

Make the Label Count

Campaign Milestones and Contributions

MTLC Highlights: Year 1

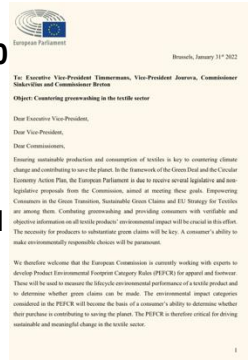
OCTOBER 2021

Brunswick and AWI organised the **MTLC hybrid launch event** together with DG ENV Deputy Head of Unit, Paola Migliorini.



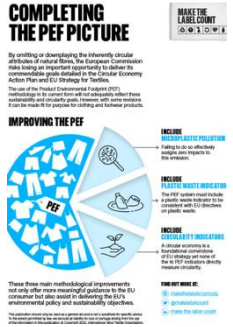
JANUARY 2022

MTLC supported the development of **a letter by 30 MEPs** calling on the European Commission to ensure that green claims made by the textiles industry are "complete, science based and non-discriminatory." It was retweeted by several MEPs (e.g. MEP Vautmans, MEP Calenda etc.)



JULY 2022

MTLC published an **infographic** on the shortcomings of the PEF methodology with recommendations on how to improve it.



MTLC appeared in **an article by The Guardian**, with spokesperson Dalena White raising the key issues around the PEF methodology. Read it here.

OCTOBER 2021

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Make the Label Count campaign says system due to come into force in 2023 is misleading and outdated

During a roundtable discussion at the **2021 POLITICO Sustainable Summit**, DG ENV Head of Unit Emmanuelle Maire was asked whether she's familiar with MTLC's concerns on environmental labelling and how the Commission will ensure the current practice doesn't lead to greenwashing. Maire responded by saying that she's aware of the campaign and our positions.

DECEMBER 2021



Brunswick and MTLC drafted and **submitted feedback on the EC's public consultation** on the Empowering Consumers for the Green Transition Directive.

MAY 2022

MTLC published a White Paper addressing concerns with the current PEF methodology and **providing recommendations** on how to offer more meaningful guidance to EU consumers but also assist in delivering the EU's environmental policy and sustainability objectives.

JUNE 2022



September 2021 – July 2022

MTLC Highlights: Year 2

OCTOBER 2022

MTLC organised **two farm visits with EU Parliament staff** to The Knitwit Stable, a Merino wool and Mohair farm in the Netherlands to show them first-hand **how natural fibres become garments** and the benefits the industry brings to the circular economy.



H2 2022 – Q1 2023

Ahead of the publication of the Green Claims Directive proposal, MTLC engaged with EU lawmakers and built relationships with third-party stakeholders to make its case.

March 2023

After an 18-month delay and sustained advocacy efforts by MTLC and others, the European Commission published its proposal for the Green Claims Directive **without reference to the PEF methodology** and recognised that further improvements are needed on the PEFCR.

MTLC **sent a letter to the President and Members of the European Commission** urging them to ensure that the PEF includes the necessary indicators to address the most critical environmental impacts of the fashion industry.

OCTOBER 2022



Subject: Ensuring EU textile legislation does not licence greenwashing

Dear President and Members of the European Commission,

The fashion and textiles industry must urgently reform if it is to mitigate its negative impact on people and the planet. We, the undersigned signatories of the Make the Label Count campaign, applaud the European Commission's ambitious proposals for sustainable textiles under the EU Green Deal and support the EU on its journey to become climate neutral and circular by 2050. However, if not done properly, EU textile legislation could give licence to greenwashing.

Ensuring that consumers can easily access reliable information about a garment's environmental impact and make responsible purchasing choices is key to driving the necessary changes in the textiles sector. In an industry flooded with greenwashing, facilitated by brand-dominated and self-governed definitions of 'sustainability', the need for regulation and harmonised sustainability language for consumers has never been more important.

