

# EuRIC position on EPR schemes for textiles

Nowadays, our clothes are discarded and replaced by new items faster than ever before. According to a report published by the European Environment Agency (EEA)<sup>1</sup>, Europeans have purchased more clothing for less money over recent years due to the fast fashion phenomenon which promotes increased consumption and reduces the life span of clothing. For example, in Bulgaria the quantity of new textile products and footwear placed on the market has increased by about 122% in seven years<sup>2</sup>.

The fast fashion trend, combined with the separate collection requirement for textiles by 2025 will automatically further increase the number of textiles collected. Currently, the collection of textiles is financed by revenues generated by the preparation for re-use and the marketing of second-hand textiles<sup>3</sup>. However, in the future with an increase of separately collected textiles and a further drop in quality – due to lower quality products placed onto the market originally – the revenues generated will not be sufficient to cover all costs associated with the collection, sorting and recycling. Therefore, it is essential that markets for and the use of recycled textiles' fibers are developed resp. incentivized while the markets for second-hand clothing are being maintained.

Setting up Extended Producer Responsibility (EPR) in the field of textiles for producers and importers of new clothing, in line with the minimum requirements set in the Waste Framework Directive<sup>4</sup>, would be welcomed by the textiles' re-use and recycling industry only if it helps bridging the design and the end-of-life treatment stages. EPR should also support the existing system of re-use which is the largest activity of the textile recycling industry as well as the demand for recycled fibers.

## Scope

EPR schemes should cover in scope not only used textiles such as used clothes, bed linen and tablecloths but also used shoes as they are normally collected and processed via the same channels.

Whenever EPR is implemented, EuRIC supports in particular the modulation of fees paid by producers to schemes rewarding textiles' reusability, recyclability, recycled content and innovation to bridge the design with the end-of-life treatment stage.

EuRIC supports in practice the modulation of fees in EPR schemes that:

- ❖ Reward textiles that are suitable for prolonged use, contain recycled content (preferably from textiles as opposed to other sources like PET-bottles etc.), that are technically durable and at their end-of-life stage suitable for re-use and recycling;
- ❖ Encourage the design of materials and articles for durability and eventually fiber to fiber recycling in order to reduce the environmental impact and the generation of waste;
- ❖ Support the development of new processes and recycling technologies with the aim of recycling at a high beneficial level (in particular fiber to fiber recycling).

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<sup>1</sup> <https://www.eea.europa.eu/publications/textiles-in-europes-circular-economy>

<sup>2</sup> Denkstatt Bulgaria – Regulatory Impact Assessment of EPR for Shoes and Textiles in Bulgaria (Extended Summary Report)

<sup>3</sup> <http://textile-zukunft.de/wp-content/uploads/2014/10/EPR-f%C3%BCr-Textilien-Diskussionspapier-der-GftZ-27.11.2019.pdf>

<sup>4</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:02008L0098-20180705>

EPR should particularly tackle market failures while avoiding to disrupt self-financing activities to ensure that the costs covered are adequately allocated not only to the costs of separate collection and sorting, but equally to pull end-markets and support innovation.

EuRIC calls in parallel for

- ❖ Harmonized re-use and recycling targets of on average 80%, out of which a minimum of 50% should stem from re-use and the rest from material reuse including textile fiber recovery and re-utilization;
- ❖ Harmonized definitions for example explaining when prepared for re-use or recycled fibers cease to be waste, which are key conditions to operate a true circular economy for textiles throughout Europe and globally;
- ❖ EPR governance schemes that guarantee neutrality or balance upon the market dynamics.

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**EuRIC** - The European Recycling Industries' Confederation - is the umbrella organisation for recycling industries. Through its Member Federations from 21 EU&EFTA countries, EuRIC represents across Europe over:

- 5,500+ companies generating an aggregated annual turnover of about 95 billion €, including large companies and SMEs, involved in the recycling and trade of various resource streams;
- 300,000 local jobs which cannot be outsourced to third EU countries;
- Million tons of waste recycled per year (metals, paper, glass, plastics, textiles, tyres and beyond);

By turning wastes into resources, recycling is the link which reintroduces recycled materials into the value chains again and again.

Recyclers play a key role in bridging resource efficiency, climate change policy and industrial transition.