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North-West Europe

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ROLE

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BRAND & RETAILER

CEO

You are the CEO of a CASUAL WEAR BRAND overseeing company strategy, operation and finance. You determine company compliance, quality, and sustainability strategy and targets. You are responsible for communicating with external stakeholders (NGOs, wholesaler, marketplace). You also manage stakeholder relationships, particularly with customers and suppliers.

Insider Knowledge:

You understand the new EU ESPR regulatory requirement and disclosure of substances of concern (SoC) will enter into applicability in 2029/2030. The information will be displayed via Digital Product Passport (DPP). You want to have a strategy for the transformation of data collection and sharing. You identify six departments related to ESPR, (1) legal, (2) product team, (3) R&D, (4) production team, (5) compliance, quality & sustainability, (6) IT.

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LEGAL DEPARTMENT

You are the legal department of a CASUAL WEAR BRAND continuously understanding and reviewing upcoming regulations that may impact the business. You communicate new regulatory risks and requirements to internal stakeholders, ensuring that all relevant teams are informed and aligned. You manage manufacturing agreements with suppliers to ensure contractual compliance and legal soundness. In cases of potential violations of EU regulatory requirements, you are tasked with handling these issues to mitigate risks and uphold the company's compliance standards.

Insider Knowledge:

You are aware that the EU ESPR is about to be enforced, including the requirement for disclosure of substances of concern (SoC). The information shall be shared with customers via the Digital Product Passport (DPP). The delegated act for textile products is under development and will be published in 2027 followed by a 18-24 months transition period until enforcement in 2029/2030. You have included relevant requirements into suppliers' manufacturing agreement. You need to educate internal teams on the latest requirements and prepare for the transition.

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PRODUCT TEAM

(DESIGNER, PRODUCT MANAGER)

You are the product team of a CASUAL WEAR BRAND responsible for designing casual and functional daywear. You select materials and create the product bill of materials (BOM). You collaborate closely with the R&D team, they identify new materials with specialised features to meet market demands and compliance requirements.

Insider Knowledge:

You are now designing products with specific garment wash appearance and functional attributes incorporating features such as garment-washed appearance, moisture-wicking, water-repellent, and UV-protective functions. Chemical finishing is applied to the product and materials. You prefer mechanically recycled cotton and polyester over virgin materials.

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BRAND & RETAILER

RESEARCH & DEVELOPMENT

You are the R&D team of a CASUAL WEAR BRAND driving the development of new materials to meet business objectives and compliance requirements. You work with material and product suppliers to confirm specifications and manufacturing details e.g. formulations, before production and conduct development testing with suppliers to ensure the compliance, quality and sustainability requirements are met.

Insider Knowledge:

You are working with the product team to create new products with specific garment wash appearance and functional attributes incorporating features such as garment-washed appearance, moisture-wicking, water-repellent, and UV-protective functions. You are developing garment washing formula with the garment manufacturer for appearance and for chemical finishings with fabric manufacturer for functional attributes. Concerning recycled materials, mechanical recycling could have issues on legacy chemicals. You are now developing based on AFIRM RSL and ZDHC MRSL requirements. You are informed by the legal and compliance teams that there are upcoming legal requirements on chemicals.

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BRAND & RETAILER

PRODUCTION TEAM

You are the production team of a CASUAL WEAR BRAND coordinating with garment and fabric manufacturers to execute production based on specifications set by the product team and R&D. You are responsible to collect production data, including test reports and certification documents based on AFIRM RSL and ZDHC MRSL requirements, provided by suppliers. You are responsible to notify the compliance, quality and sustainability team in case of any non-compliance or missing documents.

Insider Knowledge:

You mainly work directly with garment and fabric manufacturer and have limited visibility on their upstream suppliers or subcontractors. Suppliers generally provide production data in Excel or PDF format without harmonised standards. The data is simply captured by company sharefolder. With the new product collection applied with different chemical finishings, you notice suppliers sometimes forget to upload all relevant information.

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BRAND & RETAILER

COMPLIANCE, QUALITY & SUSTAINABILITY DEPARTMENT

You are the compliance, quality & sustainability department of a CASUAL WEAR BRAND setting policies aligned with the AFIRM Restricted Substances List (RSL) and ZDHC Manufacturing Restricted Substances List (MRSL) for chemical management. You collaborate with the legal team on policy updates and work with internal teams to ensure products meet compliance, quality, and sustainability standards. You review suppliers' documents and make final shipment decisions.

