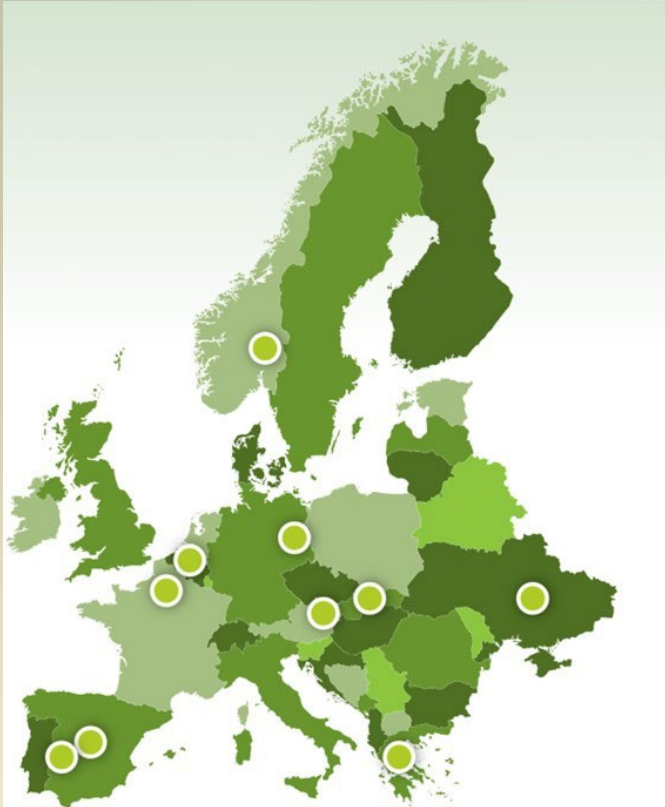
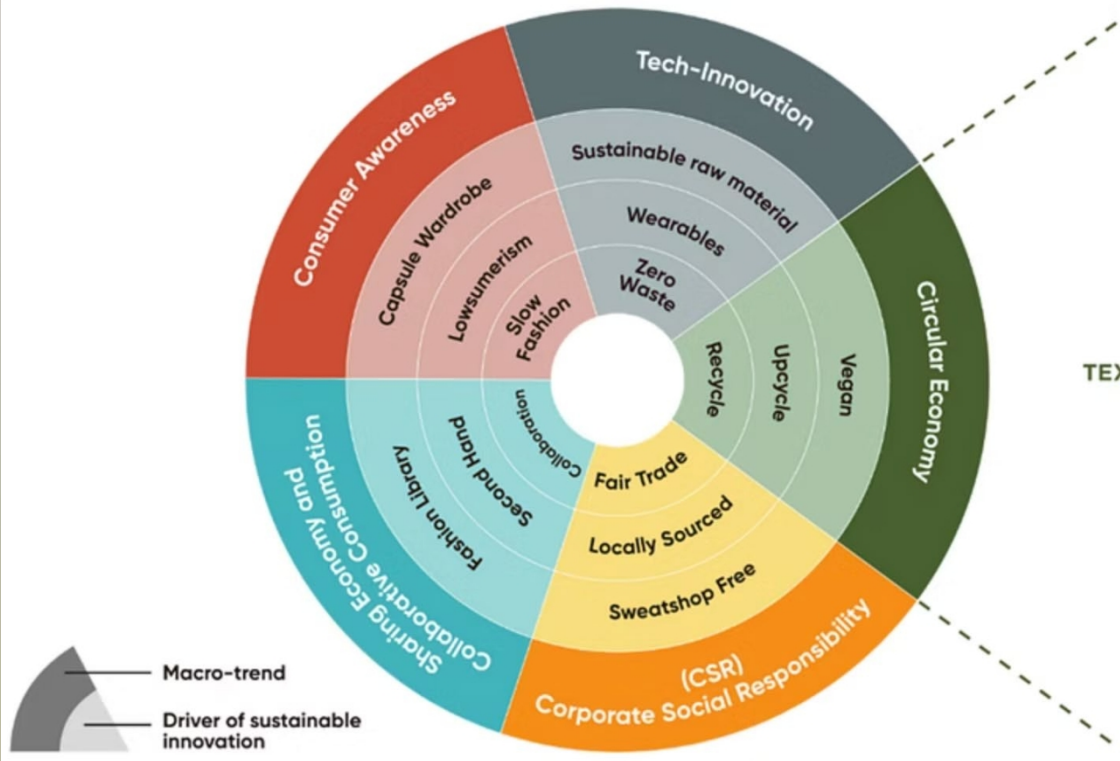
