

From Policy to Practice: **Where PEF Meets French Regulation**



PEF vs French Environmental Labelling:

Your biggest questions on scoring, regulation, and strategy, answered by the people shaping the frameworks.

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PEF, Ecobalyse & the Road Ahead

At Peftrust, we believe change in fashion's sustainability journey will only happen through shared understanding, not complexity, and not competition.

That's why we created Coffee Pause: a space to step back, learn together, and ask the questions many teams are working through in parallel. No pitches. Just shared perspective.

In this edition, we tackled two of the biggest, and most confusing frameworks shaping the fashion industry: the EU-level Product Environmental Footprint (PEF), and France's Environmental Labelling System (Ecobalyse) and its Coût Environnemental. Both aim to establish standardised impact assessments and credible, comparable emissions indicators –the foundations we need for real transparency and effective reduction.

We were joined by two experts at the heart of these developments: Emilie Carasso, Director of Sustainability & Policy at 2B Policy, and Pascal Dagrassat from the French Ministry of Ecological Transition.

Thank,

-The Peftrust Team

Key Takeaways

- **France's Regulation Is Go for Launch**
 - The European Commission approved France's national environmental labelling scheme; but insisted that it needs to remain voluntary. The final step is the French Prime Minister's signature, expected by September 2025.
- **Use of Environmental Scores Will Be Regulated**
 - Once the French decree is signed, any score-based environmental claim on garments sold in France must use the official "Environmental Cost" method, logo, and supporting disclosures.
- **PEFCR for Apparel & Footwear Is Official, but Needs Updating**
 - The A&F PEFCR is now aligned with the 2021 PEF method. However, a major update to the method is scheduled for 2026, which will impose updates to the PEFCR as well.
- **Mandatory Data for French Scores Is Minimal**
 - Only a few simple data points are needed: material composition, weight, and manufacturing countries. Additional data is optional, supporting a scalable model.

Key Takeaways

- **PEF Single Score Cannot Be Used Publicly**
 - Across the EU, including France, the aggregated PEF Single Score is not allowed for consumer communication using the A&F PEFCR until the methodology is updated. PEF aggregated scores can still be used in other sectors.
- **PEF Is the Long-Term Strategy**
 - Despite current differences, both France and the EU agree: the Product Environmental Footprint (PEF) is the future foundation for environmental scoring.
- **France is a Testbed for Europe**
 - The French framework is designed to scale fast and test innovations that could inform future EU-wide policy under the Green Claims and ESPR directives.
- **Consistency Across Platforms Is Ensured by Design**
 - In France, declared scores and inputs are centrally submitted and automatically verifiable by the public Ecobalyse platform—no need for direct provider oversight.
- **Database Quality Is a Priority**
 - Both France and the EU are working on improving LCA databases. Verified contributions from industry (like Woolmark's wool data) are already being integrated in Ecobalyse.
- **Don't Wait for Brussels**
 - Brands should engage now. France's open, transparent, and adaptive model allows companies to align today with what's likely to be very similar to tomorrow's EU standard.

Green Light for France and the Future of PEFCR

Pascal, the European Commission just accepted the French Ecobalyse framework. What does this mean, and what are the next steps for its implementation?

Pascal Dagrás:

Yes, the European Commission has formally approved France's draft regulation on environmental labelling. France had notified this draft to the Commission, and the Commission had the legal right to block it, which it has done in the past for other Member States. But this time, it gave the green light, meaning France is now free to proceed with national implementation. [Link here](#)

Next Step: Signature of the Decree

The next and final step is the official signature of the decree by the French Prime Minister. Once signed, this regulation will require that any environmental score-based claim made on apparel sold in France must follow:

- The Environmental Cost methodology
- The use of the official logo, and
- Disclosure of additional parameters, as specified in the regulation.