This was signalled by consumer authorities in both the Netherlands and Norway when they issued joint guidance[1] on the use of the Higg Material Sustainability Index (MSI) tool to communicate product sustainability, stating that environmental claims based on the Higg MSI methodology need to be revised to mitigate the risk of misleading consumers.

These guidelines are based on the interpretation of current EU consumer law and confirm the shortcomings of current life cycle assessment-based methods used to quantify the environmental impacts of textile products. The two authorities send a timely and important message to the fashion industry and governments - environmental claims need to be accurate if they are to empower consumers to make well-informed and truly impactful purchasing decisions.

Therefore, we commend the European Commission's decision to regulate ecodesign requirements and the substantiation of green claims made by companies. If done right, this will be a game-changing and fair sustainability framework that can serve as an educational tool for the public, as well as an influential example of best practice for governments across the world. If done wrong, this will simply give the industry a licence to greenwash with catastrophic results.

The Commission maintains that a sustainable textile industry can only be the result of a combination of existing and upcoming policies. However, we ask for greater clarity from the Commission as to the interplay between these various policy initiatives and the tools which will deliver them. While the Commission is yet to confirm the tools it intends to deploy to underpin the assessment of claims, recent communications indicate that the Product Environmental Footprint (PEF) will be the primary tool used[2].

MTLC published an op-ed in Politico, with MTLC spokesperson Dalena White raising the **key issues around the PEF and how to fix it**.

NOVEMBER 2022



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.

VIA Getty Images/Make the Label Count

BY DALENA WHITE, SPOKESPERSON, MAKE THE LABEL COUNT

NOVEMBER 8, 2022 | 5:00 AM CET

Brunswick **drafted and tabled MTLC's amendments** to the Ecodesign for Sustainable Products Regulation (ESPR) and the EU Textiles Strategy.

DECEMBER 2022

Brunswick connected the FT with spokesperson Dalena White for a quote in an article "Can fast fashion kick its dirty habits?".

AUGUST 2023

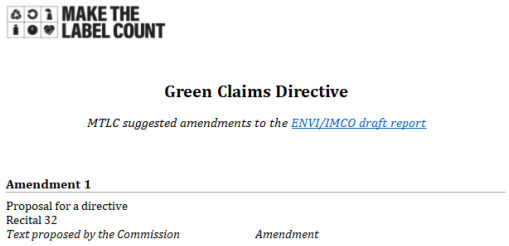
But the index has been criticised by NGOs for being too heavily skewed by industry interests and not robust enough, which it has since pledged to address. Other measures including Life Cycle Assessment and Product Environmental Footprint, both designed to calculate the effects a product has on the environment from creation to disposal, have also been accused of falling short.

"The reason [such methodologies] are falling down is because we are taking materials from nature, from a farm, and putting them in a mix with materials of a very different origin" such as oil-based polyesters, says Dalena White, secretary-general of the International Wool Textile Organisation. "We are making natural fibres much higher in terms of [environmental] footprint because we never measure where the oil comes from."

September 2022 – July 2023

MTLC Highlights: Year 3

NOVEMBER 2023
Brunswick **drafted and tabled MTLC's amendments** on the Green Claims Directive ahead of the European Parliament Committee vote in February.


MAKE THE LABEL COUNT

Green Claims Directive

MTLC suggested amendments to the ENVI/IMCO draft report

Amendment 1

Proposal for a directive
Recital 32
Text proposed by the Commission *Amendment*

Brunswick **intensified engagement** with key lawmakers on the Green Claims and the Waste Framework Directives.
Q3-Q4 2023

Brunswick **drafted and tabled MTLC's amendments** on the Waste Framework Directive ahead of the European Parliament Committee vote in February.
JANUARY 2024


MAKE THE LABEL COUNT

Waste Framework Directive

MTLC suggested amendments to the ENVI draft report

Amendment 1

Proposal for a directive
Recital 18 a
Text proposed by the Commission *Amendment*

MARCH-APRIL 2024
Brunswick and MTLC drafted and **submitted a response to the EC's public consultation** on the evaluation of the Textile Labelling Regulation.