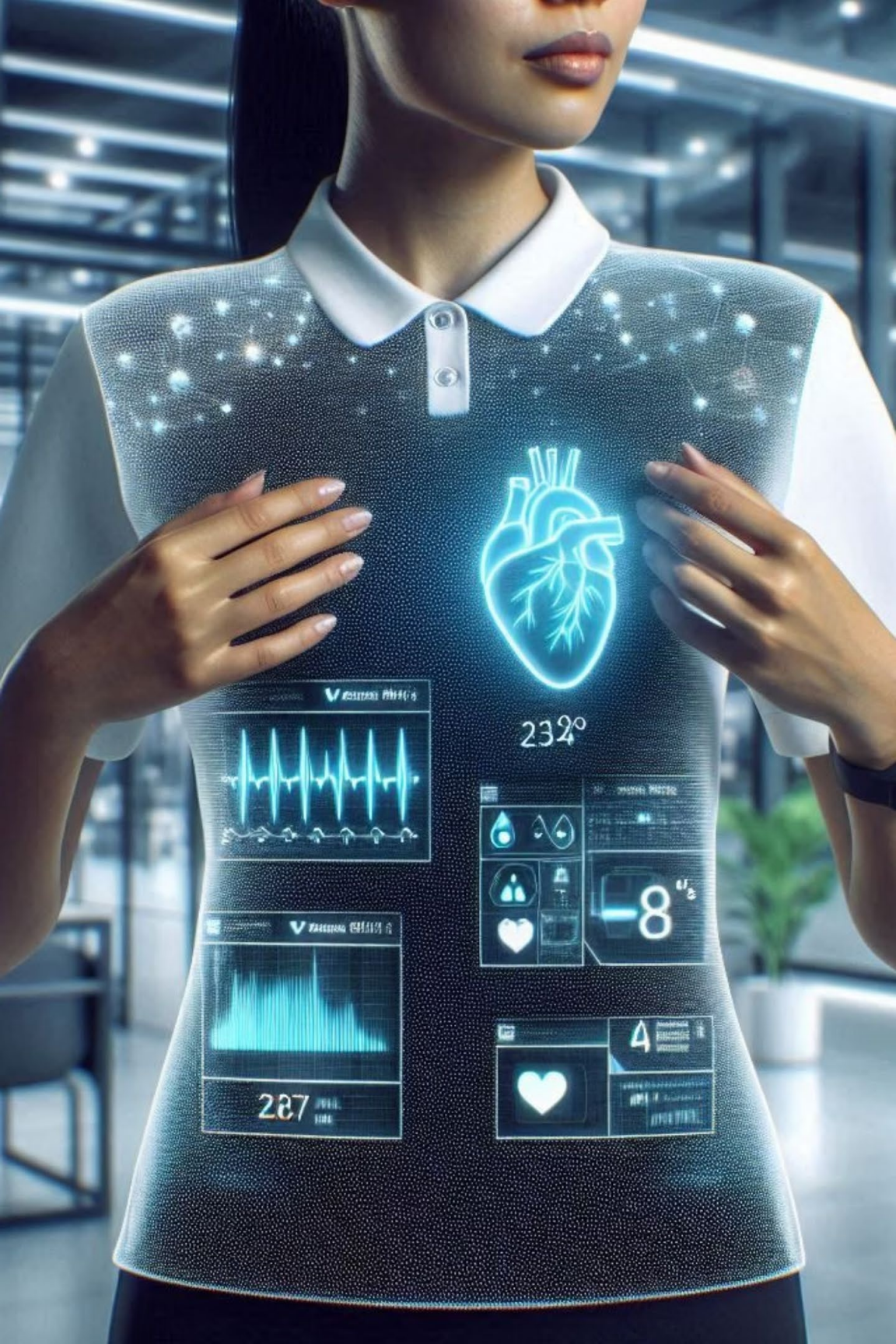