ALTHOUGH VOLUNTARY, THIS REGULATORY APPROVAL IS SIGNIFICANT BECAUSE IT SHOWS THAT THE EUROPEAN COMMISSION DOES NOT VIEW FRANCE'S APPROACH AS A BARRIER TO EU-WIDE HARMONISATION. IF IT HAD, IT WOULD HAVE BLOCKED THE REGULATION.



PASCAL DAGRAS

ECOBALYSE SUPERVISOR, FRENCH
MINISTRY OF ECOLOGICAL TRANSITION

The last procedural step is a review by the Conseil d'État – a French advisory body – to ensure the regulation is legally sound. We expect the decree to be signed sometime between late June and September 2025.

Probability of implementation? Very high. Unless something unforeseen happens in the French political landscape, there is no indication that the decree won't be signed.

Importantly, dozens of brands are already calculating and displaying their Environmental Cost scores, even before the regulation is officially in place. The Commission's approval has already triggered movement in the market.

Emilie, what's the status of the PEFCR for Apparel & Footwear, and how does it compare to the French regulation?

Emilie Carasso:

For context, I am not a government official, but I served as the lead coordinator for the Apparel & Footwear PEFCR, which was recently completed.

IT'S IMPORTANT TO UNDERSTAND THAT FRANCE'S REGULATION IS A LEGAL PROCESS, WHILE THE PEFCR IS A METHODOLOGICAL FRAMEWORK DEVELOPED UNDER THE EUROPEAN COMMISSION'S GUIDANCE.

In 2019, the Commission issued a call for proposals to create category-specific calculation rules under the broader PEF (Product Environmental Footprint) method.



EMILIE CARASSO

DIRECTOR OF SUSTAINABILITY
& POLICY, 2B POLICY

The Apparel & Footwear Technical Secretariat (TS) was created in response to that call, and the PEFCR was officially adopted in May 2025.

What Happens Next with the PEFCR?

We now have a PEFCR that is fully aligned with the current version of the PEF method (as published in the Official Journal in December 2021). However, the PEF method itself is about to undergo a major revision, with a public consultation expected in summer 2025, and a formal planned for late 2026-2027

The updated method will address:

- New impact categories, including biodiversity and microfibres
- Possible revisions in the development process of PEFCRs (to improve speed and flexibility)
- The potential introduction of “shadow PEFCRs”, which are unofficial rules usually developed by the industry that may later be validated by the Commission

Impact on the Apparel & Footwear PEFCR

Once the PEF method is updated, the current PEFCR will no longer be fully compliant with the method and will need to be revised. There are two main options depending on how the Commission reforms the overall PEF system:

- Re-establish a new Technical Secretariat (TS), following the current process (including industry representation and mandatory EU Commission involvement requirements),
- Adopt a more flexible update mechanism
- Either way, updates are expected, and brands should anticipate changes late 2026-2027.

How is the French Environmental Cost Score calculated, and what data points are required?

Pascal Dagrás:

To explore the calculation firsthand, you can visit ecobalyse.beta.gouv.fr, the public calculator developed to help stakeholders understand how the French Environmental Cost Score works. (Note: the platform is currently only available in French.)

Now, to answer the question directly: the French methodology is built on a legally mandated framework, developed in response to a Citizens' Convention that stated every French consumer should be able to understand the environmental cost of every product they purchase, not just clothing.

Because of this ambitious goal, the methodology was intentionally designed to be simple and scalable. Any brand, regardless of size, should be able to calculate the score quickly and efficiently, with or without expert help.

Mandatory Data Points

Only a few parameters are required to calculate the Environmental Cost score:

- Material composition (e.g. cotton, polyester, wool)
- Product weight (e.g. 170g for a t-shirt)
- Countries of manufacturing steps:
 - Where the product is made
 - Where it is dyed
 - Where it is knitted or woven

These mandatory data points are already required under existing regulations for garments sold in France, so no new data collection is needed for most brands.

