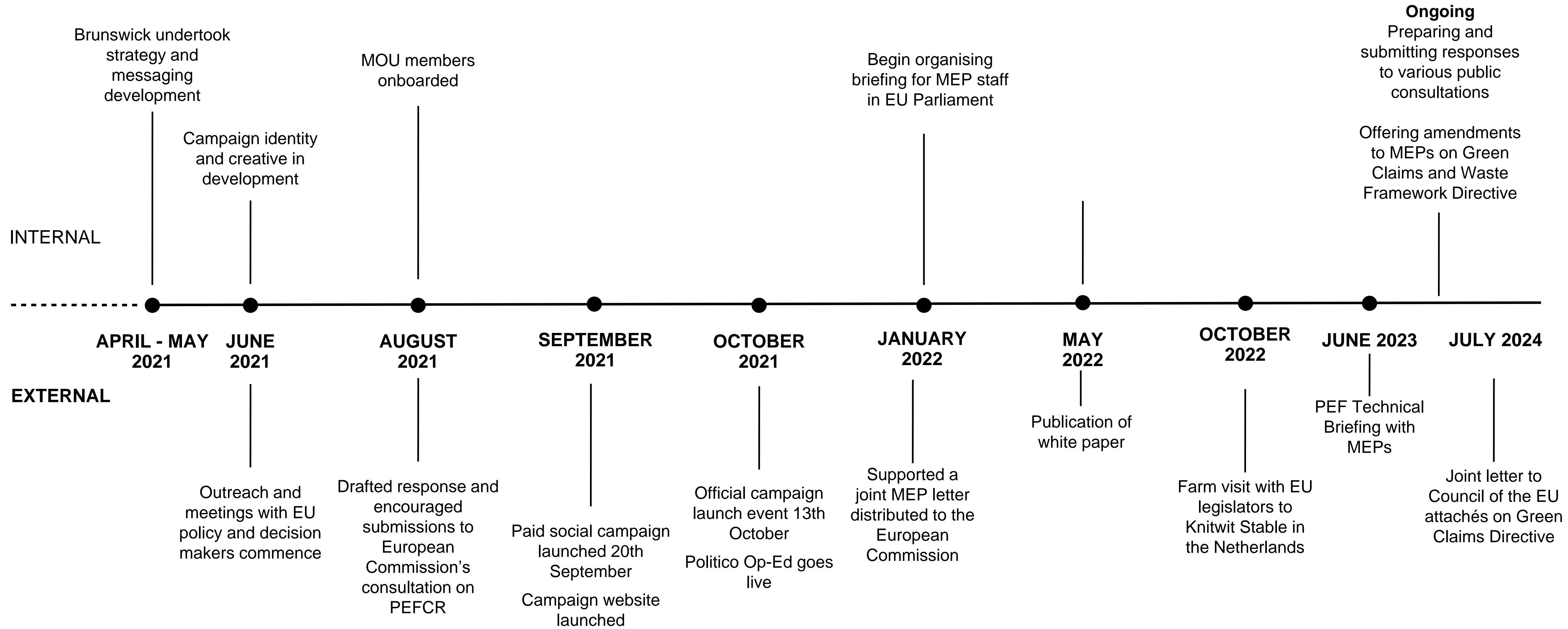


Elisabeth van Delden

Sustainability Manager Europe

Australian Wool Innovation / The Woolmark
Company

CAMPAIGN TIMELINE



Ongoing involvement in the PEF Technical Secretariat via the IWTO Wool LCA Technical Working Group at the cost of 60.000 EUR.

OVERVIEW OF CAMPAIGN ACTIVITIES & PROGRESS

CAMPAIGN ACTIVITIES

- Meeting with members of the European Parliament, Council of the European Union and European Commission
- Drafting amendments to the EU legislation
- Organising events and on-site visits
- Drafting open and opinion editorials
- Contributing to public consultations
- Engaging on social media

CAMPAIGN PROGRESS

- 66 meetings with EU Institutional stakeholders, including:
 - 39 with MEPs/staff (including 2 MEP, 2 MEP assistants and 1 European Parliament's think tank advisor for the farm visit)
 - 12 with European Commission
 - 14 with EU Permanent Representatives
 - 1 civil society associations
- Email outreach to 433 EU Institutional stakeholders
- 37 Coalition Members

COALITION ENGAGEMENT

COALITION MEMORANDUM OF UNDERSTANDING (MOU)

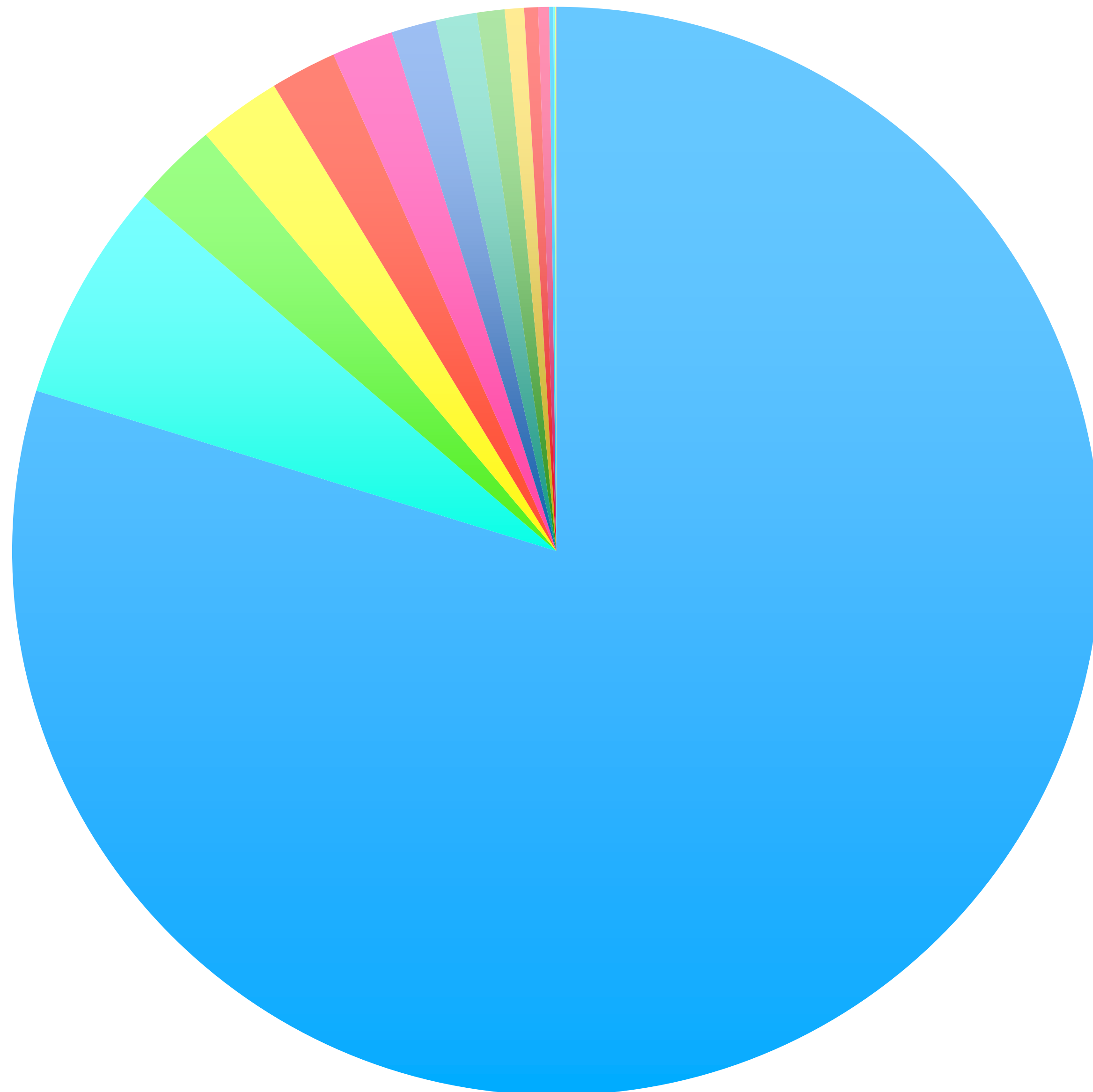
An MOU governs the MTLC Coalition. All Coalition members are invited to be active in the campaign to the extent that they're able to contribute.