Insider Knowledge:

Due to limited resources, you design the testing program using a risk-based approach rather than covering the full scope of EU REACH and POPs restricted substances. Lab testing focuses on high risk substances and materials. Suppliers generally provide safety data sheets (SDS) in PDF or image format and you have limited visibilities to suppliers' upstream or subcontractors. With the upcoming ESPR, you propose to enhance chemical management with a traceability concept.

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BRAND & RETAILER

IT DEPARTMENT

You are the IT department of a CASUAL WEAR BRAND managing the company's e-commerce platform and supply chain system. You oversee the digital data flow from product design through development, production, and placing on market. You support the digitalisation of various departments based on their business requests.

Insider Knowledge:

The current system and processes heavily rely on Excel input. Data has to be transferred from suppliers' documents to the companies platform. This requires heavy manual work and error-prone. With the latest ESPR requirements and the Digital Product Passport (DPP), you propose a digital transformation by implementing IT tools to facilitate the data interoperability. The major challenge is the financial investment that is required and some smaller partners resist to digital tools due to small business volume.

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**GARMENT
MANUFACTURER**

CEO

You are the CEO of a GARMENT MANUFACTURER overseeing company strategy, operation and finance. You determine company compliance, quality & sustainability targets. You are responsible to sign manufacturing agreements with customers (brand & retailer) You also manage stakeholder relationships, particularly with brand & retailer and upstream suppliers.

Insider Knowledge:

Most of your customers are EU-based. You recently received requests from customers about the upcoming EU ESPR requirement on disclosure of substances of concern (SoC). Customers will update the manufacturing agreement and deploy new policy to prepare for the upcoming regulations. The implementation will start 2026/2027. You ask your (1) legal, (2) product team, (3) R&D, (4) production team, (5) compliance, quality & sustainability, (6) IT to plan the action items to fulfill customer requirements and educate upstream suppliers.

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**GARMENT
MANUFACTURER**

LEGAL DEPARTMENT

You are the legal department of a GARMENT MANUFACTURER responsible for the legal compliance of the company. You review and ensure the company is following customers' (brand & retailer) manufacturing agreement. You liaise with customers on compliance topics. Additionally, you put up the contracts with upstream suppliers including clauses related to compliance requirement. You also monitor the development of the EU and Turkish regulations

Insider Knowledge:

You are aware that the EU ESPR is about to be enforced, including the requirement for disclosure of substances of concern (SoC). The information shall be shared with customers via the Digital Product Passport (DPP). The delegated act for textile products is under development and will be published in 2027 followed by a 18-24 months transition period until enforcement in 2029/2030. Currently, Turkish chemical compliance requirements are mostly aligned with the EU REACH and POPs regulations. You notice that the customers' manufacturing agreement is updated with a new clause introducing chemical traceability.

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**GARMENT
MANUFACTURER**

PRODUCT TEAM

(DESIGNER, PRODUCT MANAGER)

You are the product team of a GARMENT MANUFACTURER communicating with the brand's product team to align on product and material specifications. You are also responsible for proposing new products and materials to meet customer expectations. You work closely with the fabric manufacturer to provide latest material and product choices.

Insider Knowledge:

You are offering a washed process, which can create a special appearance on the garment. The garment washing process is done in-house. Additionally, you also offer functionally and mechanically recycled materials from fabric suppliers. You are aware all garment wash and material finishings are chemically based. And the recycled materials can be from pre- and post-consumer recycled materials.

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**GARMENT
MANUFACTURER**

RESEARCH & DEVELOPMENT

You are the R&D team of a GARMENT MANUFACTURER developing and finalising the product specifications. You determine the process and chemicals to be used at the production stage. You collaborate with internal compliance, quality and sustainability departments to evaluate if chemicals are safe to use. You also liaise between customers and fabric manufacturers and help finding new materials with special features. You arrange development testing on the products and chemicals to ensure the compliance of customers' requirements.