Optional (Nice-to-Have) Data Points

While not required, additional data can help improve accuracy:

- Origin of raw materials
- Details on trims and accessories (e.g. buttons, zippers)
- Durability indicators such as:
 - Price point
 - Number of products per model
 - Intended lifespan

These allow brands with more precise data or advanced systems to go further, but are not essential for compliance.

Why Keep It Simple?

The goal of the French system is broad adoption and fast scalability. That's why the methodology includes only the most essential data points, all of which are already available on product labels or required by other French and European regulations.

In the future, more complexity may be added, but for now, the focus is on making sure every brand has the tools to participate, quickly and effectively.

On Communicating Scores: Why the PEF Single Score Is Not (Yet) Allowed

Can brands use both the PEFCR single score and the French Environmental Cost score on products?

Emilie Carasso: Not at this stage. At present, the PEF single score is not permitted for consumer-facing communication when using the apparel and footwear PEFCR; however, it may be used internally or in B2B contexts, across France or any other EU Member State. The reason the aggregated score cannot be used for B2C communication for apparel and footwear products is to avoid confusion. Due to ongoing modifications and differences between the French Environmental Cost method and the PEFCR, the single scores would not be directly comparable.

Imagine displaying both scores on the same product, the numbers wouldn't match, and that would undermine credibility.

THE EUROPEAN COMMISSION'S REASONING, IN MY VIEW, IS CLEAR: IT DOESN'T MAKE SENSE TO PROMOTE A 2021 VERSION OF THE PEF SCORE WHEN A NEW, MORE ROBUST VERSION IS ON ITS WAY WITHIN 1-2 YEARS.

Releasing outdated scores now would risk confusion – and worse, damage the credibility of a methodology we need for the future.

“PEF Is the Path”

Pascal Dagrás:

LET ME EMPHASIZE SOMETHING THAT'S CRUCIAL: PEF IS THE PATH. IT IS THE HORIZON – NOT JUST FOR EUROPE, BUT POTENTIALLY FOR GLOBAL ENVIRONMENTAL POLICY.

We've seen this in France over the last few years: PEF has occasionally been misunderstood or even criticised, including by environmental NGOs. **That's a serious concern.**

It's unacceptable that a methodology built to support sustainability could be perceived as part of the problem, particularly when it leads to counterintuitive outcomes, such as ranking ultra-fast fashion products higher than garments made from organic cotton, simply due to current limitations in the model.

This is why the PEF revision is urgent and necessary. Without it, we risk discrediting a powerful tool at a time when we desperately need reliable, scalable frameworks to guide environmental policy and industry transformation.

We must not undermine PEF, we must improve it. Because PEF is the foundation for the future.

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So, for now:

If you're using the PEFCR, you may communicate individual impact categories (e.g., carbon footprint, water use), but you cannot publish the aggregated single score.

On Communicating Scores: Why the PEF Single Score Is Not (Yet) Allowed (cont'd)

In France, if you make a score-based environmental claim, you must use the official Environmental Cost methodology. If a brand wants to use both the PEFCR method and the Environmental Cost label in France, it must display the Environmental Cost score and can only complement it with additional indicators, like carbon footprint – not another single score.

A comparative ecoscore (e.g. traffic light or A-to-E) can also be added for comparison between different products.

Why Is the PEF Single Score Restricted for Apparel and Footwear products?

Pascal Dagrás:

This isn't just a French rule – it's EU-wide. The restriction on using the PEF single score is linked to the fact that the PEF methodology is currently under revision. Major updates are coming, especially in areas like:

- Biodiversity
- Microfibres

What happens if other Member States start adopting their own environmental labelling methods, as France has done?

Emilie Carasso:

This is still a somewhat hypothetical, but increasingly relevant, scenario.

For example, there are already open questions about whether the French Environmental Cost methodology would be sufficient to substantiate a claim in another Member State, such as Belgium or Italy. If more countries introduce their own national frameworks, these questions will multiply.