Brunswick and MTLC drafted and **submitted a response to the EC's public consultation** on the Green Claims Directive.
APRIL-MAY 2024

APRIL 2024
Brunswick and MTLC drafted and **submitted a response to the EC's second public consultation** on the PEF category rules for apparel and footwear.

MTLC was **featured in an article from Vogue Business**, addressing the key issues of the PEF methodology, notably the omission of the negative impacts of synthetic fibres.
JUNE 2024

JULY 2024
Brunswick and MTLC drafted and submitted a response to the EC's fitness check on the "Polluter Pays Principle", ensuring polluters bear the cost of measures preventing and mitigating pollution.

VOGUE BUSINESS

favouring synthetics through the use of flawed and even biased data. The International Wool Textile Organisation (a former voting member in the development of PEFCRs) is among bodies to have publicly called the PEF methodology into question over recent years. It backed a report published by the Make the Label Count campaign, claiming that multiple negative impacts of synthetics (microplastic pollution, environmental impact of fossil fuels, etc) and positive impacts of natural fibres (renewability, biodegradability, financial opportunity for rural communities, etc) are being overlooked.

September 2023 – July 2024

MTLC Highlights: Year 4

Brunswick **intensified outreach efforts** to MEPs and Member State representatives, mostly to discuss and raise concerns about the Green Claims Directive and the PEF methodology.

Q4 2024

JAN-FEB 2025

Brunswick activated a second round of outreach to Council representatives specifically on the Green Claims Directive.

Brunswick activated a round of outreach to Council representatives from **14 Member States** through coalition members at national level, which resulted in meetings and direct engagement between campaign members and national representatives.

FEBRUARY 2025

MARCH 2025

Ahead of the Parliament event, Brunswick supported MTLC in drafting an **open letter and a petition** calling on EU lawmakers to recognize the benefits on natural fibres in sustainability. The petition was signed by more than 3000 people.



MAKE THE LABEL COUNT

Brussels, Belgium 16 May 2025

Subject: Protect Nature from Fast Fashion

Dear Commissioner Roswall,
Dear Commissioner Hansen,

We, the below signatories, are writing to urge you to ensure that EU textile legislation does not allow greenwashing or unfairly disadvantage natural fibres.

The European Union has made ambitious progress in recent years to address the harmful environmental impact of textile production and consumption. The fashion industry is flooded with greenwashing, facilitated by brand-dominated and self-governed definitions of 'sustainability' and must urgently change its practices if it is to mitigate its negative impact on people and the planet.

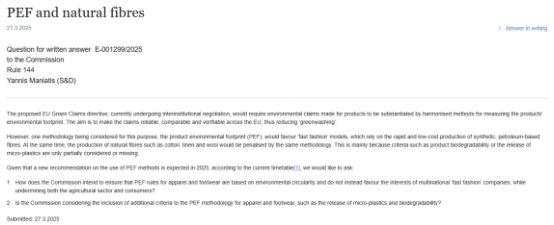
European lawmakers have been right to recognise the need for science-based methodologies to underpin this reform, and we welcome the European Commission's decision to develop a new recommendation on Environmental Footprint (EF) Methods.

As you set out to review the EF methods, we urge you to recognise and appropriately weigh the inherently circular benefits of natural fibres. Offering **biodegradability, renewability**, and several centuries of commercially viable **recyclability**, only natural fibres are sustainable in the long term. These attributes, and in particular the return of nutrients to the soil for use again, provide a key solution to many of today's pressing environmental challenges at a time when we must reduce waste, increase soil health, combat microplastic pollution, and move away from fossil fuel dependence.

Responsibly managed, natural fibre production actively restores ecosystems by enhancing soil health, increasing biodiversity, and countering climate change through sequestration of atmospheric carbon – contributing to a regenerative approach rather than a destructive one. These **positive environmental impacts** must be accounted for in the upcoming review of the Environmental Footprint (EF) methods to ensure a fair and comprehensive assessment of textile sustainability.

