



Brussels, 9 September 2008  
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## Opinion

**Title**                      **Impact Assessment on: Simplification of EU legislation in the field of textile names and labelling**

**(draft version of 16 July 2008)**

**Lead DG**                      **DG ENTR**

### **1) Impact Assessment Board Opinion**

#### **(A) Context**

EU legislation in the field of Textile Names and Labelling consists of three Directives – 96/74/EC, 96/73/EC and 73/44/EEC. These Directives need to be adapted each time a new generic name for a novel fibre is to be added to the technical annexes, it also requires all Member States to take action to transpose the amending Directives into national legislation. In the framework of the legislative simplification programme being undertaken by the European Commission, it is proposed to revise EU legislation on Textile Names and Labelling in order to simplify its adaptation to technical progress.

#### **(B) Positive aspects**

This draft IA report is of a good quality. It is well structured with good use of tables and graphs to illustrate the presentation. The report provides a clear and focused problem definition and provides a good range of realistic options. Extensive stakeholder consultation has taken place.

#### **(C) Main recommendations for improvements**

*The recommendations below are listed in order of descending importance. Some more technical comments have been transmitted directly to the author.*

#### **General recommendation:**

**The report could be improved further by clarifying how the feasibility of the standardisation approach could be better assessed in the future and explaining more clearly the unsuitability of non-legislative and self-regulatory options. A brief clarification of some aspects related to creating a network of recognised laboratories and third country impacts is also recommended. DG ENTR has already indicated it will take on board many of the detailed comments made by the Board.**

**(1) The report should further clarify the approach to Option 3 (transfer of quantification methods to the domain of standardisation).** Due to the lack of information, which the report correctly identifies, there are presently major uncertainties related to this approach, which limit the possibility of evaluating it in detail. However the report also indicates that standardisation has important qualitative benefits (for instance, regular revision of standards and unified approach) which were also emphasised by Member States (p.9). The report should therefore explain in more detail how it is intended to gather the necessary information and to develop cooperation with the European Committee for Standardisation in order to assess in future whether Option 3 would be an appropriate approach.

**(2) The report should include a clearer explanation of why non-legislative and self-regulatory options were discarded** including more information on the preference of industry and Member States for a regulatory approach at Community level. A brief presentation of the general objectives of the Textile Name Directive in the Section of Objectives (which presently only states the aims of the revision process) would be useful.

**(3) The report should clarify some aspects related to creating a network of recognised laboratories** by explaining why the Joint Research Centre can not assist the applicants in the preparation stage and being more specific whether the creation of a voluntary network of recognised laboratories would imply additional cost to Member States (p.44).

**(4) Concerning third country impacts,** the report should briefly describe how the regulation applies to the export and import of textile products; and what are the principles for granting new fibre names in third countries.

#### **(D) Procedure and presentation**

It appears that all procedural requirements have been complied with. The executive summary should contain a clear presentation of the quantified benefits of the policy option.

## **2) IAB scrutiny process**

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Author DG	ENTR G 4
External expertise used	No
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