

# COMPLIANCE HANDBOOK

**For Key Export Markets**

**Policies, Regulations, & Conventions  
Requirements**

**2025**

# The European Market

Pakistan's exports to the EU 27 stood at €8.3 billion in 2024, up from €4.3 billion in 2014. However, Pakistan's share in the EU 27 import basket remained unchanged at 0.3% during this period. To increase its share in this market, Pakistan must produce compliant, customized, and competitive products<sup>1</sup>. Therefore, compliance with GSP+ conventions, EU supply chain requirements such as the Eco-design for Sustainable Products Regulation (ESPR), and adherence to human rights and environmental due diligence standards under the CSDDD and CSRD are crucial.

## Ratification Status of GSP+ Conventions

**Entered into force: 1<sup>st</sup> January 2014**

Under the EU's GSP+ regime, beneficiary countries are required to ratify and effectively comply with 27 international conventions on human rights, labor rights, good governance, and the environment, which are also subject to a biennial review by the EU mission to evaluate Pakistan's progress in implementing these conventions and to maintain access to preferential trade benefits. The most recent mission was conducted in June 2022, with another planned for November 2025. These missions involve meetings with Pakistani officials to review progress and identify areas needing improvement.

In human rights, Pakistan has ratified seven conventions, including the Genocide Convention (1957), the Convention on the Rights of the Child (1990), and key international covenants on civil, political, economic, social, and cultural rights. In labor rights, eight conventions have been ratified, covering freedom of association, collective bargaining, forced and child labor, equal remuneration, and non-discrimination. For environmental protection, Pakistan has ratified eight conventions, including the Montreal Protocol, the Basel Convention, the Convention on Biological Diversity, and the Kyoto Protocol. In good governance, four conventions have been ratified, including UN conventions on narcotic drugs, psychotropic substances, illicit drug trafficking, and anti-corruption measures.

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<sup>1</sup> <https://www.brecorder.com/news/40380783/exports-running-on-borrowed-time>

<b>Ratification Status of GSP+ Core Conventions by Pakistan</b>	
<b>Convention</b>	<b>Accession / Ratification</b>
<b>Human Rights   Number of Conventions Ratified = 7</b>	
Convention on the Prevention and Punishment of the Crime of Genocide (1948)	1957
International Convention on the Elimination of All Forms of Racial Discrimination (1969)	1966
International Covenant on Civil and Political Rights (1976)	2010
International Covenant on Economic, Social and Cultural Rights (1976)	2008
Convention on the Elimination of All Forms of Discrimination against Women (1981)	1996
Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (1987)	2010
Convention on the Rights of the Child (1990)	1990
<b>Labor Rights   Number of Conventions Ratified = 8</b>	
Freedom of Association and Protection of the Right to Organize Convention, 1948 (No. 87)	1951
Right to Organize and Collective Bargaining Convention, 1949 (No. 98)	1952
<b>Forced Labour Convention, 1930 (No. 29)</b>	<b>Convention: 1957 / Protocol: not ratified</b>
Abolition of Forced Labor Convention, 1957 (No. 105)	1960
Minimum Age Convention, 1973 (No. 138)	2006
Worst Forms of Child Labor Convention, 1999 (No. 182)	2001
Equal Remuneration Convention, 1951 (No. 100)	2001
Discrimination (Employment and Occupation) Convention, 1958 (No. 111)	1961
<b>Environmental Rights   Number of Conventions Ratified = 8</b>	

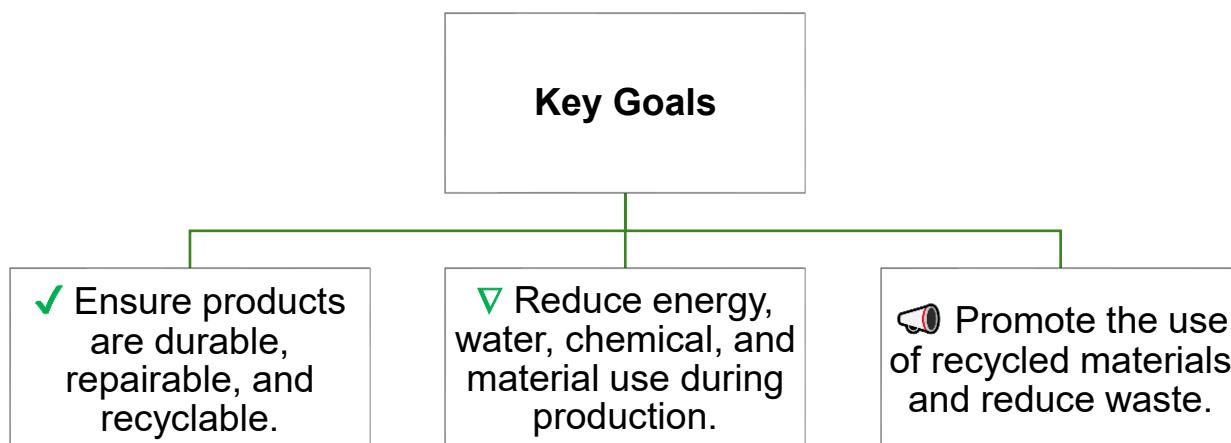
<b>Ratification Status of GSP+ Core Conventions by Pakistan</b>	
<b>Convention</b>	<b>Accession / Ratification</b>
Convention on International Trade in Endangered Species of Wild Fauna and Flora (1973)	1976
Montreal Protocol on Substances that Deplete the Ozone Layer (1987)	1992
Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal (1989)	1994
Convention on Biological Diversity (1992)	1994
United Nations Framework Convention on Climate Change (1992)	1994
Cartagena Protocol on Biosafety (2000)	2009
Stockholm Convention on Persistent Organic Pollutants (2001)	2008
Kyoto Protocol to the United Nations Framework Convention on Climate Change (1998)	2005
<b>Good Governance   Number of Conventions Ratified = 4</b>	
United Nations Single Convention on Narcotic Drugs (1961)	1999
United Nations Convention on Psychotropic Substances (1971)	1977
United Nations Convention against Illicit Traffic in Narcotic Drugs and Psychotropic Substances (1988)	1991
United Nations Convention against Corruption	2007

**Source: GSP Hub**

# Eco Design for Sustainable Products Regulation

Entered into force: 18 July 2024

The Eco-design for Sustainable Products Regulation (ESPR) replaces the Eco-design Directive 2009/125/EC and establishes a comprehensive framework for setting eco-design requirements on specific product groups. Unlike the previous directive, which applied only to energy-related products, the ESPR extends its scope to cover almost all physical products, with limited exemptions such as food, feed, and medicinal products. It also expands the range of eco-design requirements to include aspects such as durability, repairability, recyclability, circularity, and the overall reduction of the environmental and climate footprint of products.



