

Brussels, 13 October 2025

Statement:

Call for an ECHA sector-specific evaluation of technical textiles in the UPFAS restriction process

This summer, ECHA announced that eight new sectors have been assessed by the Dossier Submitter and incorporated into the Background Document. ECHA has also confirmed that RAC & SEAC will not carry out a sector-specific evaluation of these eight sectors, although they will be covered in the RAC opinion and SEAC draft opinion, and later in the restriction proposal.

EURATEX, representing European textile and clothing industry, covering both TULAC and technical textiles¹, understands that the ECHA Committees' single evaluation of the eight sectors would extend the process beyond 2026. Nevertheless, EURATEX strongly urges a dedicated assessment of technical textiles by ECHA in line with the process applied for the other 14 sectors. The evaluation of "horizontal issues" alone is not enough to address the most important aspects of technical textiles and cannot provide the basis for a workable and proportionate regulation.

EURATEX urges ECHA to take into consideration the complexity of the procedure and to address it in a way that recognizes the essential role of every sector. Clear definitions are needed more than ever to allow all actors in the value chain to comply with legislation taking into account restrictions, thresholds and testing methods. If sectors are not thoroughly evaluated as foreseen in the REACH restriction process, they should not be included in the restriction scope. Otherwise, for SMEs, subcontractors and district-based supply chains, which often lack in-house R&D and compliance structures, any restriction should be accompanied by tailored guidance, transitional support measures and realistic implementation timelines to avoid disproportionate impacts across the value chain.

In its draft proposal, the Dossier Submitter has already recognised several categories of technical textiles, including outdoor textiles, architectural membranes, filtration and separation media, removable covers for industrial equipment, medical applications, and transport textiles. While this step is welcome, the annex below shows that many other critical applications remain unaddressed, such as construction, geotextiles, environmental and energy uses, or safety-related electronics. Without a comprehensive sector-specific assessment, these uses risk being overlooked, resulting in disproportionate restrictions or unworkable derogation schemes.

¹ [Opinion of the European Economic and Social Committee \(2013\)](#): Technical textiles are defined as **textiles fibres, materials and support materials meeting technical rather than aesthetic criteria**, even if, for certain markets like workwear or sports equipment, both types of criteria are met. Technical textiles bring a functional answer to a wide range of specific requirements: lightness, resistance, reinforcement, filtration, fire-retardancy, conductivity, insulation, flexibility, absorption and so on.

ECHA also needs to recognize that some PFAS are and will remain essential in numerous technical applications, as no adequate alternatives exist to meet strict safety and performance standards. The responsible use of PFAS in technical textiles must remain possible, otherwise Europe risks dependence on imports and the loss of industry capacity and jobs in the sector. What is needed is not blanket bans, but targeted, technical solutions to prevent emissions throughout the product life cycle.

Imposing a broad PFAS ban with numerous derogations will create legal uncertainty as well as disproportionate administrative burdens making implementation even more difficult for the industry. Targeted restrictions are needed to address the specificity of each use of PFAS and clear definitions are necessary for each sector.

Therefore, EURATEX calls on ECHA and the European Commission to:

- **Conduct a sector-specific assessment of technical textiles, equivalent in depth to the 14 sectors already evaluated.**
- **Clarify the boundary with TULAC and explicitly exclude PPE and medical applications from the “technical textiles” sector to prevent double counting.**
- **Expand the sector classification to include the missing sub-sectors illustrated in the annex below, ensuring an evidence-based analysis of uses, emissions and (lack of) alternatives.**
- **If such an assessment cannot be completed in time, refrain from including technical textiles in the restriction scope until a full evaluation is carried out or a clear roadmap is provided.**

EURATEX is fully committed to actively and constructively engage in the process and stands ready to provide detailed data and examples to support a proportionate evaluation of technical textiles. We count on ECHA and the European Commission to ensure that the final proposal reflects a sound approach recognizing the necessity of PFAS in technical textiles and building on definitions already widely used in the textile sector.