ACTIVITIES TO DATE

- Total membership at 15 July 2024 is 37
- Regular meetings with Coalition members
- Bi-weekly EU policy newsletter (when Parliament is in session)
- Responding to EU consultations
- Signing joint open letters to the EU
- Coalition representatives engaged for content creation and speaking opportunities



FINANCIAL CONTRIBUTIONS 2021-2024

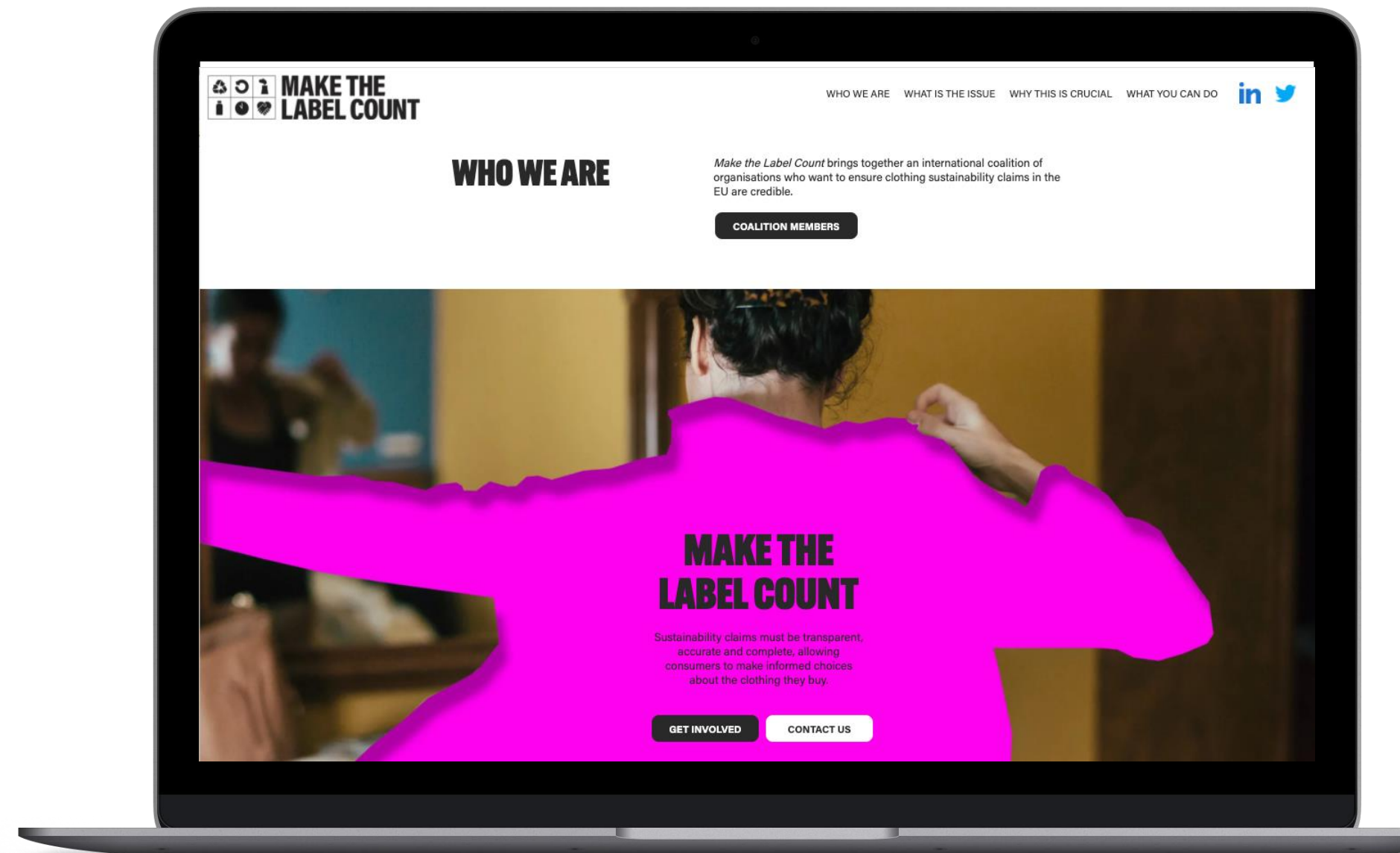


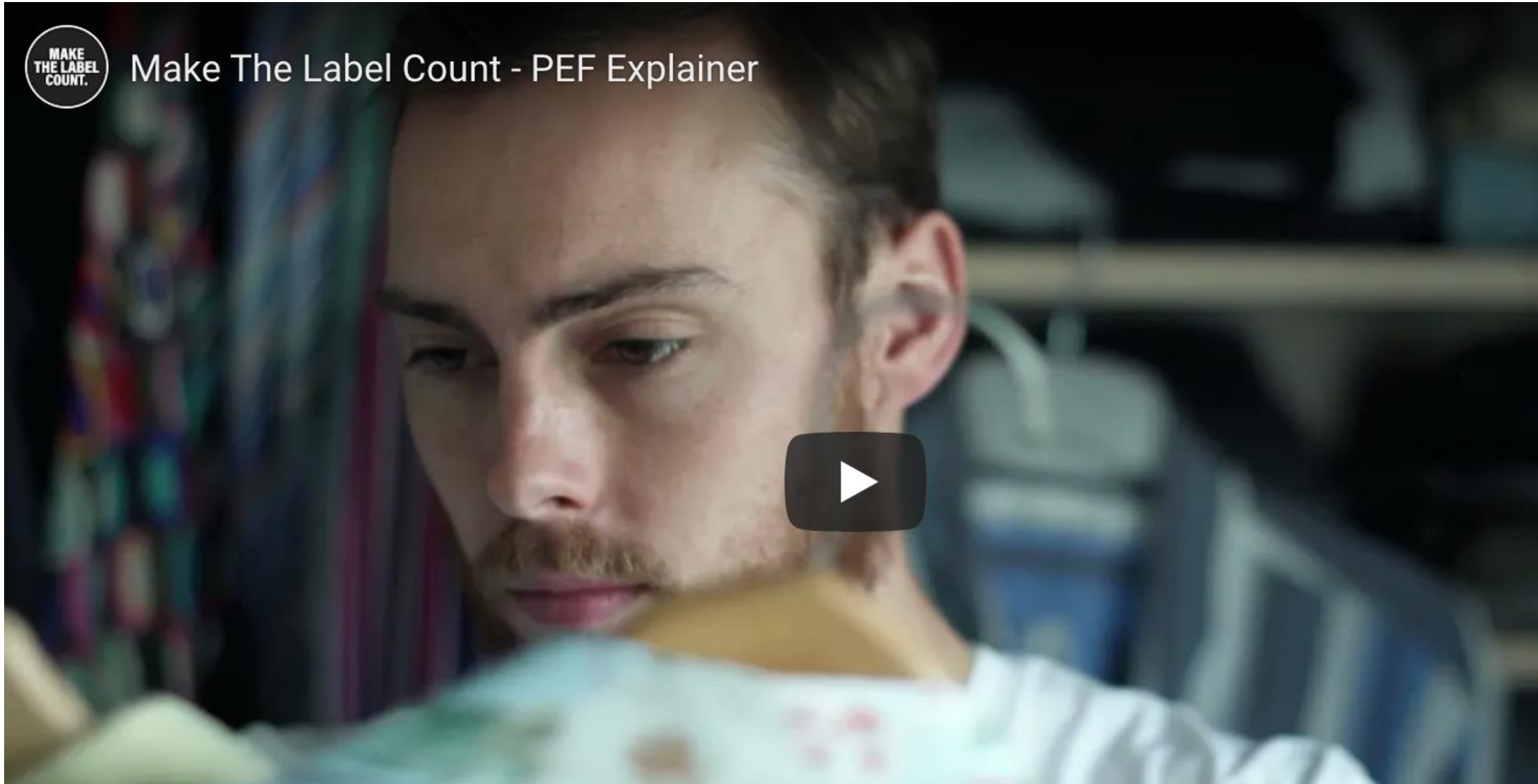
- Australian Wool Innovation - 80%
- Cape Wools SA - 7%
- Cashmere & Camel Hair Manufacturers (CCMI) - 3%
- IWTO Product Wellness Working Group - 2%
- G. Modiano - 2%
- GNIN-BNWTA - 2%
- American Wool Council - 1%
- IWTO Sustainable Practices Working Group - 1%
- Tianyu - 0.8%
- International Sericultural Commission - 0.6%
- Cotton Egypt Association - 0.4%
- Mohair South Africa - 0.3%
- Zegna Baruffa Lane Borgosesia - 0.1%
- Keese International - 0.04%
- Discover Natural Fibres Initiative (DNFI) - 0.02%
- The Sourcery - 0.02%
- Private - 0.01%

CAMPAIGN IDENTITY

We developed an identity and a toolkit of creative assets for the Make the Label Count campaign using the key messages from the strategy and messaging development phase.