Following successful engagement from an MTLC coalition member, two Greek MEPs submitted **parliamentary questions** on how the EC plans to ensure that natural fibres are not disadvantaged through the PEF methodology.

APRIL 2025



PEF and natural fibres

27.3.2025 > Answer in writing

Question for written answer E-001299/2025
to the Commission
Rule 144
Yannis Maniatis (S&D)

The proposed EU Green Claims directive, currently undergoing interinstitutional negotiation, would require environmental claims made for products to be substantiated by harmonised methods for measuring the products' environmental footprint. The aim is to make the claims reliable, comparable and verifiable across the EU, thus reducing 'greenwashing'.

However, one methodology being considered for this purpose, the product environmental footprint (PEF), would favour 'fast fashion' models, which rely on the rapid and low-cost production of synthetic, petroleum-based fibres. At the same time, the production of natural fibres such as cotton, linen and wool would be penalised by the same methodology. This is mainly because criteria such as product biodegradability or the release of micro-plastics are only partially considered or missing.

Given that a new recommendation on the use of PEF methods is expected in 2025, according to the current timetable[1], we would like to ask:

1. How does the Commission intend to ensure that PEF rules for apparel and footwear are based on environmental circularity and do not instead favour the interests of multinational 'fast fashion' companies, while undermining both the agricultural sector and consumers?
2. Is the Commission considering the inclusion of additional criteria to the PEF methodology for apparel and footwear, such as the release of micro-plastics and biodegradability?

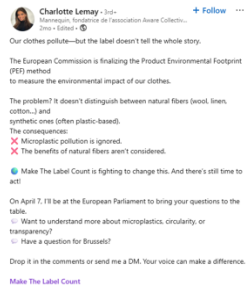
Submitted: 27.3.2025

APRIL 2025

Brunswick and MTLC organized a **roundtable event in the European Parliament** hosted by MEP Daniel Buda and moderated by MTLC spokesperson Dalena White. The panel discussed the benefits of natural fibres to the environment and biodiversity, and how to ensure they are fairly treated under EU textile legislation.



Influencer Charlotte Lemay joined the roundtable to represent the consumer voice, and helped amplify the reach of the event on social media.



Charlotte Lemay · 3rd+ + Follow
Mannequin, fondatrice de l'association Aware Collectiv...
2mo • Edited •

Our clothes pollute—but the label doesn't tell the whole story.

The European Commission is finalizing the Product Environmental Footprint (PEF) method
to measure the environmental impact of our clothes.

The problem? It doesn't distinguish between natural fibers (wool, linen, cotton...) and
synthetic ones (often plastic-based).
The consequences:
❌ Microplastic pollution is ignored.
❌ The benefits of natural fibers aren't considered.

🌍 Make The Label Count is fighting to change this. And there's still time to act!

On April 7, I'll be at the European Parliament to bring your questions to the table.
💬 Want to understand more about microplastics, circularity, or transparency?
💬 Have a question for Brussels?

Drop it in the comments or send me a DM. Your voice can make a difference.

Make The Label Count

Brunswick and MTLC drafted and submitted a response to the EC's call for evidence on the new EU Bioeconomy Strategy.

JUNE 2025

MTLC has been invited to participate in a stakeholder workshop on "Co-products of animal farming: allocation approach in Environmental Footprint methods" by the EC.

JUNE 2025

September 2024 – July 2025

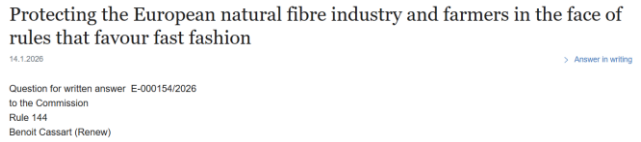
MTLC Highlights: Year 5

OCTOBER 2025

Brunswick supported IWTO in securing a spot as a **Member of the Ecodesign Forum**, the advisory body supporting the EC in the implementation of the ESPR.