Strategic proposals

An initiative promoted by:





Circular Data Highway for Fashion Spain

Sector-specific infrastructure for traceability, eco-design, certification and ESG compliance in the textile, fashion and clothing sector.

Strategic project led by **ASECOM**, **FEDECON** and the **Spanish Fashion Confederation** with pilot schemes implemented in:

- Digital Product Passport
- Verifiable certifications
- Digital eco-design and pre-production validation using AI
- Calculation of eco-taxes and eco-modulation under the DRAP project

📄 We are not proposing a standalone tool. We are proposing a **shared sector-wide infrastructure** to enable fashion companies in Madrid and across Spain to respond in a practical and scalable way to circularity, traceability and new market and regulatory requirements.

Why now

The moment is critical

The European textile sector is entering a phase where sustainability is moving beyond mere communication to become **structured, verifiable and actionable data**. The Commission has made progress in simplifying the CSRD framework, has promoted the **VSME** for SMEs and maintains a regulatory roadmap that will continue to impose requirements on value chains. At the same time, textiles remain an explicit priority of the European circularity strategy and the ecodesign framework.

Key takeaway

Even if the thresholds for formal obligations are raised, **the real pressure from the market will not ease**: customers, financiers, tenders and supply chains will continue to demand ESG information, traceability, circularity and evidence. This is fully in line with the sectoral guide: SMEs in the textile sector will be affected by the ‘ripple effect’ and need a proportionate, sector-specific response.

Alignment with RIVCircular

RIVCircular seeks

To support interregional projects that develop or implement circular economy technologies across five themes, including **the circular economy in the textile industry** and **digital solutions for the circular economy**. The official call requires a consortium and is open to stakeholders from the 8 eligible regions.

Proposed alignment

Our proposal fits under **Topic 4 – Textile Circularity**, as it addresses:

- sectoral traceability
- DPP
- material circularity
- preparation for certification
- reduction of overproduction
- economic mechanisms linked to RAP and eco-modulation

The digital layer is not the end goal of the project: it is the **enabling tool**.

The industry challenge

Today, many companies in the fashion and clothing sector operate with:

Fragmented data

Data fragmented across design, purchasing, production, quality and sales.

Poor traceability

Poor traceability of materials and records.

Disconnect in eco-design

Difficulty in linking eco-design with actual product decisions.

No common framework

Lack of a common layer for certification, voluntary reporting and DPP preparation.

No operational tools

Lack of operational tools to translate circularity into cost, eco-tax and business decisions.

- The preliminary DPP proposal you have already been working on identifies precisely this problem: there is a lack of a platform that integrates data on materials, processes, the supply chain and documentary evidence into a structured, auditable and shareable record.

The strategic response

The Circular Data Highway for Spanish Fashion will be a shared infrastructure connecting four layers:



What makes it different

It doesn't start from scratch or propose a theoretical pilot. It reuses existing assets and lines:

- DPP architecture and compliance engine
- ASECOM and the Confederation's experience in sectoral coordination
- digital eco-design line with MyAlwear
- and DRAP's economic-regulatory calculation logic for RAP and ecomodulation

Overall objective

To create and validate a sectoral data infrastructure for the fashion industry that enables SMEs and brands within the Madrid ecosystem to:



Structure information

Structure product and supply chain information.



Generate evidence

Generate and maintain verifiable evidence.



Enable DPP

Enable Digital Product Passport.



Facilitate certification

Facilitate certification and external verification.




Anticipate VSME/ESG

Anticipate VSME/ESG requirements from clients and financiers.



Translate circularity

Translate circularity into design, production and cost decisions.

 **Expected outcome:** Move from a management model based on scattered documents and reactive responses to a model based on **interoperable, traceable and reusable data.**

The 4 pillars of the project

Pillar 1. Data Highway Core

Sector-specific backbone for SKUs, materials, processes, batches, suppliers, evidence and access rules. Includes a document repository, regulatory matrix, data quality validation and DPP generation.

Pillar 2. Certification and Verifiability

Integration with schemes and evidence useful for auditing and certification, with a natural partner for validation and scaling. The market already operates using ISO 14001, GRS, OCS, OEKO-TEX, ISO 50001, SA8000 and other standards as a basis for verifiable trust.

Pillar 3. Digital Eco-Design and pre-production validation

Demonstration layer with MyAIwear to reduce physical samples, accelerate time-to-market and validate demand before production. This reduces rework, surplus stock and waste.

Pillar 4. EPR, eco-taxes and eco-modulation

A calculation engine that links product attributes, circularity and traceability with EPR obligations, eco-taxes and eco-modulation logic, based on developments from the DRAP project.