These assets are being used across all social and digital media and communications and the website.





VIDEO CONTENT

We created a short animated explainer video to build awareness of the Make the Label Count campaign and issues around the current PEF methodology.

We later created a short video that featured MTLC members talking about the importance of getting PEF right.

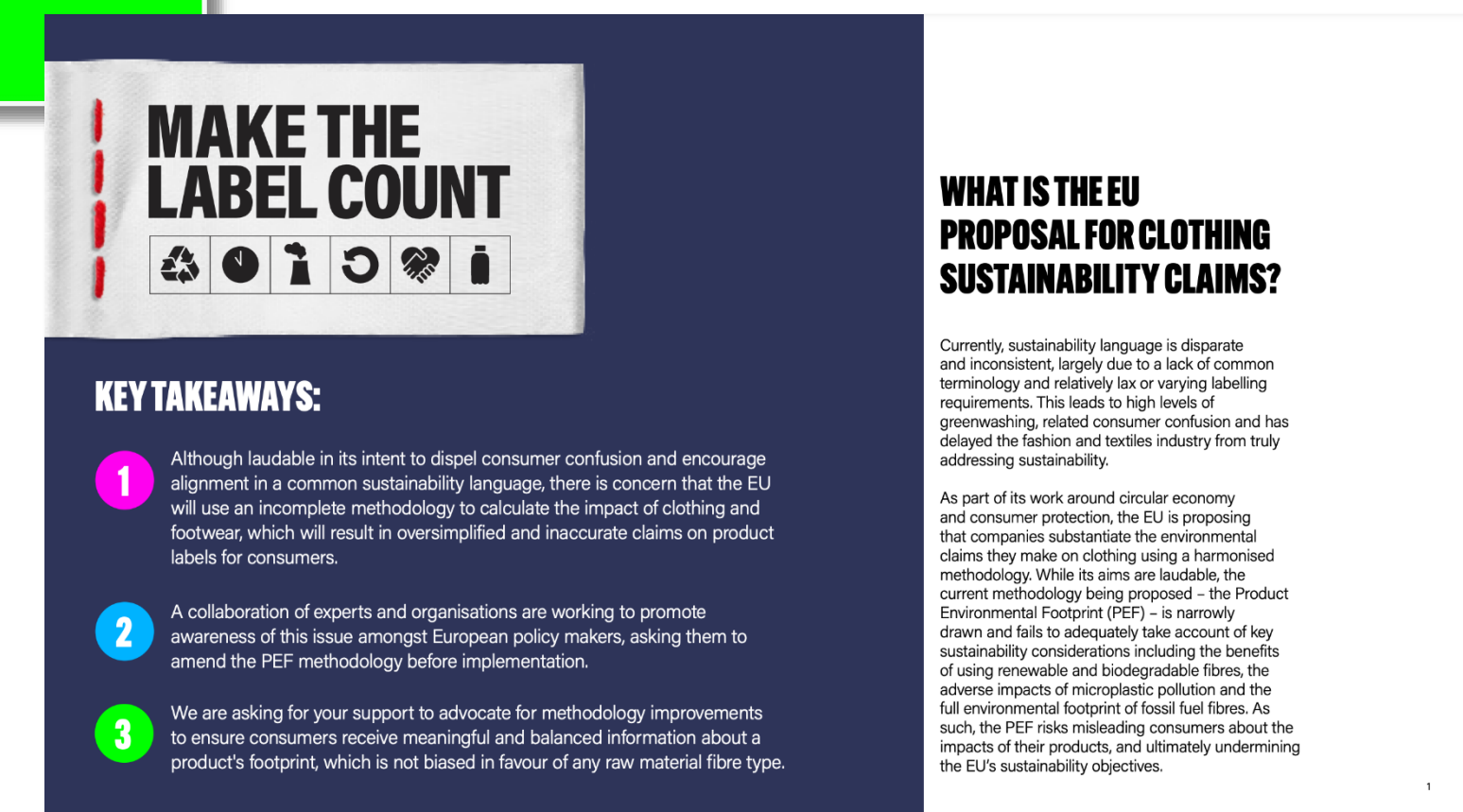
WATCH THE VIDEOS at
WWW.MAKETHELABELCOUNT.ORG

KEY CAMPAIGN DOCUMENTS

In June 2022, the campaign published its White Paper “*Delivering EU environmental policy through fair comparisons of natural and synthetic fibre textiles in PEF*”. It provides detailed analysis of the issues with the current PEF methodology and practical recommendations for improvements. The funding of independent researchers and drafting of this White Paper was provided by AWI.

EUROPEAN COMMISSION RESPONSE TO WHITE PAPER

We received a letter in response to the White Paper from Emmanuelle Maire (Head of Unit, DG ENV, European Commission). The Commission continues not to commit to the PEF as the primary methodology to be used in the Substantiating Green Claims proposal. It recognises the gaps in the PEF method on some aspects, such as biodiversity and microplastics, but provides only a top-line approach on how these gaps will be addressed. In response, MTLC drafted an Open Letter and an op-ed.



We also created an overview document that runs through the campaign aims and solutions. This was translated into five different European languages.

EARNED MEDIA COVERAGE

Apparel Insider

Why Apparel Insider? Magazine Newsletter sign-up Reports and Briefings Contact Us

News / Has fashion hijacked the EU's eco-label for clothing?

Protect your brand with Oritain.
Mitigate risk and meet regulatory requirements by verifying the origin of your cotton.

THE BRAND DISRUPTING FASHION RETAIL

SHEIN

Has fashion hijacked the EU's eco-label for clothing?

By Brett Mathews June 14, 2024

Spread the love

BRUSSELS – Almost 900 signatories representing hundreds of thousands of chains have signed a letter to the EU Council voicing concerns that its proposed Green Claims Directive has been hijacked by fast fashion.

The letter points out that only major brands such as H&M, Nike, Inditex and others participate and vote in the Product Environmental Footprint tool within the

Yahoo!life

Well-being COVID-19 Parenting Style & Beauty Family Favorites Horoscopes

By 2023, Clothes in EU Need Eco Label, Campaigners Say 'Incomplete' at Present

Kaley Roshitsch
October 14, 2021 · 3 min read

By 2023, all clothing sold in the European Union will have to bear an eco label — the nature of this label is still being decided.

With the EU's shift to becoming a climate-neutral and circular economy in line with

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Ethical and green living

EU eco-labels for fabrics not strict enough, say campaigners

Make the Label Count campaign says system due to come into force in 2023 is misleading and outdated

Just Style

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News

Farmer livelihoods 'at risk' on Green Claims Directive PEF focus

A global collective of over 800 apparel and textile industry stakeholders have written a letter to the Council of the European Union voicing strong concerns about the proposed Green Claims Directive and its reliance on the Product Environmental Footprint (PEF) methodology, which they believe "unfairly" favours synthetic materials over natural fibres, putting farmer livelihoods at risk.

Isatou Ndure June 14, 2024

Share

SUSTAINABILITY

Is the EU about to give synthetic fibre makers a competitive advantage?

An EU Green Claims Directive proposed by the European Commission intended to stop greenwashing, may play to the advantage of producers of synthetic fibres, say farmers. There's a great deal at stake.

BY SOPHIE BENSON
June 20, 2024

perspective representing a critical mass — or at least 50 percent of the industry — the EU Commission named the Sustainable Apparel Coalition the leading secretariat for the apparel and footwear industry.

