

A close-up photograph of a person's hand holding a dark blue garment on a wooden hanger. The hand is wearing a red beaded bracelet. The background is a blurred clothing store with other hangers and garments.

**MAKE THE
LABEL COUNT**



Make the Label Count

Campaign Milestones and Contributions

MTLC Highlights: Year 1

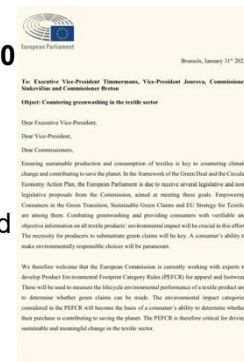
OCTOBER 2021

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



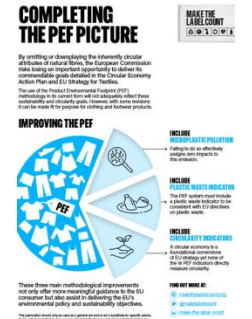
JANUARY 2022

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Make the Label Count campaign says system due to come into force in 2023 is misleading and outdated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

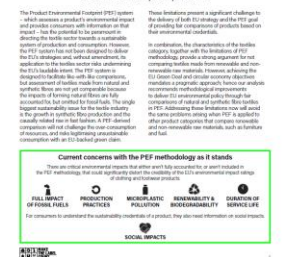
MAY 2022



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

Sustainability has become a priority objective for the European Union (EU). It is a key driver for policy development through the global leadership role the EU has taken in addressing climate change, decoupling economic growth from resource use, and the sustainable use of resources. The global supply of textiles has been recognized by the EU as a major source of emissions and resource use; the sector has become increasingly reliant on fossil feedstocks to supply synthetic fibres, and the textile industry has been roundly criticised for unsustainable and non-circular consumption patterns.



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



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

Putting fast fashion out of fashion

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



BY DALENA WHITE, SPOKESPERSON, MAKE THE LABEL COUNT
NOVEMBER 8, 2022 | 1:00 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."

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.



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

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.

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.

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.

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



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

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

APRIL-MAY 2024

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

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.

MTLC Highlights: Year 4



JAN-FEB 2025

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

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

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.



Brussels, Belgium 16 May 2025

Subject: Protect Nature from Fast Fashion

Dear Commissioner Roswell,
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 weight 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

Question for written answer: E-001299/2025
to the Commission
Rule 144
Yannis Mavralis (S&C)

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 product's environmental impact. This aim is to ensure the claims relate to concrete and verifiable actions (EU) that enhance 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 microplastics 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 'fast fashion' labels for apparel and footwear are based on environmental credibility 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 microplastics and biodegradability?

Brussels, 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 help amplify the reach** of the event on social media.



Charlotte Lemay · 3rd
Marqueuse, fondatrice de l'association Avenir Collectif...
Jules - Editeur · ID

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

MTLC engagement in numbers



- MTLC meetings and engagements since the commencement of the campaign in October 2021:
 - 82 meetings with EU institutional stakeholders, including:
 - 46 with MEPs/staff
 - 14 with European Commission
 - 18 with EU Permanent Representations
 - 4 civil society associations
 - Email outreach to 515 EU institutional stakeholders
 - 3 events organised with institutional stakeholders
- 71 coalition members
- 80+ speaking engagements