Insider Knowledge:

You are working on a formulation for in-house garment washing processes to create distinctive garment appearances. The chemical supplier you selected is a global supplier, which can provide a safety data sheet (SDS) in GHS format and English. Your key customers follow AFIRM RSL and ZDHC MRSL requirements on chemical management. You are informed by fabric suppliers that their materials are finished in Asian local facilities and only provide chemicals detail in local language. You are also informed about potential legacy chemicals issues on mechanically recycled materials.

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**GARMENT
MANUFACTURER**

PRODUCTION TEAM

You are the production team of a GARMENT MANUFACTURER managing garment production in factory based on product specifications and records of chemical usage in Excel or PDF formats. You are responsible to verify fabric compliance against customer requirements when fabrics are delivered, including compliance, quality and sustainability requirements. You are responsible to notify the compliance, quality and sustainability team in case of any non-compliance or missing documents.

Insider Knowledge:

You mainly work with fabric manufacturer and have limited visibility to their upstream suppliers or subcontractors. Fabric manufacturers provide a safety data sheet (SDS) of chemical finishing in local language, which causes challenges in understanding, incorporating and sharing data with downstream customers. The records are commonly in PDF or Excel format. Additional staff is needed to improve data collection and sharing.

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**GARMENT
MANUFACTURER**

COMPLIANCE, QUALITY & SUSTAINABILITY DEPARTMENT

You are the compliance, quality & sustainability department of a GARMENT MANUFACTURER implementing internal chemical control processes based on AFIRM RSL, ZDHC MRSL and customers' requirements. You collaborate with the legal team on policy updates. You are responsible to educate internal teams and monitor upstream suppliers to ensure compliance. You also work on corrective actions in case of any non-compliance.

Insider Knowledge:

You work closely with direct fabric suppliers but lack visibility into how subcontractors are handling fabric finishing. Upstream suppliers often provide Asian local-language SDS. And the records are maintained in PDF or Excel formats. You often need to work with the production team to translate the information and review it before sharing with customers. You face challenges with different data point requirements from different clients.

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**GARMENT
MANUFACTURER**

IT DEPARTMENT

You are the IT department of a GARMENT MANUFACTURER managing the Enterprise Resource Planning (ERP) system for production and material inventory management. You support data transfer based on business needs.

Insider Knowledge:

The current system and processes heavily rely on Excel or PDF input, which is error-prone. The data attributes cannot fully match with customer requirements. The system is not designed for traceability and will require enhancement to meet with the upcoming data requirements. Without the enhancement, additional resources are needed to transform the data structure to meet new compliance requirements.

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**FABRIC
MANUFACTURER**

CEO

You are the CEO of a FABRIC MANUFACTURER overseeing company strategy, operation and finance. You are responsible to sign contract agreements with garment manufacturers. You also confirm the partnership with local subcontractors on fabric finishing. You also manage stakeholder relationship, particularly with brand & retailer, garment manufacturer and subcontractors.

Insider Knowledge:

Most of your customers are EU-based. You recently received requests from customers about the upcoming EU ESPR requirement on disclosure of substances of concern (SoC). Customers will update the manufacturing agreement and deploy new policy to prepare for the upcoming regulations. The implementation will start 2026/2027. You ask your (1) legal, (2) product team, (3) R&D, (4) production team, (5) compliance, quality & sustainability, (6) IT to plan the action items to fulfill customer requirements and educate upstream suppliers.

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**FABRIC
MANUFACTURER**

LEGAL DEPARTMENT

You are the legal department of a FABRIC MANUFACTURER responsible for the legal compliance of the company. You review and ensure the company is following customers' (brand & retailer, garment manufacturer) manufacturing agreement. You liaise with customers on compliance topics. Additionally, you put up the contracts with subcontractors including clauses related to compliance requirement. You also monitor the development of the EU and Asian regulations at manufacturing location.

Insider Knowledge:

You are aware that the EU ESPR is about to be enforced, including the requirement for disclosure of substances of concern (SoC). The information shall be shared with customers via the with Digital Product Passport (DPP). The delegated act for textile products is under development and will be published in 2027 followed by a 18-24 months transition period until enforcement in 2029/2030. Currently, Turkish chemical compliance requirements are mostly aligned with the EU REACH and POPs regulations. You notice that the customers' manufacturing agreement is updated with new clause introducing chemical traceability.