Story continues

L'Espresso
MODA

In evidenza In edicola Fiume di denaro: inchieste Podcast Lab24: i visual

24+ Abbonati

Allerta «greenwashing»

Appello all'Unione europea per un'etichettatura trasparente

di Redazione Moda
13 ottobre 2021

Una nuova coalizione internazionale di organizzazioni e associazione sta lanciando la campagna **Make the Label Count** (letteralmente: facciamo in modo che le etichette contino davvero) chiedendo alla Commissione europea di garantire sull'abbigliamento **etichette di sostenibilità trasparenti, complete e accurate.**

Lo scopo dell'etichetta sulla sostenibilità

L'Unione europea si sta spostando verso un'economia climaticamente neutra e circolare, in linea con la propria agenda Green Deal, in cui i prodotti sono progettati non solo per essere più efficienti dal punto di vista energetico, ma anche più durevoli, riutilizzabili, riparabili e riciclabili. «Questa transizione è particolarmente importante per l'industria della moda e del tessile a causa della sua significativa impronta ambientale», si legge nell'appello di Make the Label Count. Per consentire ai consumatori di attuare decisioni di acquisto più ecologiche, la Commissione europea sta proponendo ai consumatori un **sistema obbligatorio di etichettatura per l'abbigliamento e le calzature.**

SOCIAL CAMPAIGN

LINKEDIN & X

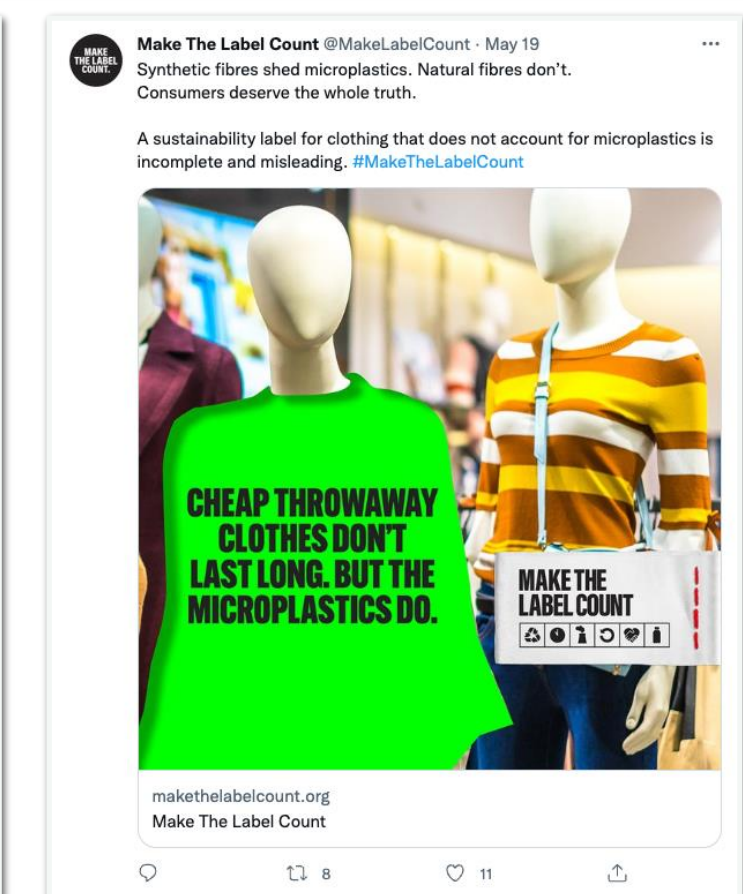
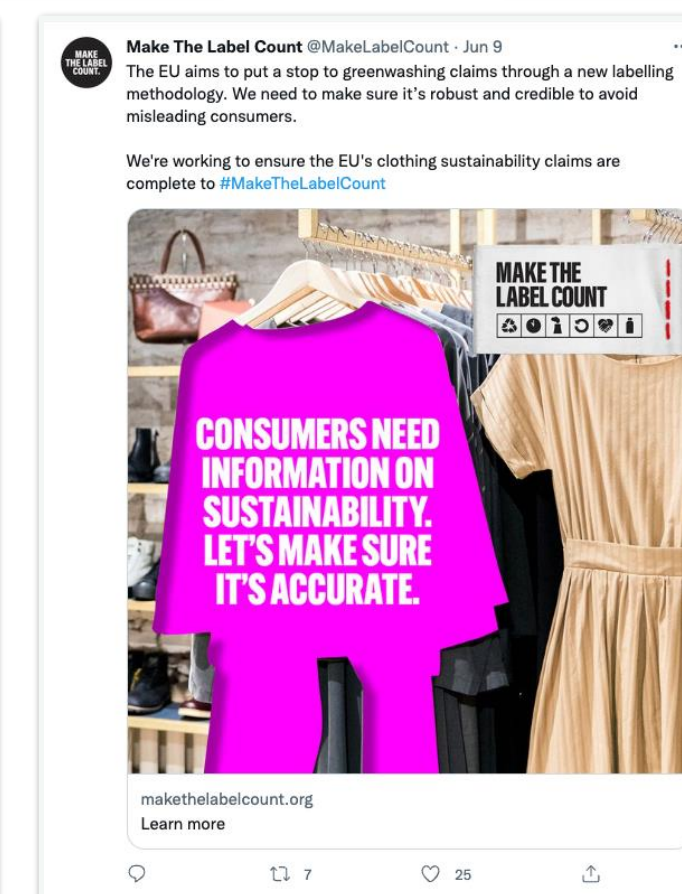
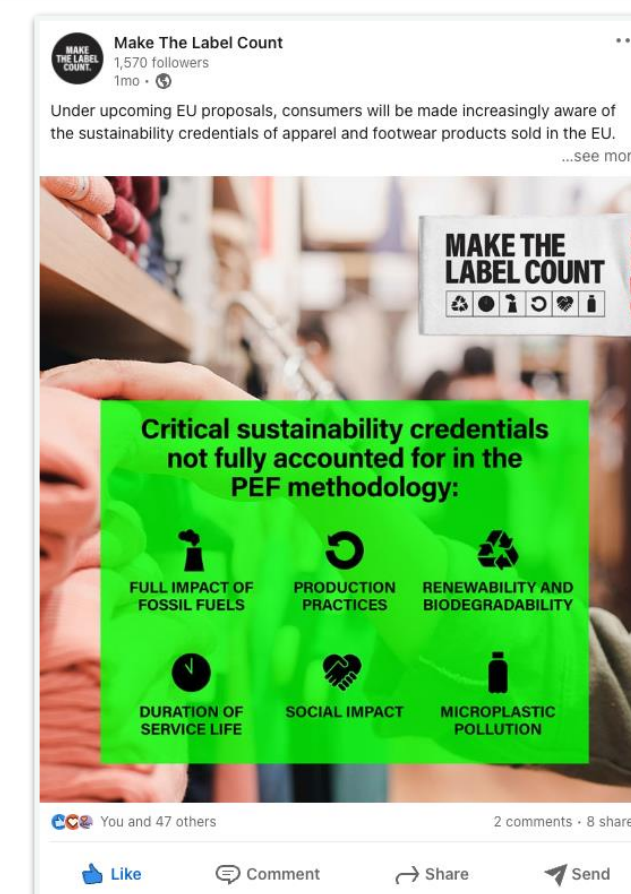
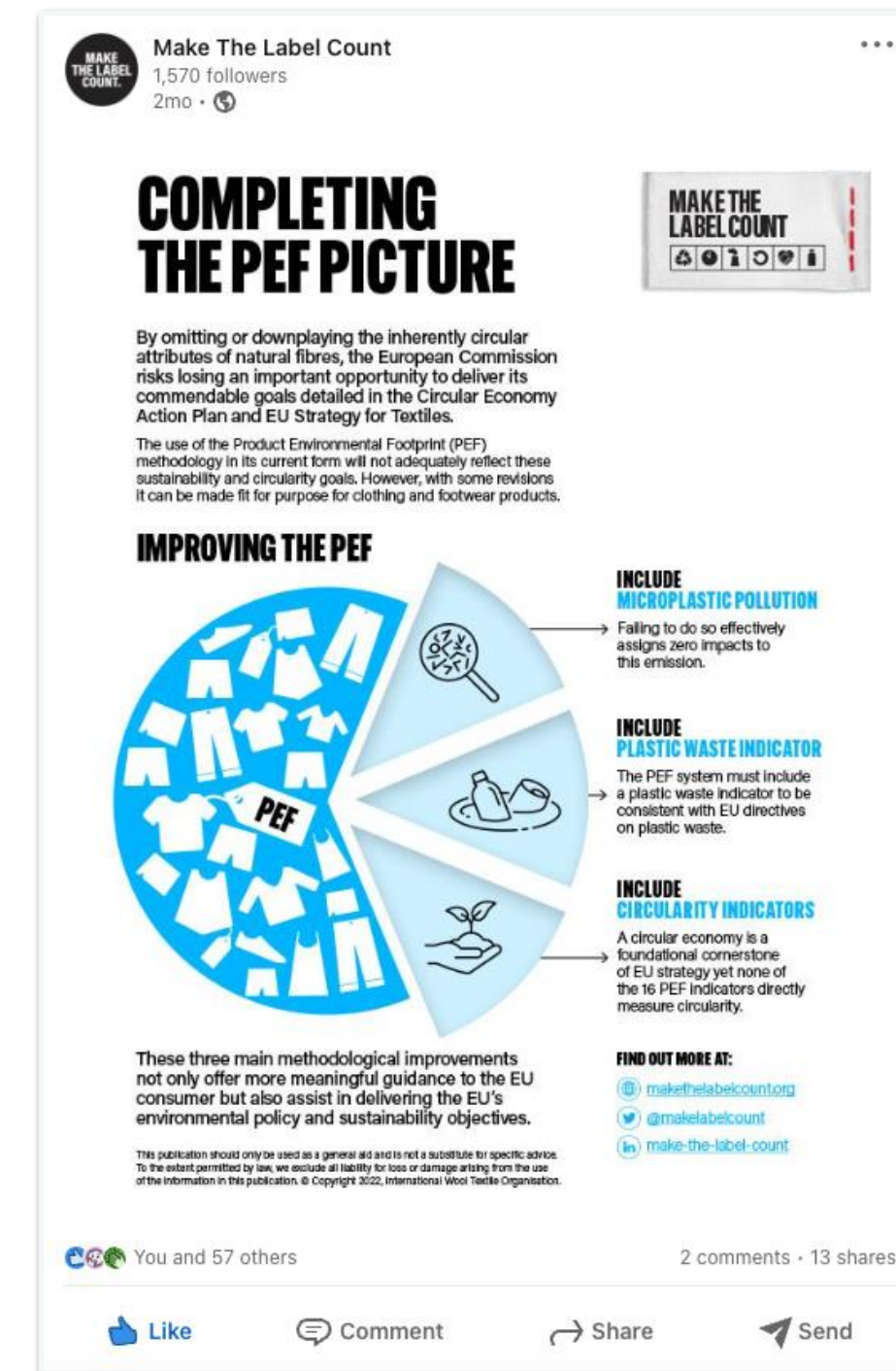
Social media content includes bespoke images and social media tiles that have been specifically produced in-house to promote our key messages, as well as a hero infographic to clearly explain MTLC's recommendations.