## Impact on Pakistan's Textile Exports

Textiles, particularly garments and footwear, are among the first batch of products required to comply with the ESPR by April 2025, while official reporting will begin in 2027. This means Pakistani textile exporters must ensure their products meet recyclability, durability, and eco-design standards within this period. Additionally, exporters will be required to provide supply chain data through the Digital Product Passport (DPP) to demonstrate transparency, sustainability, and traceability across the value chain.

## Digital Product Passport (DPP)

The DPP, introduced under Article 8 of the ESPR, serves as a digital identity for products, components, and materials. It will store relevant information to support sustainability, promote circularity, and strengthen regulatory compliance. This information will be electronically accessible to consumers, manufacturers, and authorities, enabling better-informed decisions and allowing customs authorities to perform automatic checks on the authenticity of imported products.

### Information included in the DPP:

Product's technical performance

Materials and their origins

Repair activities

Recycling capabilities

Lifecycle environmental impacts

Water and energy usage

The product groups in the first priority batch that need to comply with ESPR are:

Iron and steel, Aluminum, Textiles (garments & footwear), Furniture, Tyres, Detergents, Paints, Lubricants, Chemicals, Energy-related products with eco-design requirements, ICT products & other electronics

### Implementation Timeline

By 19 April 2025, first batch of products required to comply with ESPR, including textiles

By January 2026: Delegated act on DPPs for textile and furniture will be published

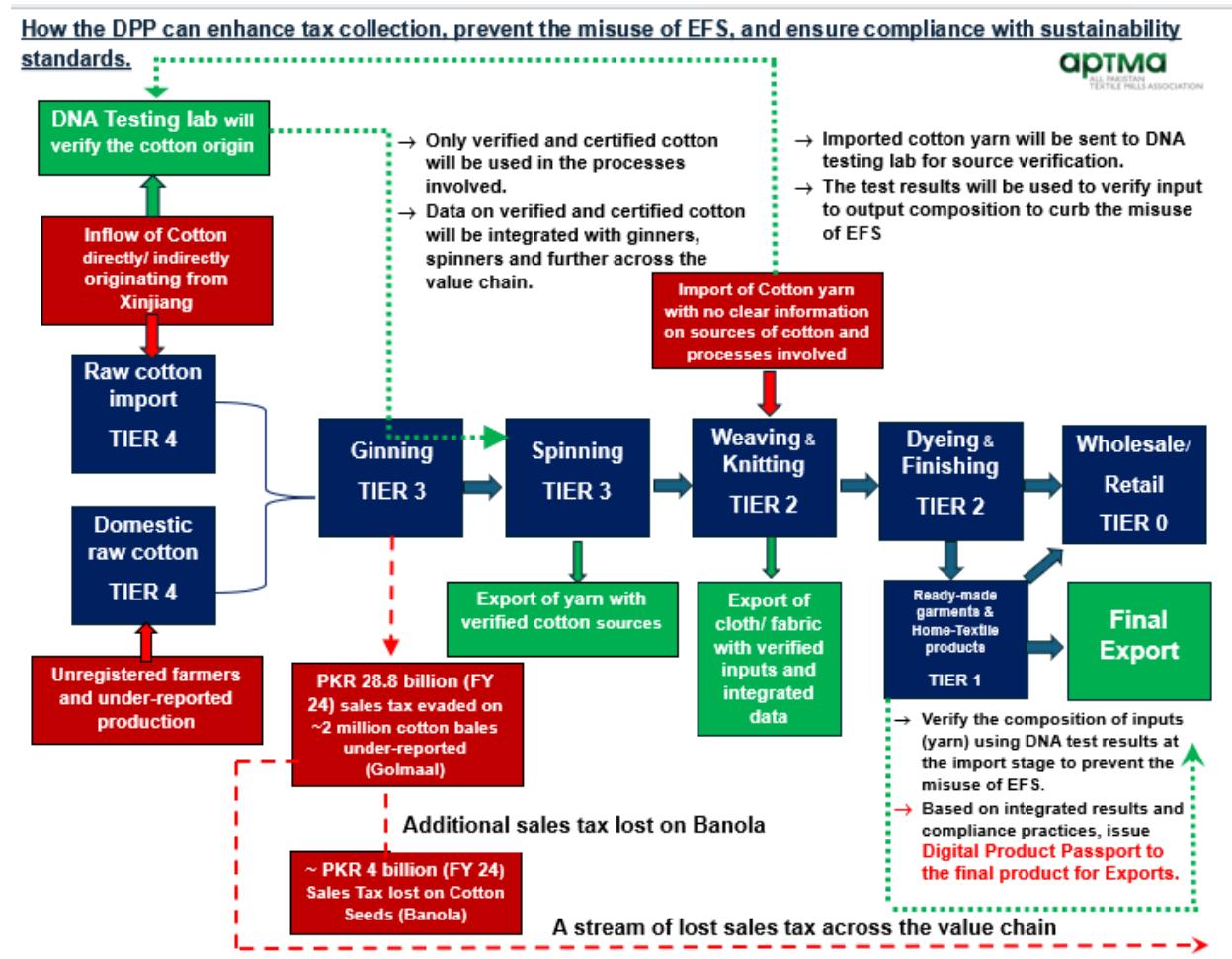
By July 2026: Digital registry to store unique identifiers of DPPs to be created by the European Commission.