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**FABRIC
MANUFACTURER**

PRODUCT TEAM

(DESIGNER, PRODUCT MANAGER)

You are the product team of a FABRIC MANUFACTURER communicating with the brand's and garment manufacturer's product team to align on material specifications. You are also responsible in proposing new materials to meet customer expectations. You work closely with the garment manufacturer to provide latest materials choices.

Insider Knowledge:

You are offering new materials with chemical functional finishing and mechanically recycled materials. The finishing process is from 4 Asian local subcontractors: water repellent (1), UV protective (1) and moisture management (2). Recycled materials are mechanically recycled from pre- and post-consumer products. Recycled cotton is from textile materials (2 recyclers) and recycled polyester is from water bottles (1 recycler).

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**FABRIC
MANUFACTURER**

RESEARCH & DEVELOPMENT

You are the R&D team of a FABRIC MANUFACTURER developing and finalising the material specifications. You determine the process and chemicals to be used at the production stage, including fabric preparation, dyeing, etc. You collaborate with internal compliance, quality and sustainability departments to evaluate if chemicals are safe to use. You directly work with Asian local subcontractors on fabric finishings and recyclers. You are responsible to test the fabrics to ensure the compliance with client's requirements.

Insider Knowledge: You are managing all chemical formulations in the manufacturing process, internal and with subcontractors. You keep records and specifications on the recipes and process. Concerning compliance, you ensure that the materials meet AFIRM RSL and ZDHC MRSL requirements. You have 4 Asian local subcontractors on fabric finishing: water repellent (1), UV protective (1) and moisture management (2). Local subcontractors can provide a safety data sheet (SDS) in local language based on the GHS standard in PDF format. You have 3 recyclers supplying pre- and post-consumer recycled materials: recycled cotton is from textile materials (2 recyclers) and recycled polyester is from water bottles (1 recycler). Recyclers inform you about the potential legacy chemicals issues of mechanically recycled materials.

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**FABRIC
MANUFACTURER**

PRODUCTION TEAM

You are the production team of a FABRIC MANUFACTURER managing fabric production in factory based on fabric specifications and records of internal chemical usage in Excel or PDF formats. You also monitor the subcontractors' production of the fabric finishing. You are responsible to verify fabric compliance against customer requirements before fabric delivery, including compliance, quality and sustainability requirements. You are responsible to notify the compliance, quality and sustainability team in case of any non-compliance or missing documents.

Insider Knowledge:

You arrange testing on all fabrics before delivery based on AFIRM RSL. Concerning chemicals, you collect safety data sheets (SDS) on chemicals used internally or by subcontractors. The subcontractors provides SDS in local language. Internally the dyeing process is computer controlled concerning recipe and chemical usages. The records from subcontractors are commonly in PDF or Excel format. You often get requests from customers to translate the information and date format which requires manual work and error-prone.

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**FABRIC
MANUFACTURER**

COMPLIANCE, QUALITY & SUSTAINABILITY DEPARTMENT

You are the compliance, quality & sustainability department of a FABRIC MANUFACTURER implementing internal chemical control processes based on AFIRM RSL, ZDHC MRSL and customers' requirements. You collaborate with the legal team on policy updates. You are responsible to educate internal teams and monitor upstream suppliers and subcontractors to ensure compliance. You also arrange audits for subcontractors and work on corrective actions in case of any non-compliance.

Insider Knowledge:

You work closely with the subcontractors and notice that Asian subcontractors lack knowledge on upcoming EU regulatory requirements. Local suppliers can only provide chemical information in Asian local language, which is difficult to translate for customers. Records are kept in Excel or PDF format and sometimes not in standard formats. You face challenges with different data point requirements from different clients.

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**FABRIC
MANUFACTURER**

IT DEPARTMENT

You are the IT department of a FABRIC MANUFACTURER managing the system for production, material and chemical inventory management. You support the production team using machine to control on dyeing recipes and chemical usage. You support data transfer based on business needs.

Insider Knowledge:

The current system and processes heavily rely on Excel or PDF input, which are error-prone, especially data from subcontractors. The data attributes cannot fully match with customer requirements. The system is not designed for traceability and will require enhancement to meet with the upcoming data requirements. Without the enhancement, additional resources are needed to transform the data structure to meet new compliance requirements.