

Navigating global textile regulations and compliance

All your webinar questions answered.

Q: What are your thoughts on manufacturers saying “Made in the USA with globally sourced ingredients”?

It’s important to follow the 2021 “Made in the USA” rule, which states that:

- Final assembly or processing of the product to occur in the US
- All significant processing that goes into the product to occur in the US
- All or virtually all ingredients or components of the product to be made and sourced in the US

Depending upon your supply chain, you may be able to make a “qualified” Made in the USA claim, such as “Made in USA of US and imported parts” or “60% US content.”

For more: [FTC guidance on Made in the USA](#)

Q: Is the definition of ‘textile’ anything composed of at least 80% fibers? Would this exclude hard-case luggage, and include backpacks?

The 80% rule you’re referring to is likely based on the EU’s Textile Labelling Regulation (EU) 1007/2011, which requires fiber identity disclosures for products containing at least 80% by weight of textile fibers – this includes raw, semi-worked, worked, semi-manufactured, semi-made and made-up products.

For more: [EU Regulation \(EU\) No 1007/2011](#)

However, definitions vary by jurisdiction. For instance, in the US, fiber identity is required for clothing and textile products commonly used in a household, as per the Textile Act and its Regulations. This excludes textiles used in handbags or luggage. It also excludes knapsacks and backpacks, and bags, such as net bags, tote bags, bags for laundry, diapers, cosmetics, sports gear, etc.

For more: [FTC guidance on labeling requirements](#)

Q: Do you have any information regarding the control of PFAS or other substances in the recycled products market?

We’re actively monitoring how jurisdictions are addressing PFAS in recycled materials. Here’s a quick look at current developments:

- [Denmark](#) has set a limit of 50 mg/kg of total fluorine for textiles starting 1 July 2026, with a sell-through grace period until 1 July 2027

- California introduced a total organic fluorine (TOF) limit of 100 ppm starting 1 January 2025, which will drop to 50 ppm in 2027

Industry associations like the [American Apparel & Footwear Association \(AAFA\)](#) are actively coordinating compliance discussions. See, for example, its May 2025 comments to [Minnesota's Pollution Control Agency \(MCPA\)](#).

Q: What about skin sensitizing in textiles? I heard there was a draft restriction in the EU.

Skin sensitizing substances in textiles are under increasing scrutiny in the EU, with draft REACH restrictions focused on consumer protection. You're likely referencing a [2018 restriction dossier](#), initiated by France and Sweden, which targets skin-sensitizing substances in textiles, leather, hide and fur articles.

As of July 2025, the RAC and SEAC have both published opinions on the proposal; however, no legislative or regulatory activity has occurred to date. See more: [EU industry coalition backs three-year deferral period for 'newly classified' skin sensitizers](#).

In response to growing concerns and regulatory scrutiny, some brands are also evaluating potential implications for workers during manufacturing. [Chemical Hazard Assessments](#) (CHAs) are a well-established tool to identify potential skin sensitization early during product development.

Q: Regarding EPR, will the cost be shared by the garment manufacturer?

Yes. The Extended Producer Responsibility (EPR) policies described in our webinar operate on the "producer pays" principle. These require manufacturers to:

- Register and report the amount of textiles placed on the market in a given jurisdiction
- "Take back" a percentage of waste textiles each year, for recycling or disposal

For more: [See France's textiles EPR approach](#), which is one of the most mature globally.

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