By July 2027: Delegated Act on DPPs for textiles and furniture to enter into force.

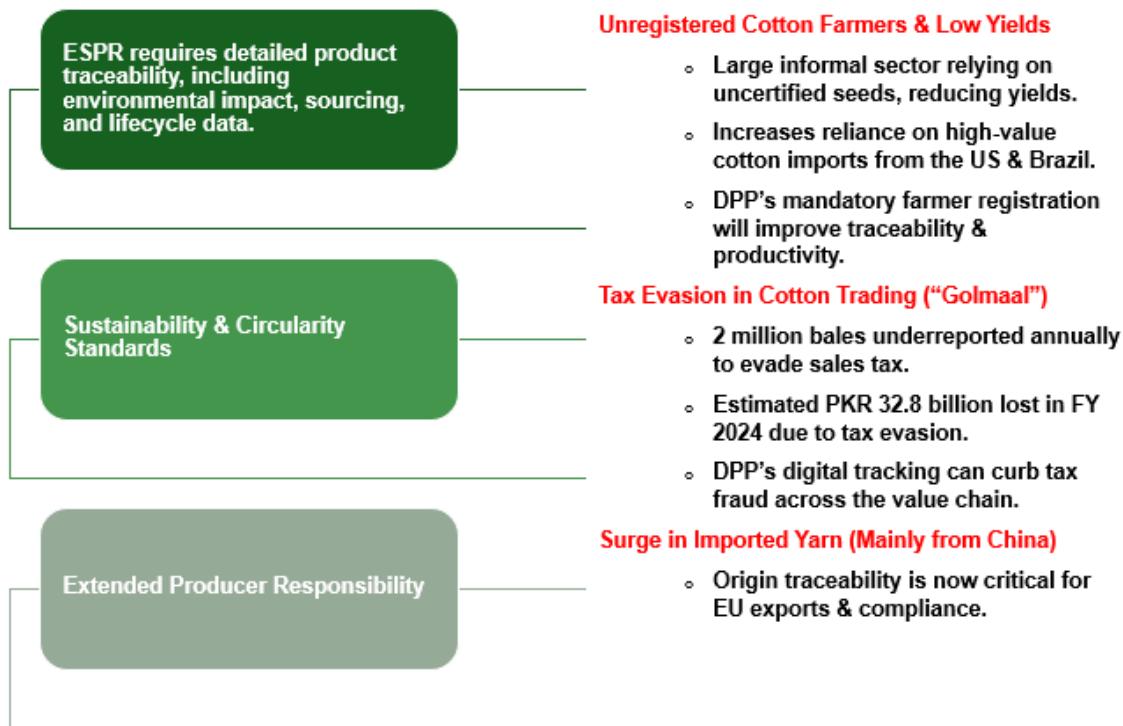
## Benefits of the DPP for the Textile Value Chain

To remain competitive in the EU market, Pakistan must secure a first-mover advantage by aligning its production processes and documentation systems with ESPR and DPP requirements. Early adaptation will ensure compliance and strengthen the country's position as a sustainable textile sourcing destination.

The following flow chart illustrates the textile value chain and highlights the need for effective implementation of the DPP.



<sup>2</sup> The EFS was being misused by a few players in the value chain, and its rules have now been amended in the Budget 2026. However, the flow chart serves as a visual representation of how effective implementation of the DPP can help prevent such leakages across the textile value chain.



## Proposed Framework for DPP: A Public-Private Partnership

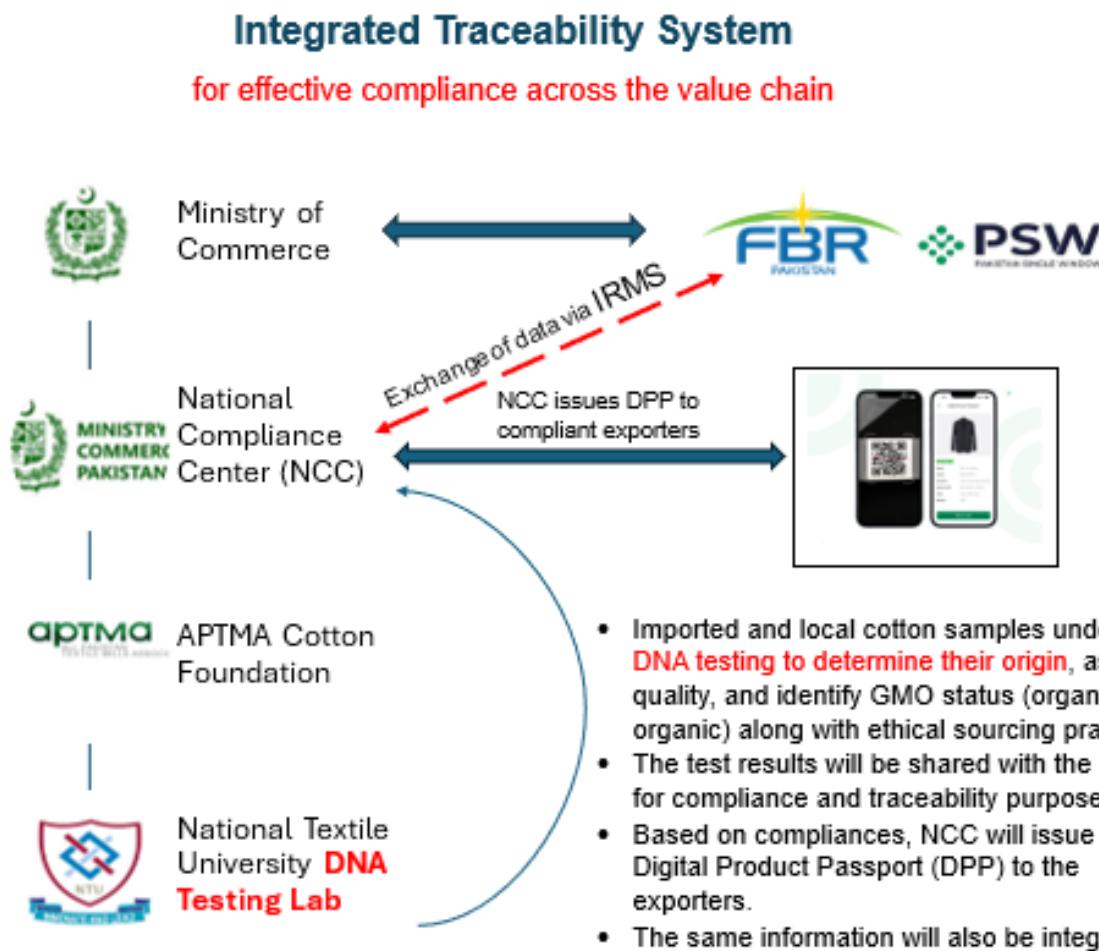
In response to evolving international buyer requirements, many Pakistani exporters have developed individual traceability platforms to enhance transparency. While commendable, the proliferation of QR code-based DPPs risks duplication of efforts, system fragmentation, and data security issues, despite significant investments in technical capacity and research.