We continue to share third party content in the form of news articles as well as sharing relevant content from individuals (e.g. MEPs) and organisations (e.g. Changing Markets) on X and LinkedIn

On X, we target an EU-focussed audience with an interest in sustainability and the circular economy.

On LinkedIn we target our content to individuals who work in the European Parliament or European Commission. LinkedIn continues to be the stronger of the two channels, with a narrow targeting and a sharper focus on policy makers.

The social campaign was initially paid and geotargeted, however due to funding constraints, this ceased mid-2023.




OPINION EDITORIALS

Placement of paid articles in [October 2021](#), along with the ‘takeover’ of the sustainability section, and again in [November 2022](#). POLITICO is a highly read publication amongst EU policy makers and stakeholders. The articles performed well and within the benchmarks, in the busiest period of the year, with the highest number of sponsored articles being launched.

SPONSORED CONTENT FROM MAKE THE LABEL COUNT

A question of credibility – the EU’s green transition for textiles

Sustainability labels must be accurate and complete to empower consumers to make informed choices about the clothes they buy.



via Make the Label Count

BY DALENA WHITE, SPOKESPERSON, MAKE THE LABEL COUNT
October 4, 2021 | 8:30 am

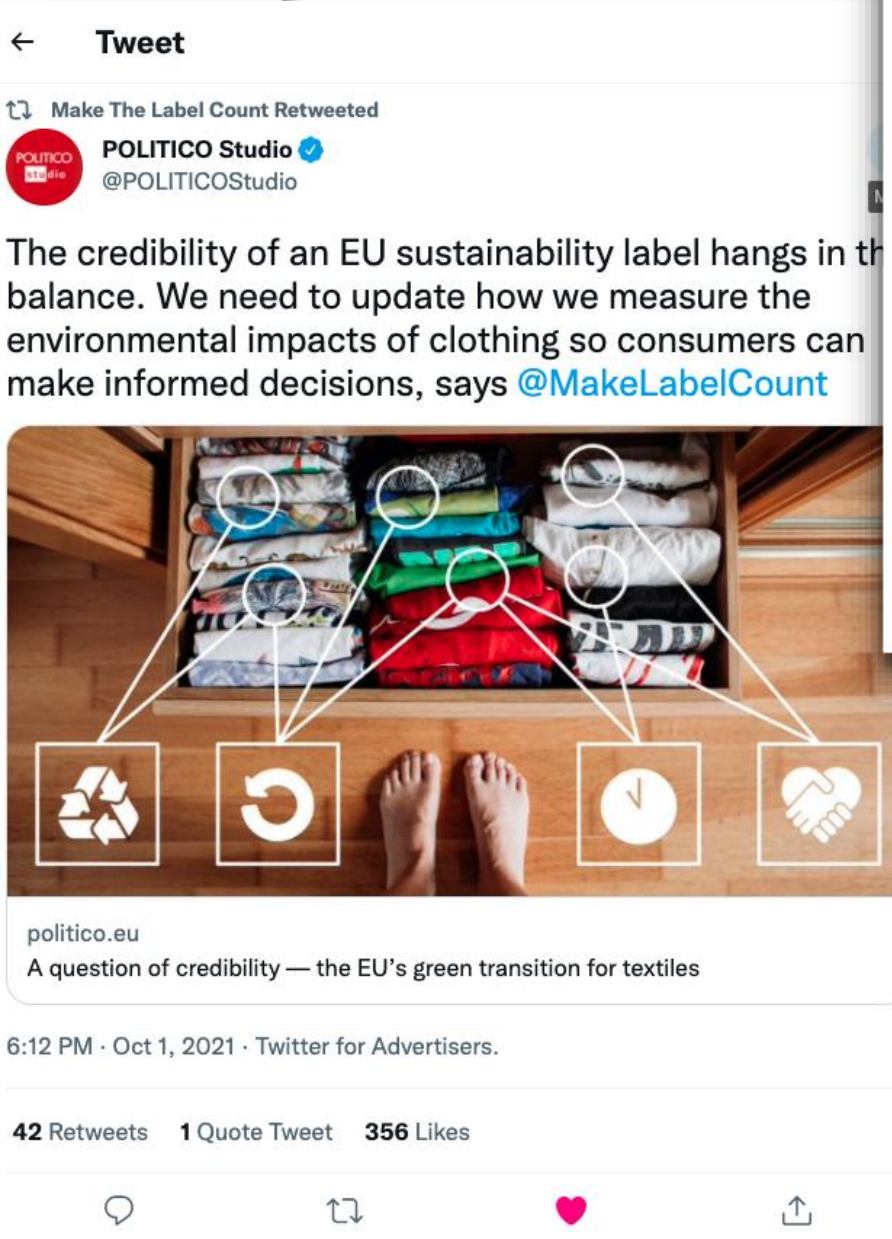
OCTOBER 2021

Tweet

Make The Label Count Retweeted

POLITICO Studio @POLITICOStudio

The credibility of an EU sustainability label hangs in the balance. We need to update how we measure the environmental impacts of clothing so consumers can make informed decisions, says @MakeLabelCount



politico.eu
A question of credibility — the EU’s green transition for textiles

6:12 PM · Oct 1, 2021 · Twitter for Advertisers.