Functional structure of the system

- 1** Module A. Sector-specific product data lake
SKU, collection, variants, composition, supplier, batch, treatments, certifications, packaging, end-of-life.
- 2** Module B. Evidence repository
Declarations, certificates, test reports, technical data sheets, audits, regulatory documents, integrity hashes and metadata.
- 3** Module C. Compliance engine
Mapping of requirements and evidence for DPP, VSME, value chain, certification and reporting.
- 4** Module D. Service layer
DPP generation · Auditable package for verification · Circularity and readiness dashboard · RAP/eco-tax/eco-modulation calculation · Interoperable exports.
- 5** Module E. Demonstration use cases
AENOR, MyAlwear and Diagnostic EPR project as visible applications of the backbone.

Use case 1: Certifications with companies (under negotiation)

Objective

Turning certification into a driver for the sector, rather than a one-off administrative burden.

Strategic value

Certifications are the bridge between claimed sustainability and demonstrable sustainability. The sectoral guide highlights precisely this: trust increases when there is third-party assessment, auditing and verifiable traceability.

What it offers

- readiness assessment by company
- map of reusable evidence
- alignment between product data, processes and certifiable schemes
- reduction in the cost of document preparation
- greater credibility with clients, in tenders and with funders



Use case 2: MyAIwear and digital eco-design

Objective

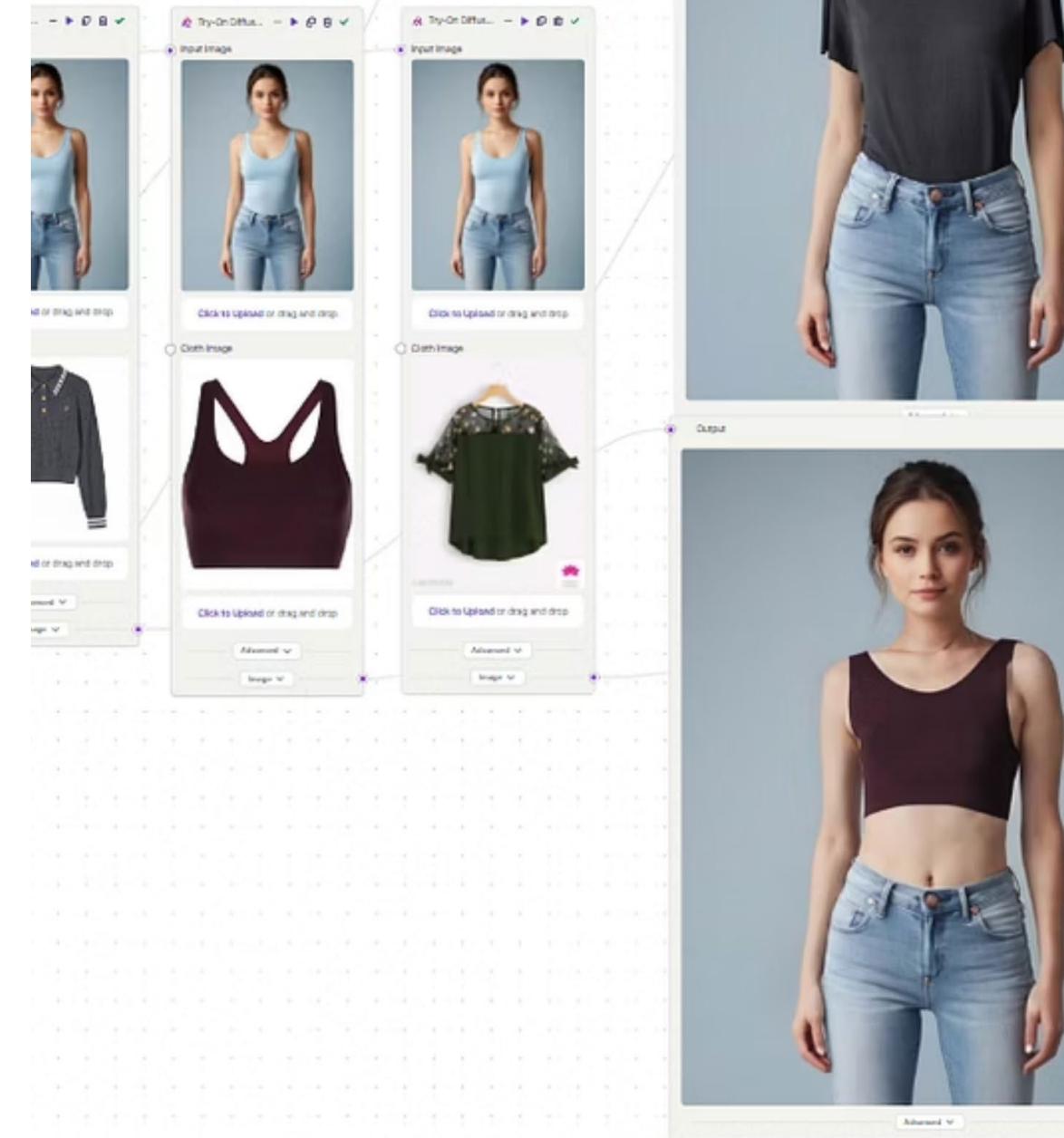
Reducing physical samples and overproduction through AI-generated digital content and prior demand validation.