Many countries are adopting either centralized national frameworks or public-private partnership (PPP) models. For example,

- Bangladesh: The government, in collaboration with BGMEA, is piloting a DPP system for textiles.
- China: A state-administered QR-based traceability system operates under central oversight.
- Germany: The government has partnered with GS1 to implement a digital traceability system aligned with its due diligence law (2023), designed to transition toward DPP compliance.

Considering these examples, the ideal way forward is to establish a DPP-compliant national traceability system in Pakistan through a PPP, supervised by the NCC. The framework should ensure traceability from Tier 4 (raw cotton) to Tier 0 (retail/export),

simplify compliance processes, and promote transparency across the value chain, including SMEs.



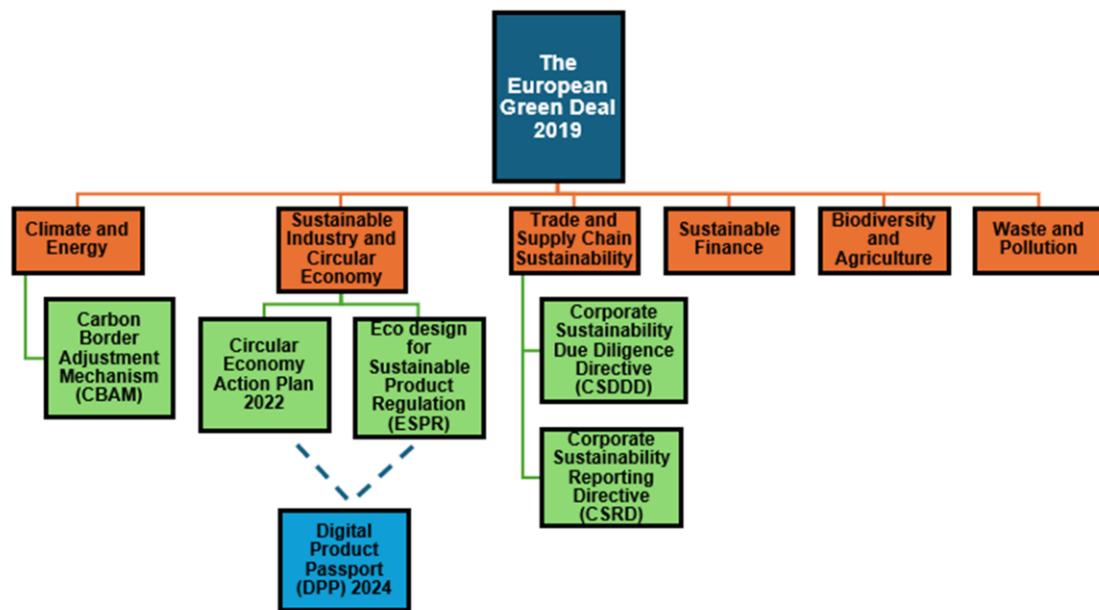
- Imported and local cotton samples undergo **DNA testing to determine their origin**, assess quality, and identify GMO status (organic/non-organic) along with ethical sourcing practices.
- The test results will be shared with the NCC for compliance and traceability purposes.
- Based on compliances, NCC will issue the Digital Product Passport (DPP) to the exporters.
- The same information will also be integrated with the FBR to facilitate the collection of **sales tax on Golmaal cotton bales and banola seeds**.

Traceability should be viewed as a strategic value addition to Pakistan's export ecosystem. Effective implementation would help curb underreporting, reduce tax evasion, and strengthen Pakistan's credibility as a responsible sourcing destination.

# EU Directives & Regulations under The European Green Deal

## Key EU Directives and Regulations Directly and Indirectly Impacting Businesses in Pakistan

**aptma**  
ALL PAKISTAN  
TEXTILE MILLS ASSOCIATION



## Corporate Sustainability Due Diligence Directive (CSDDD)

Entered into force: 25 July 2024

The Corporate Sustainability Due Diligence Directive (Directive 2024/1760) aims to foster sustainable and responsible corporate behavior within companies' operations and across their global value chains. It requires businesses to identify and address adverse human rights and environmental impacts of their activities both within and outside the EU, ensuring a uniform approach to responsible business conduct across member states. Therefore, any company outside the EU doing business with the EU company will also be required to comply with the CSDDD.

A European Network of Supervisory Authorities, established by the European Commission, will coordinate enforcement and ensure consistent application of CSDDD across EU member states.