The answers will ultimately depend on the Green Claims Directive, which is currently under negotiation at the European level. This directive aims to establish uniform guidelines, particularly regarding the use of aggregated environmental scores in public-facing claims.

Based on the most recent versions we've seen (which remain subject to change), the directive would:

- Allow aggregated scores if they are embedded in EU law
- If there's no EU level methodology, potentially accept them if adopted into national legislation, as is the case with the French regulation
- Potentially prevent industry led or other voluntary labels from being used.

In such cases, it would be up to each Member State's market surveillance authorities to decide whether a claim is acceptable or not, and whether it meets the criteria of being scientifically substantiated and not misleading.

Currently, there remains significant uncertainty. What we can refer to is the Empowering Consumers Directive, which provides some initial guidance on how environmental claims should be made. However, it is expected to be complemented by the final version of the Green Claims Directive, which will clarify the legal framework.

We are watching the progress of these negotiations very closely, and we hope to see more clarity, particularly around the status of national methods – before the summer.

Was the PEFCR also conceived with ecodesign and internal benchmarking in mind, beyond communication to consumers?

Emilie Carasso:

Absolutely.

While communication is one application of the PEFCR, the original spirit and value of the methodology go far beyond that. Once a brand conducts a PEF (Product Environmental Footprint) study on its products, it gains a much deeper understanding of the environmental impacts across the entire product life cycle – from raw material sourcing to end-of-life.

This insight allows brands to:

- Identify environmental hotspots (e.g. material choice, production processes, logistics)
- Evaluate product design decisions
- Rethink supplier relationships
- And ultimately, optimise products with sustainability in mind

In fact, one of the most impactful phases for many textile products is the use phase – washing, drying, and ironing. This stage often goes overlooked, but it can significantly affect the overall footprint.

That's why we encourage brands to go beyond compliance and consumer-facing claims. Use the PEFCR as an internal benchmarking and ecodesign tool:

- Engage suppliers
- Reassess materials and durability
- Improve consumer guidance to reduce impacts during use

The methodology isn't just for scoring, it's a strategic tool for product development, impact reduction, and long-term sustainability planning

What's the link with the Ecodesign for Sustainable Products Regulation (ESPR)?

ESPR is a sector agnostic regulation, which will need to be complemented by sector specific Delegated Acts (DA) which are currently under development. Textiles will be first.

Many of the key parameters discussed under the Textiles DA, such as physical durability, reparability, and environmental footprint – have already been addressed in detail within the Apparel & Footwear PEFCR. So while the textile DA may not require brands to follow the PEFCR directly, the methodology is already informing the legislative process.

We know that the Joint Research Centre (JRC), which is leading the development of the textile delegated act, is actively reviewing and drawing from the PEFCR work. It's likely that certain elements will be adapted or adopted into ESPR requirements.

What should brands expect?

- ESPR may require information disclosure (e.g. carbon footprint), likely via the Digital Product Passport (DPP)
- There is also the possibility of future performance requirements (e.g. maximum carbon thresholds), but these are not expected in the short term
- The PEFCR may be used as a reference methodology to calculate or substantiate these required disclosures

That said, we are still in a transitional moment. The next major update, including the JRC's guidance on environmental footprinting, is expected after summer 2025. Until then, much remains to be confirmed.

FINAL NOTE:

AT THIS STAGE, BRANDS SHOULD BE AWARE THAT ALIGNMENT IS ALREADY HAPPENING BEHIND THE SCENES: THE APPAREL AND FOOTWEAR PEFCR IS SHAPING THE FOUNDATION OF FUTURE ESPR REQUIREMENTS FOR THE TEXTILE SECTOR. STAYING AHEAD BY FAMILIARISING YOURSELF WITH THE METHODOLOGY WILL LIKELY PROVE A STRATEGIC ADVANTAGE.

Will Ecobalyse remain a voluntary tool, or is there a plan to make it mandatory in the future?