42 Retweets 1 Quote Tweet 356 Likes

SUSTAINABILITY INSIGHTS

View in your browser or listen to audio

By LOUISE GUILLOT
with Leonie Cater and America Hernandez

PRESENTED BY



POLITICO

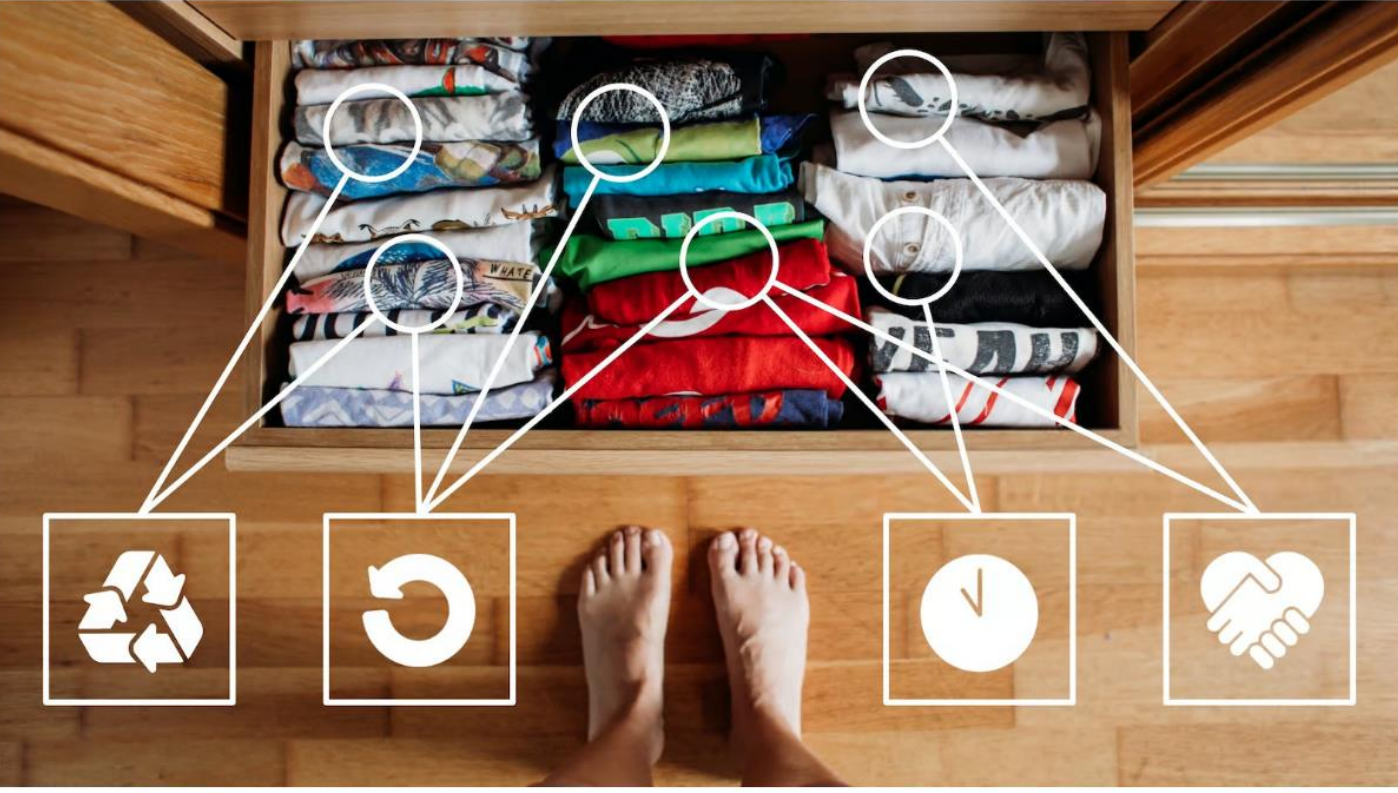
UK general election EU election results War in Ukraine Newsletters Podcasts Poll of Polls Policy news Events

SPONSORED CONTENT FROM MAKE THE LABEL COUNT

Putting fast fashion out of fashion

The EU is leading the global pathway towards sustainable clothing... but a course correction is needed.

SHARE



VIA Getty Images/Make the Label Count

NOVEMBER 8, 2022 5:00 AM CET
BY DALENA WHITE, SPOKESPERSON, MAKE THE LABEL COUNT

NOVEMBER 2022

OPEN LETTERS

Publishing of 4 individual joint-letters in November 2022 as well as in June 2024 to raise awareness of the impact EU legislation will have for natural fibre farmers as well as the shortcomings of PEF.



Joint open letter on concerns over PEF methodology for textiles

Brussels, 23rd November 2022

Dear Executive Vice-President Timmermans,

Dear Commissioner Thierry Breton,

Dear Commissioner Sinkevičius,

Dear Commissioner Wojciechowski,

CC Director Generals: Kerstin Jorna, Florika Fink-Hooijer, Wolfgang Burtscher.

We, the undersigned civil society, farmers, and business organisations, are writing to ensure that the methodology considered by the European Commission to assess the environmental impact of textile products provides for detailed, fair, and unbiased information. To this end, we insist on the need to reconsider the use of the Product Environmental Footprint (PEF) or any set of indicators mirroring the content of the PEF as the sole method to calculate such impact. The agreed methodology used to underpin the environmental impact of textile products must support the shift to a climate-neutral, energy-efficient, and circular economy, in line with the objectives of the Circular Economy Action Plan and specific EU Strategy for sustainable and circular textiles.

The current dominant textile industry is a major source of greenhouse gas emissions, excessive pesticide, insecticide, and chemical fertilizer use, damage to surrounding ecosystems, and threatening workers' health¹. This is exacerbated and fuelled by vast overproduction and overconsumption: between 2000 and 2014, clothing production in the EU doubled². Public opinion surveys evidence widespread EU citizens' dissatisfaction with the current textile sector: over 80% of EU citizens are in favour of an environmental impact label on clothing products, as well as stricter rules³.

A framework evaluating the environmental and social footprint can positively support the sustainability transition in the fashion and textile industry, prevent greenwashing, and provide transparent consumer information, but only if based on a methodology that adequately considers the externalities stemming from the textile sector^{4, 5}.

10th June 2024

Dear Council of the European Union,

We write to you in our capacity as researchers, concerned consumers, farmers, textile companies throughout the value chain, and NGOs regarding the European Commission's proposal on the Green Claims Directive (GCD), and the recent integration of references to the Product Environmental Footprint (PEF) in the text prepared for the Council for the European Union for June 17th 2024.

We welcome that the Council has articulated some reservations regarding the integration of PEF (i.e. recital 32) into GCD. However, as we will seek to demonstrate, references to the PEFCR for apparel and footwear as a preferred method is, as of June 2024, both premature and misleading.

In its current iteration, the PEFCR focuses overwhelmingly on technical durability, and fails to include other key environmental indicators related to Duration of Service (DoS) or, more simply put, the "lifetime" of products and how we use and wear them. As prolonged wear is the most effective means by which to reduce negative environmental impact, DoS is essential in ensuring true and fair product comparisons and, indeed, trustworthy substantiation of consumer facing claims.

Furthermore, current system boundaries produce additional discrepancies in how natural and synthetic materials are accounted for¹, disadvantaging natural materials and promoting continued plastification, by which the PEF risks misleading industry and consumers alike, while not contributing to the reduction of environmental stress from apparel and footwear.

As such, the omission of key indicators ultimately means that the PEF does not constitute a sufficient or valid tool for "empowering consumers for the green transition" in alignment with the purpose of the GCD, nor does it meet the EU's own target of making "fast fashion out of fashion", as stated in the EU Textile Strategy.

For example, the PEF demonstrates:

- **A lack of actual function in the calculations of the "functional unit" of apparel**
The duration and frequency of textile usage are paramount factors influencing environmental impact. The PEF focuses overwhelmingly on technical durability, i.e. a product's resistance to abrasion, pilling etc. Yet, only 37% of clothing is technically worn out before it is discarded, while 35% stems from a lack of perceived intrinsic value and 28% can be assigned to fit². Intrinsic qualities may also be referred to as "emotional durability", an issue for which there is, to this point, little empirical data that can be used in LCA-modelling³. To base claims on requirements concerning technical durability in clothing, when most of it is discarded for entirely different reasons, is thus not only futile; it can be directly harmful to both the environment and consumers, as demands for greater durability may favour a continued increase in synthetic materials, as well as prove inefficient in regulating consumed volumes. Furthermore, the PEFCRs unfairly disadvantage products made from natural fibres⁴, although

Fashion must protect our farmers, our land and our communities.