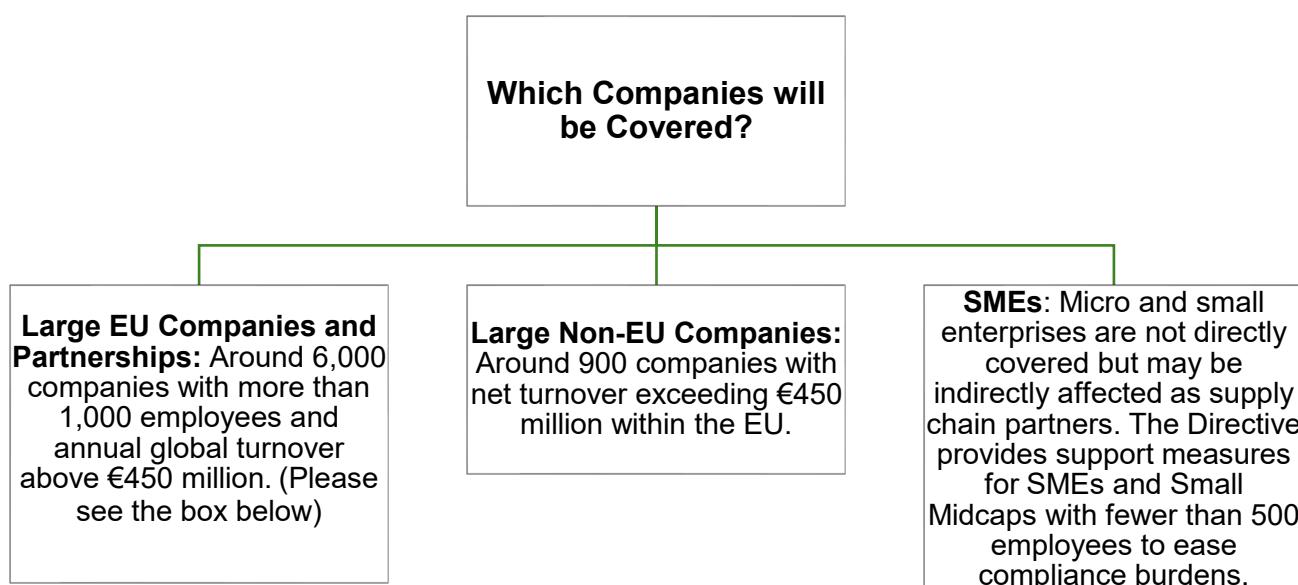


As compliance with the CSDDD is now an essential EU requirement, it offers leading Pakistani exporting companies nearing the billion-dollar mark an opportunity to strengthen their global standing by aligning with international sustainability standards. Given the fragmented nature of Pakistan's value chains, exporters must document due diligence on human rights and environmental practices across all tiers of production.

Since the DPP will record this due diligence, compliance with the CSDDD is a prerequisite. Exporters must demonstrate adherence to these standards throughout their supply chains, making transparent and traceable systems vital for sustained market access.

## Exporting businesses that comply with the CSDDD will gain the following advantages:

- The CSDDD serves as a prerequisite for the DPP. Establishing due diligence reporting and documentation will enable Pakistani textile exporters to seamlessly integrate their data into the DPP system.
- Given Pakistan's fragmented textile value chain, the CSDDD provides a harmonized compliance framework aligned with EU sustainability standards, ensuring legal certainty and a level playing field across all tiers of production.
- Compliance with the CSDDD will strengthen EU buyers' confidence and enhance brand reputation for Pakistani exporters in other international markets.
- The EU has long been a global advocate of human rights, promoting these values through trade agreements and multilateral cooperation. Strengthening management of human rights, labor, and environmental risks will also help Pakistan meet GSP+ requirements and reduce the reputational risk of losing this status.
- Compliance will improve competitiveness, risk management, and resilience, especially for exporters integrated into EU value chains.
- The Directive is designed to encourage innovation in cleaner and more efficient production. As Pakistan continues to face energy crisis, it is crucial to revisit the energy system through the buyer's lens, aligning it with sustainability expectations.



## The Omnibus Package: What Pakistan Needs to Know

On 26 February 2025, the European Commission proposed a package of measures to simplify EU rules on sustainability reporting, due diligence including the Corporate Sustainability Due Diligence Directive (CSDDD), sustainable finance, the EU Taxonomy, and the Carbon Border Adjustment Mechanism (CBAM). The package aims to deliver over €6 billion in administrative relief by reducing compliance burdens, especially for smaller companies, and enhancing EU competitiveness.

A key feature of this package is the “Stop the Clock” directive, which delays the implementation of certain sustainability and due diligence obligations:

- Postpones the entry into force of some Corporate Sustainability Reporting Directive (CSRD) requirements by two years.
- Delays the first phase of the CSDDD for the largest companies by one year, now effective in 2028. (Omnibus package for CSDDD has not been approved as of November 2025).
- The Commission also proposed narrowing the scope of companies subject to these rules, with only large companies meeting higher thresholds remaining in scope for the CSRD.

### Implications for Pakistan

The Omnibus Package provides additional time for non-EU suppliers, including those in Pakistan, to align with evolving sustainability and due diligence requirements. However, the overall direction of EU policy remains unchanged, as companies supplying into the EU will continue to face stringent compliance expectations on human rights, environmental protection, and traceability.

#### For Pakistani exporters, this means:

- Use the extended timeline to strengthen due diligence, documentation, and traceability systems, aligning with the Digital Product Passport (DPP) and related frameworks.
- Monitor which buyers and supply chain partners fall under the revised EU thresholds to prioritize compliance support accordingly.
- Understand that even if fewer companies are directly in scope, compliance expectations across value chains remain, and exporters risk losing market access if they cannot demonstrate adherence to sustainability and due diligence requirements.

## Next Steps for Pakistan

Pakistani units must identify and address labor rights issues in their supply chains for reporting under the CSDDD and DPP.

Although many textile businesses are signatories to the net zero carbon target by 2050, tangible steps are needed to account for, record, and report Scope 1 (Direct emissions), 2 (Indirect energy emissions), and 3 (Value chain) emissions at the national level.