Pascal Dagras:

The French law adopted in 2021 does indeed include provisions for making environmental labelling mandatory, not just for garments, but for all products sold in France. However, as of today, the French government is only discussing a voluntary scheme, and the European Commission also supports keeping it voluntary for now.

So, while the legislation provides the legal basis for a future mandatory rollout, there is no official plan at this stage to enforce it in the short term.

That said, the momentum is very promising. We've already seen dozens of brands voluntarily calculate and display their Environmental Costs. The engagement from both brands and the expert providers supporting them has been impressive, including some excellent work by companies like Peftrust, who have already supported several implementations.

In that sense, the voluntary vs. mandatory distinction may soon become less relevant. The ecosystem is already in motion, and if this positive dynamic continues, widespread adoption could occur without the need for enforcement.

IN SHORT: THERE'S NO IMMEDIATE PLAN TO MAKE ECOBALYSE MANDATORY, BUT THE MARKET MAY GET THERE ON ITS OWN.

On the Alignment Between French and European Systems

While differences exist between the French Environmental Cost method and the PEFCR, efforts are ongoing to align the two. Key distinctions:

- Impact categories: PEF uses 16; France uses 14 (excluding ecotoxicity, for example).
- Microfibres: Different integration approaches.
- Durability: France includes extrinsic durability (e.g. fast fashion), while PEFCR focuses on physical durability.

Despite these differences, harmonisation is inevitable. As Pascal emphasised, “There will only be one methodology at the European level – there’s no other viable option.” Fragmented approaches would be unsustainable for brands operating across Europe.

On Communicating Scores

At present, the PEF Single Score cannot be communicated to consumers in the apparel and footwear sector. This is not specific to France, it applies EU-wide. The reason is simple: the methodology is currently under review, and sharing outdated or conflicting scores could lead to confusion.

In France, if a brand makes a claim based on an environmental score, it must use the official Environmental Cost methodology and logo. Additional information, such as carbon footprint, may be included, but not an apparel and footwear PEFCR based Single Score.

As more service providers enter the market to calculate environmental scores, are any measures being implemented, or planned, to ensure consistency across platforms?

Pascal Dagrás:

Yes, this is a crucial concern – and one that has been carefully addressed, particularly within the French regulatory framework.

Level 1 Methodology: Designed for Simplicity and Consistency
The current French Environmental Cost system is based on what we call a “Level 1” regulatory scheme. It’s intentionally simple, requiring only a few input parameters (e.g., material composition, weight, and country of manufacture).

This simplicity is what makes automated consistency checks possible.

Rather than directly monitoring or certifying individual service providers, the system ensures consistency through a centralised public platform.

Here's how it works:

- Each brand (or its service provider) must declare its score and the input parameters used to calculate it.
- The score itself is made public; anyone can view it.
- The parameters are kept confidential but can be used by French authorities to verify the score using the Ecobalyse engine automatically.
- This means the French administration can systematically and efficiently validate scores, without needing to audit or monitor service providers individually.

Result: High scalability and a reliable, self-checking system without added burden on either the administration or the ecosystem of providers.

The Role of Service Providers

Let's be clear: service providers are essential. There are thousands of products and brands, and no public system could scale without strong private-sector support. France is not seeking to control or certify every provider; rather, it provides a transparent, automated framework that guarantees consistency regardless of who performs the calculation.

What About the Future? (Level 2 Methodology)

Looking ahead, France is preparing a Level 2 regulatory framework. This will be more detailed, more aligned with the PEFCR, and allow brands to leverage more granular and specific data where available.

However, this greater precision will also require:

- Additional consistency measures
- Validation processes
- Possibly third-party verification or testing

These added checks will ensure that as the methodology becomes more sophisticated, consistency remains intact, without sacrificing flexibility for innovative or data-rich brands.

Final Thought

For Level 1, automated and transparent oversight is already built in. For Level 2, stronger validation will follow. In both cases, the goal is the same: a reliable, scalable system that encourages participation, supports innovation, and ensures credibility.