OCTOBER 2025

Brunswick and MTLC drafted and submitted a response to the EC's call for evidence on the Circular Economy Act.



Protecting the European natural fibre industry and farmers in the face of rules that favour fast fashion

14.1.2026 > Answer in writing

Question for written answer E-000154/2026
to the Commission
Rule 144
Benoit Cassart (Renew)

JANUARY 2026

Following engagement with MEP Benoit Cassart, the MEP submitted a **parliamentary question** on the measures the EC plans to take to strengthen European production of natural fibres and protect farmers.

NOV-DEC 2025

Brunswick activated a round of outreach to MEPs that are members of the Sustainable Livestock Intergroup in the European Parliament, to discuss the benefits of livestock and their by-products to biodiversity.

FEB-MAR 2026

Brunswick supported MTLC in the drafting and submission of its response to a survey and accompanying questionnaire to the JRC's work on the 3rd milestone of the Preparatory Study for Textile Products under the ESPR.

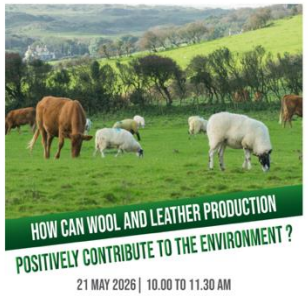
APRIL 2026

Following successful engagement by MTLC member with the TAB, the EC is now considering a **microplastics-related impact category** in the ongoing revision of the EF methods.

JAN-MAY 2026

Following significant engagement and coordination efforts with MEP Benoit Cassart's office, the European Livestock Voice (ELV), COTANCE and Copa Cogeca, IWTO successfully secured a speaking opportunity and the **Sustainable Livestock Intergroup Session** in the European Parliament in May to discuss the environmental benefits of wool and leather.

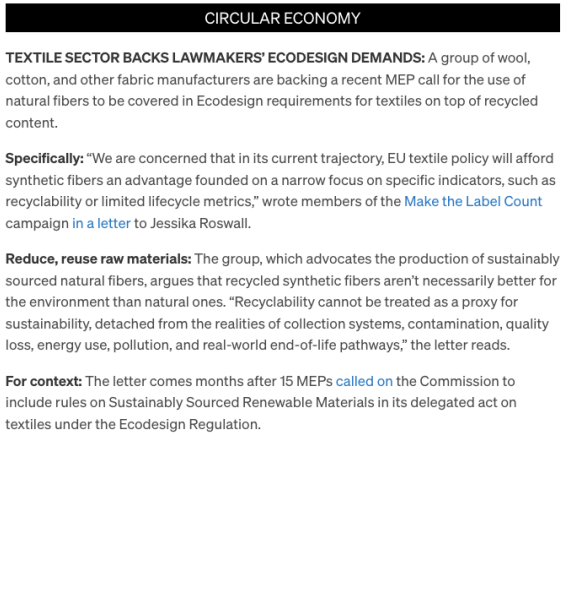
An accompanying **call to action**, drafted by MTLC, was co-signed by the three MEP Co-Chairs of the Intergroup and shared with the European Commission.





JUNE 2026

Brunswick supported MTLC in setting up a working group and drafting a letter on the recognition of sustainably sourced renewable materials (SSRM) addressed to the European Commission. The letter was covered in POLITICO's daily sustainability newsletter.



CIRCULAR ECONOMY

TEXTILE SECTOR BACKS LAWMAKERS' ECODESIGN DEMANDS: A group of wool, cotton, and other fabric manufacturers are backing a recent MEP call for the use of natural fibers to be covered in Ecodesign requirements for textiles on top of recycled content.

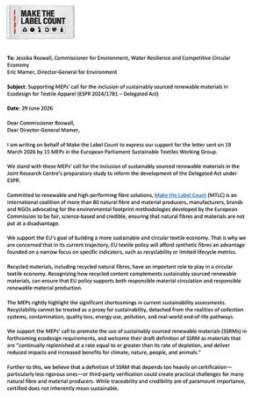
Specifically: "We are concerned that in its current trajectory, EU textile policy will afford synthetic fibers an advantage founded on a narrow focus on specific indicators, such as recyclability or limited lifecycle metrics," wrote members of the Make the Label Count campaign in a letter to Jessika Roswall.