Pakistan's industrial emissions have been rising at an average annual rate of 5.3 percent, reflecting growing carbon intensity in domestic production. A significant share of emissions is also embedded in imported raw materials and intermediates, as Pakistan increasingly depends on imported inputs for its textile exports, making it a net importer of emissions compared to others in the region.

To comply with the CSDDD and DPP, Pakistani businesses should:

- Adopt and implement a climate transition plan aligned with the Paris Agreement's 2050 neutrality goal and the European Climate Law's targets.
- Develop national energy and emissions reporting protocols for textile firms, standardizing data on electricity, gas, coal, renewables, and carbon intensity.
- Collaborate with energy efficiency firms to create digital tools for measuring production and transport-related emissions, monitoring PM2.5 particulate matter from coal and vehicles and integrating data into a national traceability platform.

- Set energy efficiency benchmarks for textile sub-sectors to track and improve performance.
- Promote renewable energy adoption linked with GHG reduction targets.
- Support third-party verified data systems to ensure credibility for international buyers.
- Demonstrate DPP-ready energy and emissions reporting in textiles by mid-2026.

## The U.S. Market

The United States accounts for about 15 percent of global textile demand (which is valued at USD 795.4 billion) second only to the EU 27. It is also the largest single market for Pakistan's exports, representing over 18 percent of the total. Similar to the EU, Pakistani exporters must comply with U.S. regulations, standards, and rules of origin to maintain market access.

Recently, following reciprocal tariffs on its trading partners, the U.S. has revised its rules of origin, reshaping and redefining the effective tariff rates faced by textile exporting countries. The rules of origin can be monitored through traceability, which has long been part of U.S. textile regulations, most notably under the Textile Fiber Products Identification Act, which mandates accurate labeling of fiber content and origin.

These requirements are now being reinforced through digital tracking and verification by the U.S. Customs and Border Protection (CBP), ensuring greater transparency and accountability across supply chains. In recent years, the U.S. has not only raised tariffs but also tightened non-tariff measures, making compliance with traceability and sustainability regulations essential for retaining market share.

### Textile Fiber Products Identification Act (15 U.S.C. § 70)

This is one of the oldest yet most significant U.S. laws affecting textile-exporting economies, as it governs every shipment entering the American market. Enacted in 1958 under Public Law 85-897 and effective from 1960, the Textile Fiber Products Identification Act aims to protect both consumers and genuine textile producers by ensuring transparency in the labeling, advertising, and invoicing of textile fiber products. The Act applies broadly to fibers, yarns, fabrics, and household textile articles made wholly or partly of textile fibers, excluding wool products, which are regulated separately under the Wool Products Labeling Act.

**Where the term “textile fiber product” means:**

**any fiber, whether in the finished or unfinished state, used or intended for use in household textile articles;**

**any yarn or fabric, whether in the finished or unfinished state, used or intended for use in household textile articles; and**

**any household textile article made in whole or in part of yarn or fabric;**

## **Major obligations & prohibitions under the Act**

### **§70a – Misbranding and False Advertising Declared Unlawful**

This section makes it unlawful to manufacture, advertise, sell, or import any textile fiber product into the U.S. that is misbranded or falsely advertised. For Pakistani textile exporters, this means all fiber content, labeling, and marketing claims must be truthful and compliant with U.S. regulations. Any deceptive labeling or advertising is treated as an unfair trade practice under the Federal Trade Commission (FTC) Act.

### **§70b – Misbranded and Falsely Advertised Textile Fiber Products**

This section outlines what constitutes “misbranding.” A textile product is misbranded if its fiber content, percentages, or origin are inaccurately labeled or omitted. Pakistani exporters must ensure that every exported product to the U.S. specifies:

- Each fiber's generic name and its weight percentage (if ≥5%)
- The manufacturer's or importer's registered name or identification number
- The country of origin (“Made in Pakistan”); and
- Accurate labeling placement (typically inside the neck or another conspicuous location).

Failure to include or falsify this information is deemed deceptive advertising, and any packaging that obscures required labeling is also prohibited.

### **§70c – Removal of Stamp, Tag, Label, or Other Identification**

It is unlawful to remove, mutilate, or alter any required label or tag before the textile product reaches the final consumer. If Pakistani exporters ship goods to the U.S., their U.S. distributors or retailers cannot remove or replace labels unless the substitute label meets all original FTC requirements and identifies the entity making the substitution. Breaking packages and selling untagged items also require re-labeling each item individually with complete information.

### **§70d – Records**

Manufacturers must maintain accurate records [for at least three years](#) detailing the fiber content of all textile products they produce or relabel. For Pakistani exporters, this implies maintaining verifiable documentation of fiber composition and shipment labeling, and this is where the digital verification such as the DPP plays its role. Failure to maintain such records constitutes an unfair and deceptive practice under the FTC Act and may expose the exporter or importer to enforcement action.

### **§70e – Enforcement**

The Federal Trade Commission enforces the Act under the same powers granted to it by the FTC Act. It can make rules, conduct inspections, and test imported products for compliance. For Pakistani exporters, this means their textile shipments to the U.S. can be [randomly tested or inspected by the FTC](#) for label accuracy, fiber composition, and origin claims. Non-compliance can lead to penalties and import restrictions.

### **§70f – Injunction Proceedings**

If the FTC believes an exporter or importer is violating or about to violate labeling or recordkeeping obligations, it may seek an injunction in U.S. courts to halt those actions. For Pakistani exporters, this underscores the seriousness of compliance - as injunctive orders can immediately suspend import activities until the matter is resolved.

### **§70g – Exclusion of Misbranded Textile Fiber Products**

All textile products imported into the U.S. must comply with §70b labeling requirements and have corresponding information on invoices filed with U.S. Customs. Any false or missing information on invoices or declarations constitutes an unfair trade practice and may result in exclusion of goods at the border. Pakistani exporters must therefore ensure that customs documentation (especially fiber composition and country of origin) matches product labeling exactly to avoid shipment rejections or penalties. This can only be done through real time traceability in Pakistan's textile value chain.