In an unprecedented move, hundreds of thousands of farmers from all over the world send urgent appeal to the European Council to protect their livelihoods and natural fibres from unjust fashion-focused policies favouring fossil fuel fibres.

Dear Council of the European Union,

We are writing to you as a global collective of farmers highly concerned about the impact of the Green Claims Directive regarding references of the Product Environmental Footprint (PEF) to substantiate claims.

Recent communications suggest that the European Council is endorsing PEF or PEFCR for apparel and footwear, which will be agreed upon on 17 June 2024. **The PEF methodology favours fossil fuel-derived materials over natural fibres, misrepresenting natural fibres in the environment and therefore posing a significant risk of injustice to farmers and the production of these natural fibres.**



Joint letter on urgent concerns and recommendations on the Green Claims Directive

Brussels, 6 June 2024

We, the undersigned, represent a coalition of natural fibre organisations, environmental non-governmental organisations and researchers committed to sustainability, consumer protection, and climate action. The signatories of this letter appreciate the Council's efforts to strengthen the Green Claims Directive, which aims to prevent greenwashing, a goal that the signatories of this letter fully support.

We write to express our collective concerns regarding the Council's current position on the Green Claims Directive regarding references to the use of the Product Environmental Footprint (PEF) as the methodology to substantiate claims.

It is imperative to improve the PEF methodology to ensure it accurately reflects the environmental impacts of the products in question. Until the PEF and PEFCR are improved, they should not be used to substantiate Green Claims as they risk further greenwashing.

We urge the Council to refrain from:

- (1) recommending the use of the PEF or PEFCR, and
- (2) presuming that requirements for substantiation are met when using PEFCR.

PEF is an incomplete tool for substantiation. We appreciate the Council recognising some of the shortcomings of the PEF method in recital 32. However, we are concerned about the Council's decision to recommend the incorporation of PEF in recitals 17, 24 and 32 as a tool for substantiating claims. The current PEF and subsequent Category Rules are incomplete and risk misguiding well-intended consumers and becoming a greenwashing tool that the legislation is aiming to avoid. The PEFCR for apparel and footwear, for example, considerably downplay the benefits of using renewable, biodegradable materials like natural fibres and score fossil-fuel based materials like polyester better. The reason for this being fundamental flaws in the PEF methodology that need to be improved.

The PEF may be a valid methodology when applied to manufactured products, however it gives inaccurate results when it is applied to food and agricultural products, where the most intensively-produced product, the most environmentally friendly it tends to be according to PEF. It subsequently disregards the benefits of extensive and sustainable methods of production. For natural fibres, this is exacerbated even further by the PEFCR for apparel and footwear which assumes that the most durable products will have the longest life, despite the fact that clothing made from fibres with the lowest physical strength have the longest life in our wardrobes.

RESPONSES TO EU CONSULTATION

As and when the EU calls for feedback on relevant EU legislation, MTLC drafts and disseminates responses to the below public consultations to support Coalition members and their networks to respond.

2022	2023	2024
<ul style="list-style-type: none"> • 1st PEFCR Public Consultation • Ecodesign Requirements • Consumers Green Transition • Microplastics Pollution 	<ul style="list-style-type: none"> • ESPR Product Categories • Textile Labelling Regulation • Waste Framework Directive (Consultation and Amendments) • Green Claims Directive (Amendments) 	<ul style="list-style-type: none"> • 2nd PEFCR Public Consultation • ESPR JRC Preparatory Study • Bio-based Textiles • Ecobalyse • Green Claims Council Position • JRC End of Waste criteria for textile waste

The screenshot shows the public consultation page for 'New product priorities for Ecodesign for Sustainable Products'. The page includes a navigation bar with the European Commission logo, a search bar, and a 'Log in' button. The main content area features a timeline on the left with stages: 'In preparation', 'Call for evidence', 'Public consultation', and 'Commission adoption'. The 'Public consultation' stage is highlighted with a 'FEEDBACK: CLOSED' button and an 'UPCOMING' label. The 'About this initiative' section provides a summary of the Commission's proposal and details about the consultation period (31 January 2023 - 12 May 2023) and the topic (Environment).

The screenshot shows the public consultation page for 'Textile labelling rules (revision)'. The page includes a navigation bar with the European Commission logo, a search bar, and a 'Log in' button. The main content area features a 'PAGE CONTENTS' section with links to 'About this consultation', 'Target audience', 'Why we are consulting', 'Responding to the questionnaire', 'Consultation outcome', and 'Contact'. The 'About this consultation' section provides details about the consultation period (19 December 2023 - 15 April 2024) and the topic (Single market). The 'Target audience' section lists stakeholders and citizens, and the 'Why we are consulting' section explains the purpose of the consultation.

SIX-MONTH OUTLOOK

Brussels dynamics and the need to keep campaign momentum:

PEFCR fundamentally flawed, questionable governance of Technical Secretariat

Over 60% of MEPs are newcomers following EU election

Some Member States are in favor of PEF

New Rapporteurs on Parliament Committees responsible for Green Claims and Waste Framework Directive

Secondary legislation- “Delegated Acts” - require more technical expertise and engagement