Reduce, reuse raw materials: The group, which advocates the production of sustainably sourced natural fibers, argues that recycled synthetic fibers aren't necessarily better for the environment than natural ones. "Recyclability cannot be treated as a proxy for sustainability, detached from the realities of collection systems, contamination, quality loss, energy use, pollution, and real-world end-of-life pathways," the letter reads.

For context: The letter comes months after 15 MEPs called on the Commission to include rules on Sustainably Sourced Renewable Materials in its delegated act on textiles under the Ecodesign Regulation.

September 2025 – July 2026

MTLC Highlights: Year 6



To: Jessika Roswall, Commissioner for Environment, Water Resilience and Competitive Circular Economy
Eric Mamer, Director-General for Environment

Subject: Supporting MEPs' call for the inclusion of sustainably sourced renewable materials in Ecodesign for Textile Apparel (ESPR 2024/1781 – Delegated Act)

Date: 29 June 2026

Dear Commissioner Roswall,
Dear Director-General Mamer,

I am writing on behalf of Make the Label Count to express our support for the letter sent on 19 March 2026 by 15 MEPs in the European Parliament Sustainable Textiles Working Group.

We stand with these MEPs' call for the inclusion of sustainably sourced renewable materials in the Joint Research Centre's preparatory study to inform the development of the Delegated Act under ESPR.

Committed to renewable and high-performing fibre solutions, Make the Label Count (MTLC) is an international coalition of more than 80 natural fibre and material producers, manufacturers, brands and NGOs advocating for the environmental footprint methodologies developed by the European Commission to be fair, science-based and credible, ensuring that natural fibres and materials are not put at a disadvantage.

We support the EU's goal of building a more sustainable and circular textile economy. That is why we are concerned that in its current trajectory, EU textile policy will afford synthetic fibres an advantage founded on a narrow focus on specific indicators, such as recyclability or limited lifecycle metrics.

Recycled materials, including recycled natural fibres, have an important role to play in a circular textile economy. Recognising how recycled content complements sustainably sourced renewable materials, can ensure that EU policy supports both responsible material circulation and responsible renewable material production.

The MEPs rightly highlight the significant shortcomings in current sustainability assessments. Recyclability cannot be treated as a proxy for sustainability, detached from the realities of collection systems, contamination, quality loss, energy use, pollution, and real-world end-of-life pathways.

We support the MEPs' call to promote the use of sustainably sourced renewable materials (SSRMs) in forthcoming ecodesign requirements, and welcome their draft definition of SSRM as materials that are "continually replenished at a rate equal to or greater than its rate of depletion, and deliver reduced impacts and increased benefits for climate, nature, people, and animals."

Further to this, we believe that a definition of SSRM that depends too heavily on certification—particularly less rigorous ones—or third-party verification could create practical challenges for many natural fibre and material producers. While traceability and credibility are of paramount importance, certified does not inherently mean sustainable.

SEPTEMBER 2026

Following the letter sent to Environment Commissioner Roswall in June, Brunswick and MTLC met with her cabinet to discuss the inclusion of SSRM in forthcoming policy.

OCTOBER 2026

Brunswick and MTLC met with MEP Michael McNamara and MEP Rasmus Nordqvist's office to respectively introduce the campaign and discuss latest policy developments.

NOV-DEC 2026

Brunswick is supporting MTLC in preparing a submission to a JRC survey on classes of performance under the ESPR *(ongoing)*.

Brunswick supported MTLC in kicking off a working group on microplastics advocacy.

SEPTEMBER 2026

MTLC met and spoke at a session on the sides of the Wool March in Brussels, which was attended by EU lawmakers and farmers.

OCTOBER 2026



September 2026 – July 2027