## **§70h – Guaranty**

Exporters can avoid liability if they possess a valid guaranty from a U.S.-based manufacturer, importer, or distributor stating that the textile product is not misbranded or falsely labeled. However, furnishing a false guaranty - even in reliance on another false one - is unlawful. Pakistani exporters should ensure all guarantees of compliance with U.S. labeling standards are obtained and verified through trusted partners.

## **§70i – Criminal Penalty**

Any willful violation of labeling, recordkeeping, or advertising obligations under §§70a, 70c, 70d, 70g, or 70h(b) can result in criminal penalties - fines up to USD 5,000 and imprisonment up to one year. For textile exporters, deliberate mislabeling of fiber content or country of origin may expose both the importer and exporter to criminal prosecution under U.S. law.

## **§70j – Exemptions**

Certain textile articles are exempt from labeling requirements, such as upholstery stuffing, structural linings, sewing threads, footwear textiles, handbags, and toys, unless fiber content is specifically claimed. Pakistani exporters should confirm whether their product categories fall within these exemptions before assuming compliance is unnecessary.

## **§70k – Application of Other Laws**

This section clarifies that the Textile Fiber Products Identification Act supplements, rather than replaces, other U.S. laws. For Pakistani exporters, this means compliance with the Act does not exempt them from other labeling or trade laws such as those under Customs, consumer safety, or environmental regulations.

## The need for a DPP and digital rules-of-origin certification

### **“§ 70g. Exclusion of misbranded textile fiber products:**

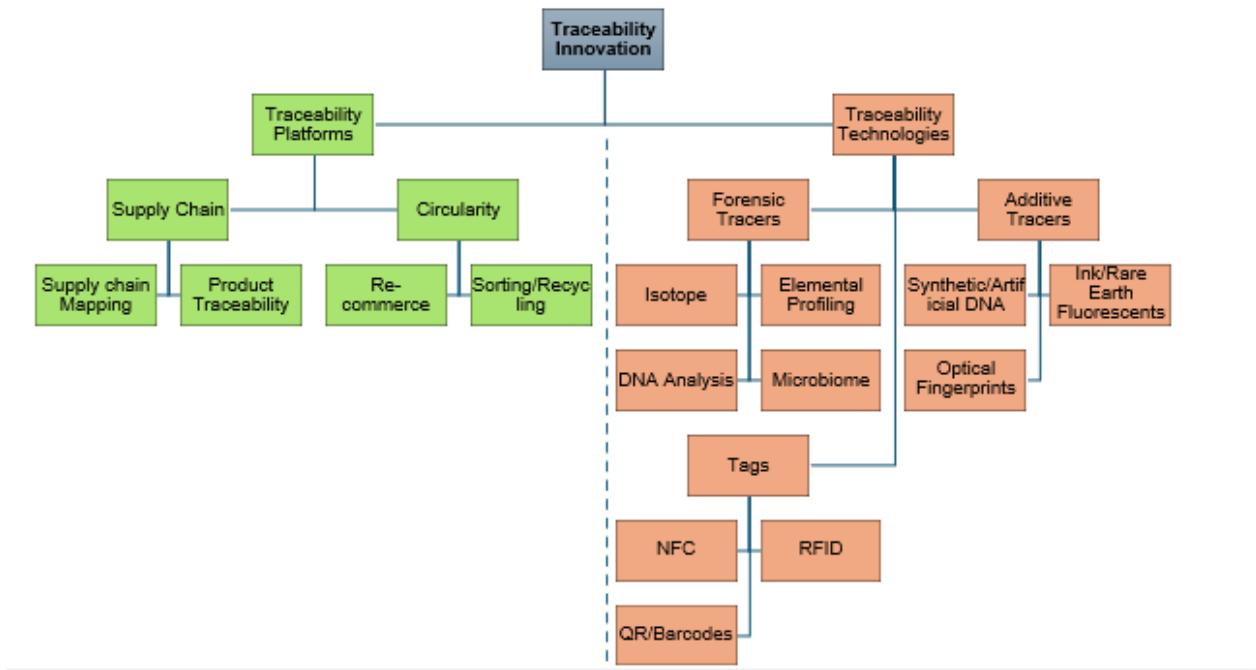
All textile fiber products imported into the United States shall be stamped, tagged, labeled, or otherwise identified in accordance with the provisions of section 70b of this title, and all invoices of such products required pursuant to section 1484 of title 19, shall set forth, in addition to the matter therein specified, the information with respect to said products required under the provisions of section 70b(b) of this title, which information shall be in the invoices prior to their certification, if such certification is required pursuant to section 1484 of title 19. The falsification of, or failure to set forth the required information in such invoices, or the falsification or perjury of the consignee's declaration provided for in section 1485 of title 19, insofar as it relates to such information, is unlawful, and shall be an unfair method of competition, and an unfair and deceptive act or practice, in commerce under the Federal Trade Commission Act (15 U.S.C. 41 et seq.); and any person who falsifies, or perjures the consignee's declaration insofar as it relates to such information, may thenceforth be prohibited by the Commission from importing, or participating in the importation of, any textile fiber product into the United States except upon filing bond with the Secretary of the Treasury in a sum double the value of said products and any duty thereon, conditioned upon compliance with the provisions of this subchapter. A verified statement from the manufacturer or producer of such products showing their fiber content as required under the provisions of this subchapter may be required under regulation prescribed by the Secretary of the Treasury. “

*-The Textile Products Identification Act- 15 U.S.C. § 70, Federal Trade Commission, Government of the United States*

[https://www.ftc.gov/legal-library/browse/rules/textile-products-identification-act-text?utm\\_source=chatgpt.com#70a](https://www.ftc.gov/legal-library/browse/rules/textile-products-identification-act-text?utm_source=chatgpt.com#70a)

## A Special Section on Traceability and Tracer Technologies

Traceability in the fashion and textile industry across the globe can be categorized into two overarching groups



### Overview of Traceability Technologies

- Traceability platforms encompass supply chain mapping and product traceability, as well as circularity initiatives.
- The technologies employed for traceability include forensic and additive tracers.
- Forensic tracers are widely used because they provide robust evidence for compliance with legal requirements.
- Tags, such as barcodes and RFID, differ from forensic tracers (like isotopic and DNA tracers)
- Barcodes and RFID are primarily used for identification and tracking purposes, while forensic tracers (isotope and DNA) are utilized to verify the authenticity and origin of materials.

