

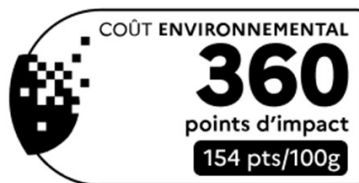
Understanding Ecobalyse

The French Environmental Footprint Method

What is Ecobalyse and where is it used? Ecobalyse is a national scoring tool developed by the French government to evaluate the environmental impacts of textile and footwear products. Built on Life Cycle Assessment (LCA) principles, it has been tailored for consumer-facing communication, integrating indicators that go beyond traditional environmental metrics to reflect real-world product use and disposal. As of 15 May 2025, the European Commission officially approved France's request to use Ecobalyse nationally. It is voluntary for companies to calculate an Ecobalyse single-score to substantiate environmental claims in B2C communications in France.

How does it work? Ecobalyse is built on a life cycle assessment (LCA) methodology. This means it breaks down a garment's environmental impact into stages such as raw material production, manufacturing, use, and end-of-life. For example, climate change impact might be assessed through greenhouse gas emissions, while water scarcity or toxicity impacts are assessed through specific environmental models.

What is the implementation timeline? The final French decree and order implementing Ecobalyse will enter into force on 1 October 2025. From 15 September 2025, a public portal is available online, enabling brands to voluntarily calculate and submit Eco-Scores for their products. Consumers will be able to use this portal to look up a product via its barcode number and access information about its environmental properties.



What are the limitations of Ecobalyse? While Ecobalyse fills some gaps currently present in the PEF methodology, further improvements are necessary to ensure it delivers on its goal to genuinely support environmental policies. Key issues include:

- Ecobalyse does not yet target fast fashion business models such as the release of numerous collections per year. To discourage these practices, the methodology could reward products with longer market presence, for example by considering a longer stock-keeping unit (SKU) lifetime.
- The current methodology undervalues biodegradability. Its Circular Footprint Formula could be replaced with more robust circularity metrics such as the World Business Council for Sustainable Development's (WBCSD) Circular Transition Indicator (CTI) or the Ellen MacArthur Foundation's (EMF) Material Circularity Indicator (MCI).
- The methodology's sustainability coefficient is intended to ultimately include testing. Modest baseline durability thresholds should be used to avoid skewed results. Too high of a threshold for durability testing would end up favouring synthetic fibres with no positive effects on products' lifespan.
- Ecobalyse currently overlooks the impact of plastic waste accumulating in landfills. A new impact category for persistent solid waste should address this omission.



MAKE THE LABEL COUNT

- While price is a major factor in perceived product value and longevity, it is currently overlooked by Ecobalyse. This could be addressed through a product-price to average-product price ratio metric in durability scoring.
- Ecobalyse could expand traceability to include fibre origin (e.g., Mongolian cashmere, Egyptian cotton, Australian merino) as provenance influences both consumer value and sustainability.
- To ensure fair comparisons between renewable and fossil-based fibres the method could harmonise system boundaries in line with ISO guidance. This would correct the bias towards fossil fuel-based fibres.

How does Ecobalyse differ from the EU PEFCR? While both frameworks are LCA-based and share conceptual roots, Ecobalyse introduces methodological improvements and fills important gaps in the PEFCR, particularly relevant for natural fibres:

- **Durability:** Ecobalyse includes extrinsic durability metrics – i.e., incentive to repair, SKUs range width – whereas the PEFCR for Apparel and Footwear only assesses intrinsic physical durability through lab tests.
- **Microplastics:** Ecobalyse assigns greater significance to fibre fragmentation, aligning with growing scientific evidence of microplastic pollution's harm.
- **End-of-life:** Ecobalyse incorporates the impact of exported textile waste, recognising global environmental externalities.
- **Databases:** It draws on French-specific datasets (e.g., Base Empreinte, Ecoinvent 3.9), as opposed to the EF methods 3.1 database used by PEFCRs.

These design choices make Ecobalyse generally less biased against natural fibres, offering a more realistic portrayal of their circularity and longevity.

Why is having two B2C single scores problematic? The coexistence of Ecobalyse and the PEFCR creates the risk of consumer confusion across EU markets. A single product such as a wool T-shirt could receive a “low impact” score in France via Ecobalyse and a “medium” or “high impact” score in another country using the PEFCRs for A&F v3.1. This inconsistency would undermine policy coherence and consumer trust. To mitigate this, the European Commission has restricted the use of a consumer-facing single environmental score under the current PEFCR for A&F. Brands should instead disclose at least the top four contributing impact indicators, rather than an aggregated score. The goal is to ensure greater transparency and avoid oversimplified comparisons that misrepresent sustainability performance.

Could Ecobalyse improve future PEF updates? Ecobalyse serves as a valuable test bed for methodological improvements and will most probably continue to improve based on additional research. The European Commission may consider integrating aspects into the revised EF methods 4.0 or future PEFCR iterations. The developers of Ecobalyse methodology have been innovative in addressing several weaknesses of traditional LCA, but more innovation is needed to deliver a level playing field across natural and fossil fuel-based raw materials. With Ecobalyse and PEFCR methodology ultimately expected to converge, further novel thinking by Ecobalyse developers is encouraged to address the listed limitations prior to convergence.