Application

- AI image and video without the need for a physical sample
- changes to colour or style at no extra cost
- product acceptance testing prior to manufacturing
- preparation of enhanced product sheets for e-commerce
- population of fields useful for DPP

Message to Madrid+d

It is not just a commercial tool. It is a **lever for circularity**: fewer prototypes, less waste, less uncertainty, better production decisions.



Use Case 3: D-EPR (), eco-taxes and eco-modulation

Objective: To transform the regulatory and economic complexity of the RAP into an operational capability for businesses.



Calculate eco-tax scenarios

Calculate eco-tax scenarios by product or family.




Model eco-modulation variables

Model eco-modulation variables and reward attributes of circularity and traceability.



Future cost simulations

Enable simulations of future product costs and help brands and SMEs make design and procurement decisions based on economic criteria.

 **Strategic value:** The company stops viewing the RAP as an external obligation and begins to use it as a signal to redesign products, packaging, traceability and materials strategy.

Consortium governance

Proposed leadership

ASECOM

Overall coordination, business engagement, sectoral steering in Madrid.

Confederación Moda España

National roll-out, sectoral transfer, institutional dialogue.

FEDECON

Geographical coverage and base of commercial and fashion SMEs in Madrid.

Recommended technical partners

- technology centre / university for architecture and impact assessment
- Technology partner for development and interoperability
- Certifier/Auditor for the verification/certification layer
- MyAIwear for digital eco-design
- Pilot companies in fashion, clothing, retail or accessories

It is precisely argued that the logical role of a sectoral association such as ASECOM is to provide coordination, dissemination and sectoral leadership, with substantial funding for non-commercial activities.

Interregional dimension

The call requires cooperation between stakeholders in the participating territories, currently identified on the official website as **Madrid, Extremadura, Inlandet, Košice, Kyiv-Oblast, Hauts-de-France, Vienna and Greece** at national level.

Textile or materials recycling

Region with capacity for textile or materials recycling.

Digital passport / interoperability

Region with expertise in digital passports and interoperability.

Certification and traceability

Region with experience in certification, traceability or valuation.

Message: Madrid provides sectoral leadership and business critical mass; the interregional consortium provides specialisation, comparative validation and European scalability.



Work packages

01

WP1. Governance, consortium and sectoral framework

Coordination, requirements, business segmentation, selection of pilot projects.

02

WP2. Data Highway Architecture

Data model, evidence, rules, interoperability, dashboards, access.

03

WP3. DPP and compliance engine

Regulatory matrix, data validation, generation of auditable package.

04

WP4. Certification demonstrator

Certifiable readiness, evidence mapping and verification pilots.

05

WP5. MyAIwear demonstrator

Digital eco-design, sample reduction and pre-production validation.

06

WP6. D-EPR demonstrator

Calculation of eco-taxes, eco-modulation scenarios and decision table.

07

WP7. Evaluation, replicability and scaling

KPIs, business case, transfer to other regions and post-project plan.