## Difference in Traceability Platforms

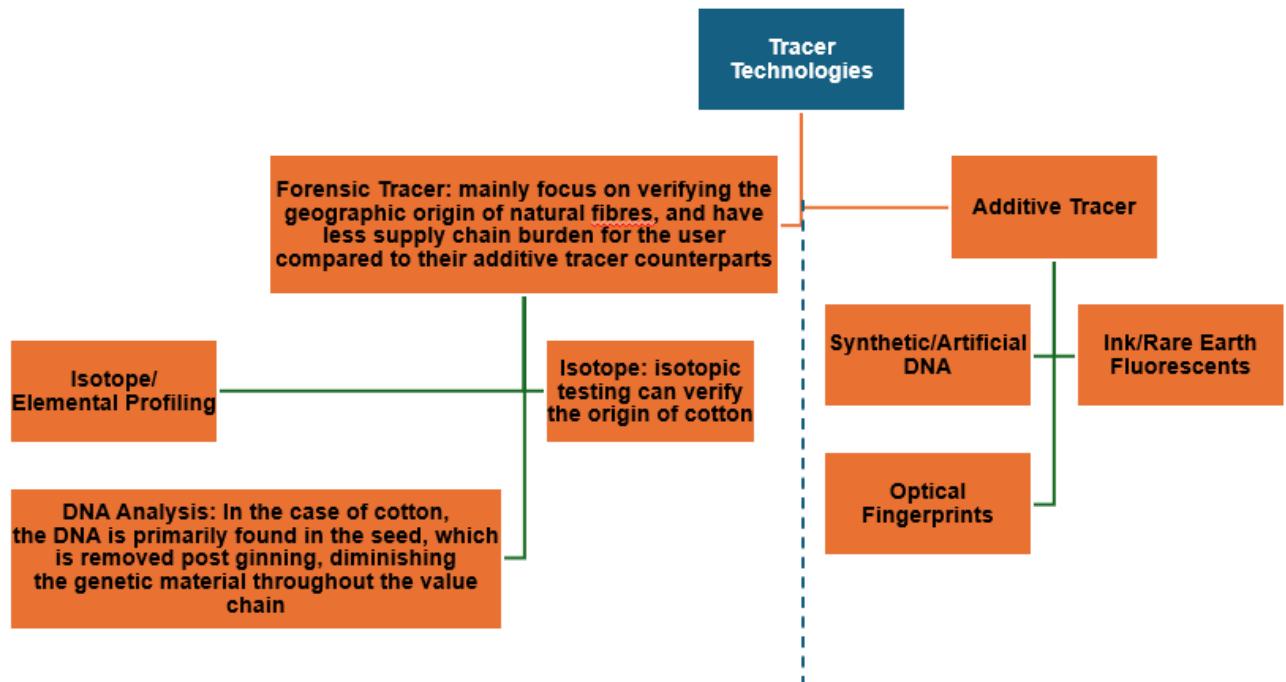
Traceability Platform	Aim	Definition	Advantage
Supply Chain Mapping	Discovery	Supply chain mapping is the process of engaging with direct suppliers to discover indirect suppliers, resulting in an understanding of the end-to-end supply chain for a material, a product, or a brand.	Ensuring compliance with workers' rights, women rights, human rights and environmental claims.
Traceability	Assurance	Supply chain traceability is the process of tracking every commercial transaction in the end-to-end supply chain to account for the time and place where every step occurred in the supply chain of a unit, batch or lot of finished good.	Committing to supply chain traceability is usually the most effective way to promote exporters beyond conventional markets. Also, implementation of DPP can enhance transparency and as a result can strengthen suppliers' credibility.  Traceability is becoming essential not only in textiles but also across various sectors, including pharmaceutical serialization and US FDA food safety regulations.
Transparency	Disclosure	Supply chain transparency is the process of disclosing suppliers to private customers and/or public consumers.	Builds buyer confidence and brand value through openness about sourcing and production practices. Reinforces Pakistan's positioning as a responsible

		supplier amid growing global demand for sustainable and ethical production.
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## Current Traceability Initiatives in Pakistan

- Better Cotton Initiative
- Loop Trace
- Fiber Trace
- Several textile manufacturing companies have adopted these tracer technologies
- However, without making the traceability system a mandatory legal requirement across the value chain and designating a single regulatory authority, efforts to enhance digitization at the national level will remain ineffective.
- A public private partnership under the umbrella of the NCC is the best possible solution.

## Tracer Technologies



## Difference in Tracer Technologies



**Forensic Tracers:** Forensic tracers are innovations that analyze the biochemical composition of fibers, materials, and/or garments **through micro-particle analysis of isotopic ratios, DNA structures, and elemental models**. This analysis is used to **validate geographic origins via scientific methodologies**. The methodologies aim to cross-reference the biochemical composition of samples taken from the supply chain against predetermined and verified provenance databases to ensure traceability validation. The focus on verifying the geographic origin of natural fibers, and have less supply chain burden for the user compared to their additive tracer counterparts



**Additive Tracers:** Additive tracers are innovations that involve applying a tracer substance to fibers, materials, and/or garments on the supply chain floor, which can then be detected later in the supply chain to validate origin. Examples of application mechanisms include spraying mists, applying liquid inks and pigments, printing nano-invisible inks, and printing digital serialization markings onto product labels and fabric rolls.

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