On Data and Transparency

The strength of both methodologies relies heavily on the quality of underlying databases. Today, the PEFCR uses the Environmental Footprint (EF) database v3.1, which is free to use until the end of 2025. A new distributed model (EF 4.0) is in development, which will:

- Encourage industry contributions
- Allow for more frequent updates
- Support greater transparency and disaggregation

in France, Ecobalyse – the public calculator used for Environmental Cost – already supports integration of verified datasets. For instance, Woolmark submitted new data on wool, which was reviewed and approved by ADEME.

We're speaking a lot about methodology and calculation — but what about the underlying databases used in Ecobalyse and the PEF CR? Outdated or non-representative data can heavily influence results. Are there concrete plans to improve these databases?

Pascal Dagrás:

This is an excellent and fundamental question – because no methodology is stronger than the data behind it.

Both the French Environmental Cost system (via Ecobalyse) and the European PEF approach (using the EF database) rely on structured datasets to power their calculations. In both cases, these databases are evolving, and their improvement is a top priority.

At the EU level, the current Environmental Footprint (EF) database version 3.1 is nearing the end of its life. A new generation, **EF 4.0**, is being developed. This future version is expected to be more open, transparent, and collaborative – with **greater capacity for disaggregated data** and contributions from industry. This is a critical strategic shift for the European Commission.

FRANCE IS NOT WAITING. THROUGH OUR PARTNERSHIP WITH ECOINVENT, AND WITH THE SUPPORT OF ADEME, WE'VE ALREADY BUILT A SYSTEM WHERE YOU CAN SUBMIT YOUR OWN DATA FOR VERIFICATION AND INCLUSION.

A great example is Woolmark, which submitted specific data on wool production. After verification, that data is now integrated into the French methodology.

The door is completely open.

Come see us.

Propose your evaluation and your data – we'll verify it and, if sound, we'll integrate it.

No problem. In fact, it's in everyone's best interest that we do.

This applies to any sector, any label. If, for example, GOTS or another certifier wants to demonstrate that their processes are more sustainable than conventional equivalents, they're welcome to present that data. We'll assess it, and if validated, include it.

This is why we often say: France is pioneering. We are testing a system that can move faster than the EU-wide mechanism, and that allows us to build a scalable model – one that Europe can adopt and learn from. What works in France can feed into the EF 4.0 system.

So, don't wait for the European Commission to update everything. That will take years. Start now, with France. We're open, ready, and committed to building the kind of robust, transparent, and science-based framework

Final Thoughts

France is seen as a testing ground for future European regulation. By pioneering a national scheme that mirrors European ambitions, it helps identify what works – and what doesn't – before scaling across the EU.

As Pascal concluded:

“WE NEED A STRONG, CREDIBLE PEF. BUT IF ENVIRONMENTAL NGOS AND CONSUMERS LOSE TRUST IN THE METHOD, IT'S A MAJOR RISK. THAT'S WHY THESE UPDATES AND ALIGNMENT EFFORTS ARE SO CRITICAL.”

From Policy to Practice

Laying the Groundwork for What's Next

The momentum is real – and so are the questions. From shifting policy to evolving methods, the road to credible environmental scoring in fashion is full of nuance. But as we heard from Pascal and Emilie, the direction is clear: PEF is the future, and France is leading a critical test phase that will shape how the EU moves forward.

What does that mean for brands today?

You don't need to wait. With the right tools, the right questions, and a willingness to collaborate across the value chain, teams can already align with what's coming, while gaining clarity, driving internal action, and preparing for scale.

At Peftrust, we'll keep holding space for these conversations. We'll keep turning insight into context, and complexity into something your teams can work with.

Because none of us will figure this out alone. But together, we might just get there faster.

– The Peftrust Team

Ready to Turn Insight into Action?

Explore how your products measure up, align with evolving French requirements, and scale PEF-compliant assessments with confidence.



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