Project KPIs

Deployment KPIs

- Number of pilot companies on board
- No. of products/systems uploaded
- % of data fields completed
- No. of validated documentary records

Impact KPIs

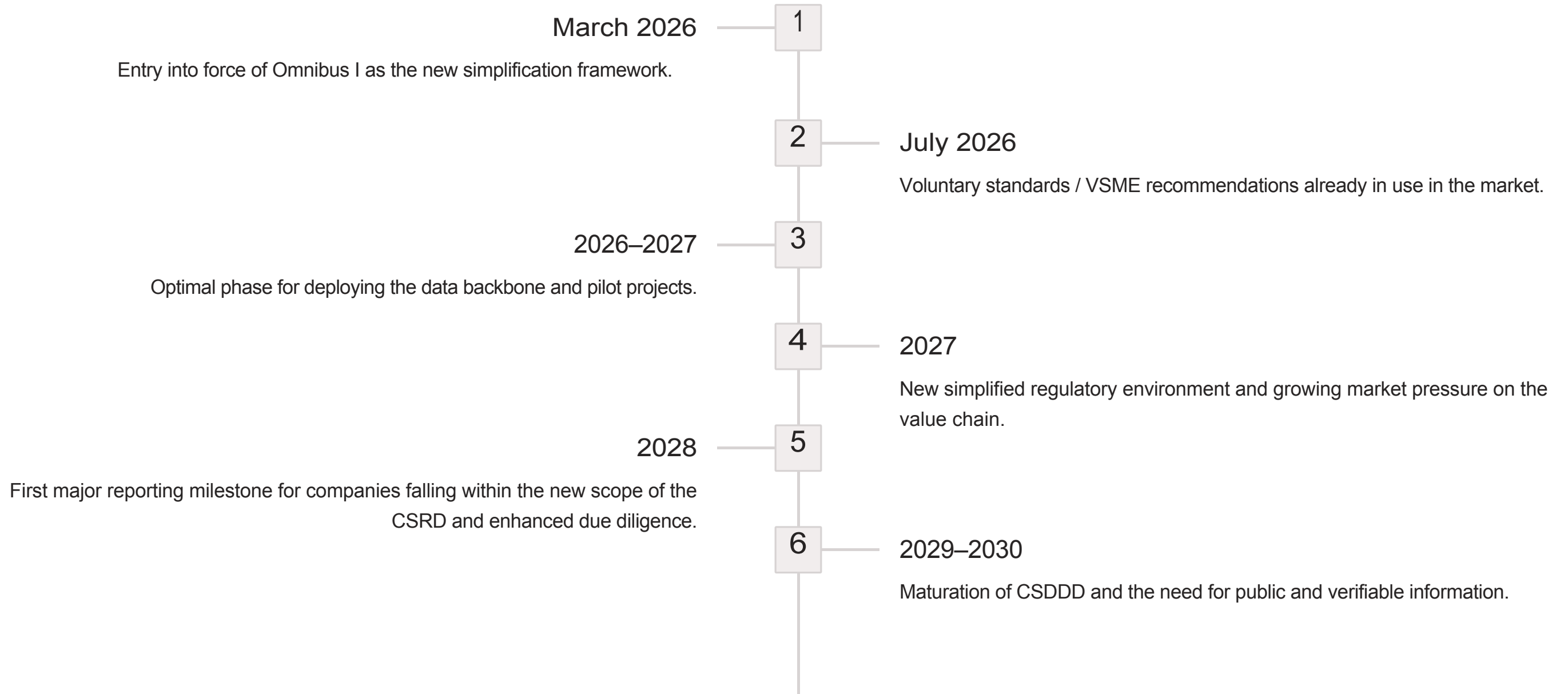
- Estimated reduction in physical samples
- Reduction in time taken to prepare data sheets/dossiers
- No. of products with DPP-ready data pack
- number of companies with certifiable readiness
- number of EPR/eco-tax simulations carried out
- number of eco-design decisions supported by data

Scaling KPIs

- No. of regions/replicating entities
- No. of transferable cases
- Post-FSTP sustainability plan approved