Annex

The sector of technical textiles in the EU



Textiles for environmental protection and renewable energy generation:
 e. g., special fabrics for fuel cells, permanently resistant soil liners for landfills, textiles for bio-gas plants



Textiles used for medical purposes:
 e. g., plaster patches, dressing material, infection defence equipment that is not subject to the EU Medical Device Regulation (MDR)



Security and defence textiles:
 (e.g. materials and components for military and law-enforcement applications)



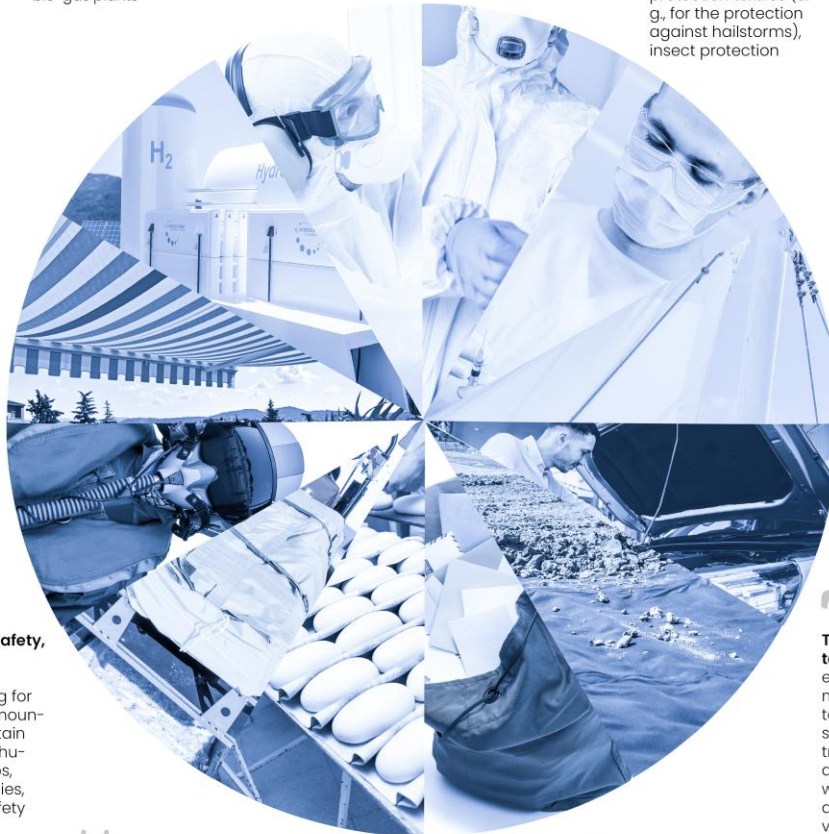
Textiles for agriculture, horticulture, and forestry:
 e. g., textile veterinary protection products (protection against epidemics), extremely weather-resistant protection textiles (e. g., for the protection against hailstorms), insect protection



Textile building, interior technology, and upholstery:
 e. g., long-lasting, resource-saving, and extremely weather-resistant textiles to protect from heat, climate effects, and solar radiation, sun-blind, special fabrics required in accordance with building legislation, fire protection blinds



Architectural and construction textiles:
 e. g., high-performance textiles for resource-efficient lightweight construction, textile cooling of buildings (sun protection), façade textiles that are repellent to environmental media, textile membranes for surface structures, safety tents



Technical textiles for safety, sports and rescue applications:
 e. g., protective clothing for bikers, equipment for mountain guides and mountain rescue services, parachutes, equipment for ships, life vests for emergencies, avalanche airbags, safety ropes, safety-relevant equipment for aircrafts that are subject to international safety standards



Textile membranes for safety-relevant electro-ionic applications:
 e. g., oil-repellent pressure-equalizing membranes, textile electric insulation materials



Textiles for protective packaging:
 e. g., breathable, mobile, textile hygienic protective containers, protective covers, protective sacks



Geotextiles and civil-engineering textiles:
 e. g., long-lasting, media-resistant erosion protection textiles and non-woven textiles for drainage purposes, coated tissues for radiation protection (Radon sealing)



Textiles for transportation purposes:
 e. g., fuel-repellent (fire load mitigating), flame-protected textiles for aircrafts, ships, railways, the public transportation system, breathable membrane textiles with separating function for aircraft construction, conveyors that have to comply with high hygiene requirements as they are used for the production of food and beverages