Increased lobbying by Fast Fashion

Climate policies losing momentum

Hungary holds EU presidency between July – December 2024

Textile Labelling Regulation

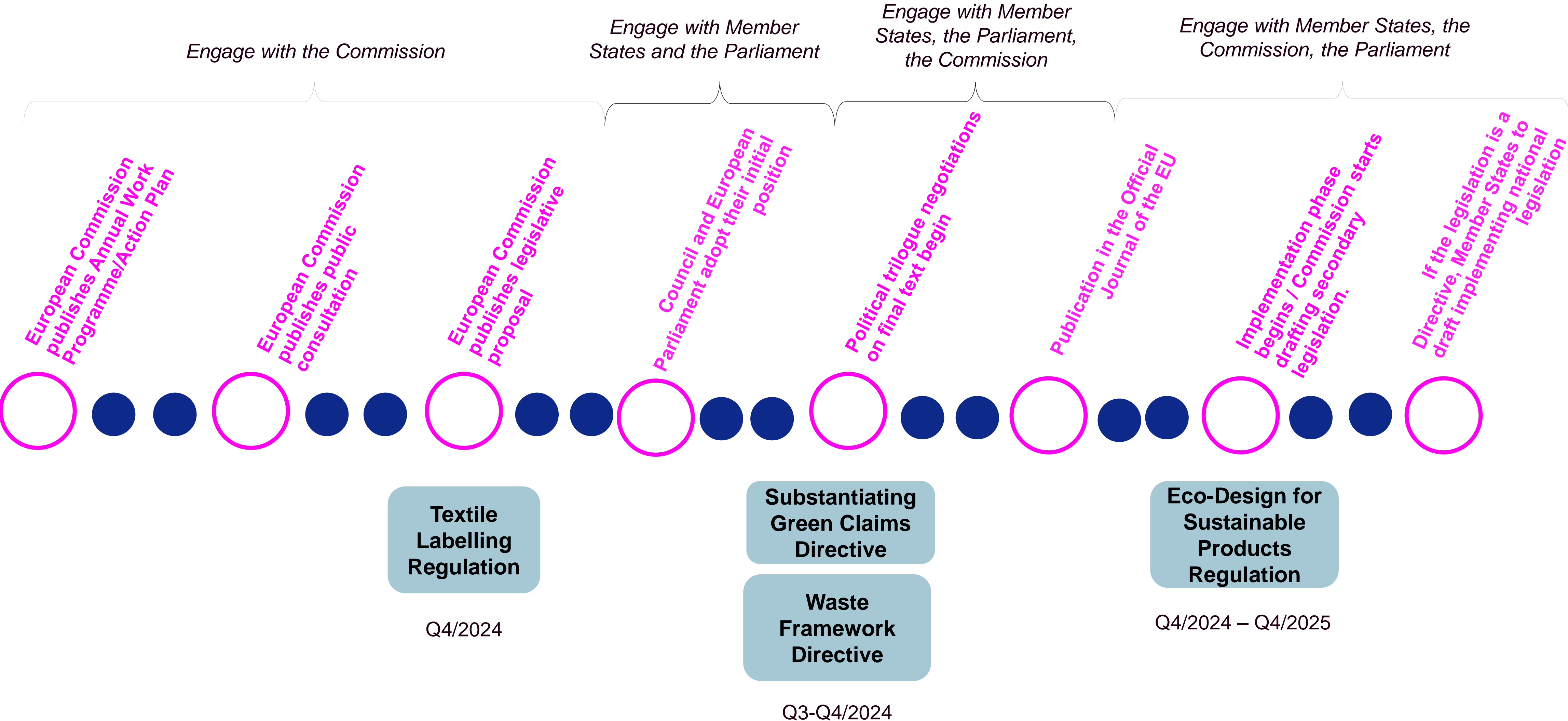
Waste Framework Directive

Substantiating Green Claims Directive

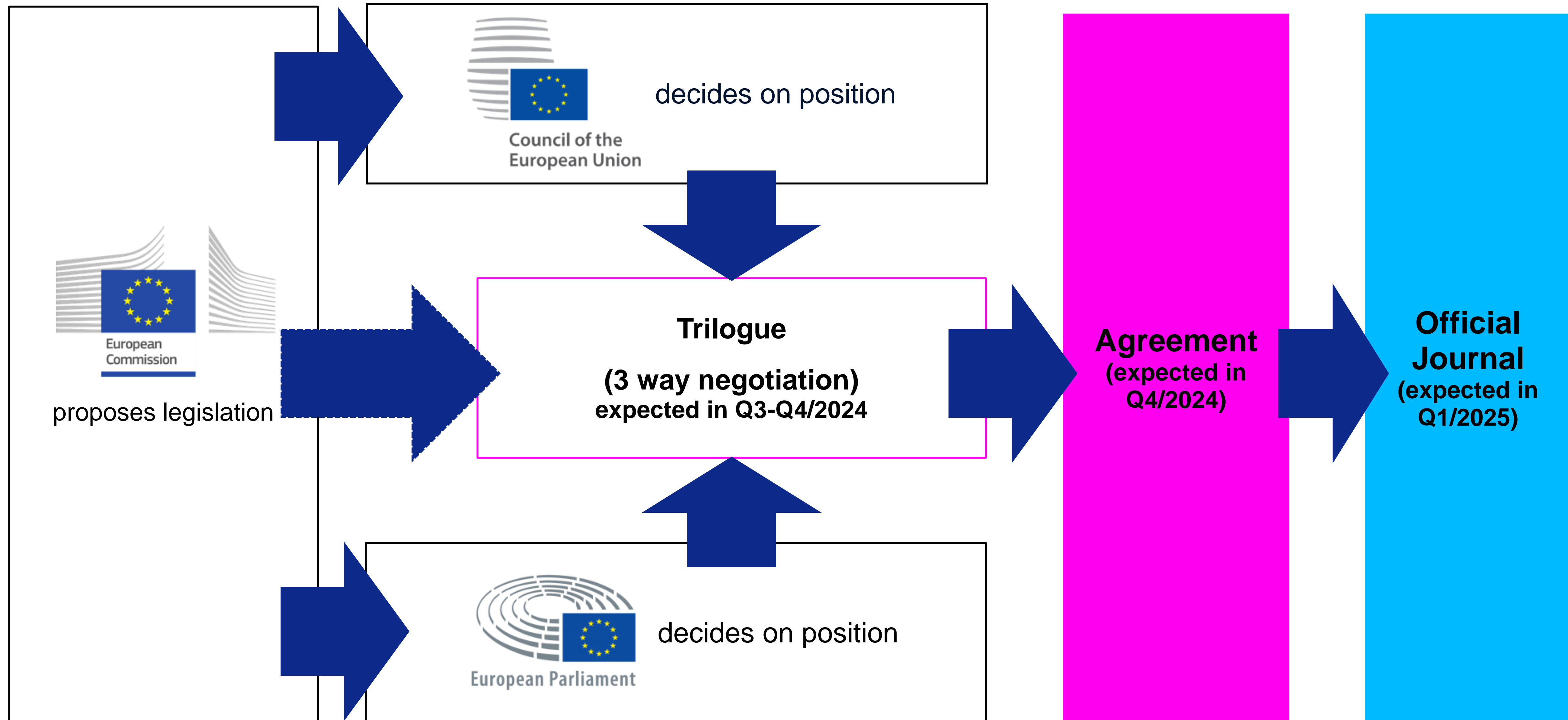
Eco-Design for Sustainable Products Regulation

<p>MTLC Goal</p>	<ul style="list-style-type: none"> • Avoid the inclusion of PEF • Introduce a microplastic warning and year of production to labels 	<ul style="list-style-type: none"> • Develop an EPR scheme that applies fees based on the quantity of garments found in waste streams based on data collection such as duration of service. 	<ul style="list-style-type: none"> • Maintain originally proposed provisions to allow for any scientifically-based methods to be used as the baseline for substantiation and verification, rather than the PEF method alone. 	<ul style="list-style-type: none"> • Avoid the use of the PEFCR method as the baseline foundation for any requirements within the delegated act for the product category textiles.
<p>Target audiences</p>	<p>Commission</p>	<p>MEPs, Council Attachés, Commission</p>	<p>MEPs, Council Attachés, Commission</p>	<p>Commission, Joint Research Center</p>
<p>Actions</p>	<ul style="list-style-type: none"> • Participate in webinars and public consultations • Draft position statement • Arrange one-on-one meetings with Commission 	<ul style="list-style-type: none"> • Monitor • Publish position paper • Arrange one-on-one meetings with Committee members 	<ul style="list-style-type: none"> • Monitor • Publish position paper • Arrange one-on-one meetings with Committee members 	<ul style="list-style-type: none"> • Provide expertise to Ecodesign Forum • Monitor • Publish position paper
<p>Urgency - Risk</p>	<p>medium - high</p>	<p>medium</p>	<p>high</p>	<p>high</p>

ENGAGEMENT PROCESS – 2024 - 2025



LEGISLATIVE PROCESS FOR WASTE FRAMEWORK AND GREEN CLAIMS



POLICY MILESTONES AND MTLC ACTIVITY



Key institutional milestones

Q2-Q4 2024
Commission reviews consultation responses and works on draft proposal to the revision of the Textile Labelling Regulation

Q3 2024 – Q1 2025
Green Claims and Waste Framework Directive trilogue discussions

Q4
Expected publication of revision of Textile Labelling Regulation

Q1 2025
PEFCR for apparel and footwear expected approval and publication

Ongoing 2025
Ongoing work on EU Ecolabel and the ecodesign requirements

MTLC Activity

July-August 2024
Monitoring of new formation of European Parliament and map new MEP targets and Committee members

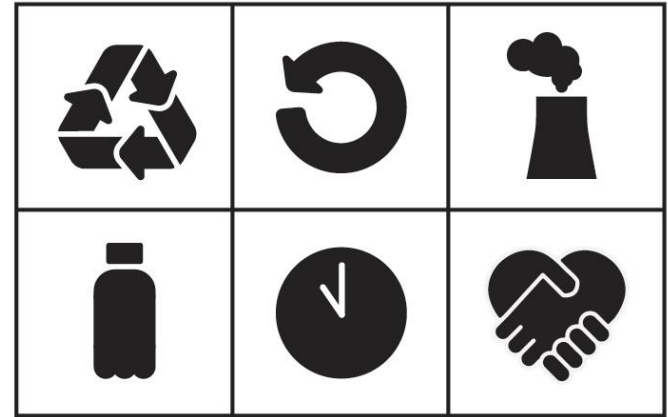
September – December 2024
Continue engagement with Commission officials to ensure successful trilogue discussions and lay the groundwork for discussions on Delegated Acts for Green Claims and Waste Framework
Engage with targeted MEPs and Member States attaches on trilogue discussions of Green Claims and Waste Framework

Q4 2024
Track developments of the Textile Labelling Regulation and track any other relevant Commission moves

Ongoing 2025
Engage with Commission developing ecodesign delegated acts and review of Textile Labelling Regulation
Engage with Rapporteurs, Shadow Rapporteurs and Member States Representatives as well as Commission on the Textiles Labelling Regulation to ensure successful trilogue

NEXT STEPS

- Support of the campaign – joining as coalition members
- Support in financing the campaign for the next 12 months
- Contact points for further engagement



MAKE THE LABEL COUNT