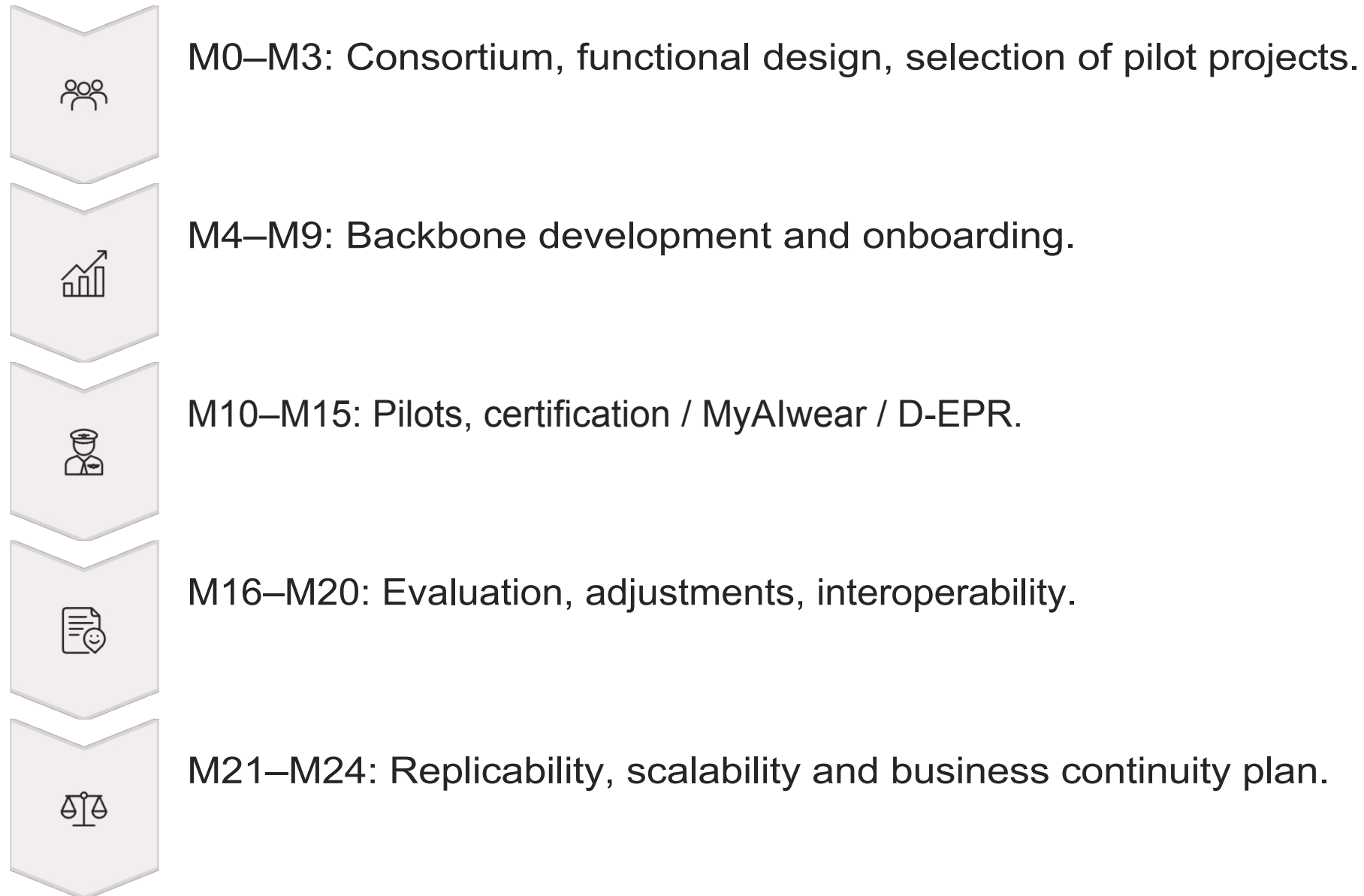
Strategic timeline 2026–2030

As the official call for proposals has not yet opened, it is advisable to present a two-part timeline: **project implementation** and **regulatory windows**.



Implementation proposal

The project is structured into 5 implementation phases over 24 months.



Why Madrid+d should support it

Because it turns European priorities into real sectoral capacity. It is not an awareness-raising project. It is a transition infrastructure.



Three things that rarely go together

Regulatory compliance · Operational utility for SMEs · Potential for European scaling.



Part of existing assets

DPP and evidence engine · Digital eco-design pilots with MyAIwear · The economic rationale behind DRAP.



Positions Madrid

As a key hub in the circular and digital transformation of the Spanish fashion sector.



Closing / final request

Request to Madrid+d

To promote this pre-proposal as a flagship project for Madrid's fashion and textile ecosystem within RIVCircular, facilitating:

- Technical checks prior to the official opening.
- Liaison with interregional partners.
- Fine-tuning of thematic alignment.
- Support for the consortium and final dossier.

From declarative sustainability to verifiable data. From regulatory obligation to sectoral competitive advantage.

