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EuRIC updated position on EPR schemes for textiles

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In 2020, the volume of separate collected textiles in the EU-27 was estimated to be between 1.6 and 2.5 million tons (MT). What is currently a self-financing system through revenues generated by the preparation for re-use and the marketing of second-hand textiles[1] will drastically change in the future. For example, 87% of German collectors have reported an average decline in quality due to the increased presence of impurities or inferior quality of the textiles they receive[2]. It is therefore much needed to encourage the development of further markets for used textiles but also recycled fibres. One of the policy tools to strengthen the textile re-use and recycling market is an extended producer responsibility scheme (EPR) as introduced by the Waste Framework Directive 2008/98/EC (WFD). Extended producer responsibility schemes are a set of measures taken by Member States to ensure that producers of textiles would bear the financial responsibility for the management of the waste stage of the textile's life cycle.

1. Current & future market for textiles prepared for re-use

As of 2025, the market will have to be able to absorb higher incoming quantities as collection volumes are expected to grow even more rapidly when Member States begin to establish separate collection of textiles waste to fulfil the obligations of the revised WFD. It has been estimated that the collection across the EU will increase by 79% between 2018 and 2025, with an additional 2.1 MT collected, for which further sorting and recycling infrastructure as well as markets for second hand textiles and recycled raw materials will be needed[3]. Recently, China has also started to expand its market by becoming the fourth largest exporter of used clothing worldwide[4] which will put the European re-use market under additional pressure.

As highlighted in the Roadmap on the EU Strategy for Textiles[5], extended producer responsibility can play a major role in promoting sustainable textiles and treatment of textile waste in accordance with the waste hierarchy. Properly implemented EPR schemes would stimulate innovation as well as support the handling of the expected increased collection volumes.

Proper sorting of textiles is key and ensures that the largest possible amount of collected textiles can be prepared for re-use. There are several best practice sorting steps to be taken in order to prepare textile items for reuse:

- The first step in the sorting process (pre-sorting) is the separation of textiles suited for re-use on second hand markets from inferior quality textiles and residual materials. The **pre-sorting process** also aims at removing all non-textiles components (impurities) from the mixed collected goods and at separating the re-wearable items from those which are not.

- The subsequent **fine sorting phase** aims at producing defined qualities for subsequent marketing (based on fabric, state of the item and market demand) of second-hand textiles.

[1] GftZ: Hintergründe und Strategien zum Aufbau eines Systems für eine „Erweiterte Produzentenverantwortung für Textilien" (2019)
[2] Bvse Textilstudie (2020)
[3] Bünemann A. et al (2019): Erweiterte Produzentenverantwortung für Textilien; Fachtagung GftZ, 27.11.2019 in Berlin
[4] TRA – Extended producer responsibility on clothing and textiles (2020)
[5] Roadmap EU Strategy on Textiles (2021)

Preparation for reuse requires that each individual piece of used textile is manually checked and assessed by an expert sorter.

Following above-described procedure ensures that the items are reused to meet the needs of the market such as climate, fashion, color scheme and sizes. For fractions that cannot be reused, the sorting company ensures that those are properly recovered in suitable processes (e.g., recycling or thermal recovery).

2. Further development of fibre-to-fibre textile recycling markets

There are currently different kinds of **recycling technologies** available for textile waste, **including mechanical recycling, thermal recycling and chemical recycling**. However, less than 1% is currently recycled in a closed loop. Fibre-to-fibre recycling is either done via chemical recycling or mechanical recycling.

- Mechanical recycling is the most common used process through which pre-consumer textile waste and pre- and post-consumer textile waste are being mechanically fiberized and then spun to yarns to be used in the production of new textiles. These recycling technologies are currently commercial and used in the industry. Thermal recycling, another mechanical process, is less common and is describing the process where synthetic fibres are heated, melted and made into raw material for extrusion of new polymers.

- Further innovative technologies relying on chemical recycling enable further fields of recycling and a high quality fibre can be obtained with features like virgin fibres. This is not yet at a commercial scale, but many innovations and technologies are being developed reaching a level of maturity allowing their scaling up, as soon as market signals are put in place through legislation. The chemical recycling of cotton textile waste into viscous fibres for instance uses the viscous process known from the pulp and paper industry. Additionally, many technologies are looking into polyester-cotton blends and polyester fibers.

- Today, the recycled polyester fibres on the market are recycled polyester from PET bottles to polyester textile fibres for the industry.

- Currently there are still technical challenges including chemicals like dye stuff which cannot be removed and shortening of fibre lengths which makes it more difficult to spin yarns and to separate fibre types in products with fibre blends. Also, the construction of the garment can have an impact on the recycled fibre quality obtained. Further on the dismantling of all non-textile parts on textiles and clothing need to be removed in order to obtain high-quality recycled fibers, this is currently a labour intensive process.

3. Recommendations for scope & targets of an EPR scheme

EuRIC supports the initiation of an extended producer responsibility scheme for textiles in accordance with the minimum requirements of Article 8a of the WFD to ensure the establishment of a comprehensive system in the EU. This includes:

3.1. Scope

- An EPR scheme should cover **post-consumer clothing and home textiles** and be applicable to **producers and distributors** of products that are directly sold in the EU, including online sales.

- It must be forbidden to subject second-hand textiles to any EPR contribution, since it would amount to a double contribution imposed on the highest waste treatment option of the waste hierarchy.

- The overall EPR contribution should support **re-use and recycling activities** as well as **research & development and communication activities**. Only re-use and recycling businesses complying with industry standards such as sorting or collection specifications should be eligible to receive EPR contributions.

- To encourage manufacturers to produce more sustainable and better eco-designed products, **eco-modulated fee contributions** should be applied. The fee eco-modulation should encourage the design of more durable and resistant products as well as the use of recycled materials from post-consumer textiles.

- Producers, representatives of the end-of-life phase of textiles as well as other stakeholders must be involved in the **administration of an EPR scheme**.

3.2. Targets

- **Collection targets** must be realistic based on Member States' performances yet ambitious and being re-evaluated on a rolling basis.

- **Re-use and recycling of post-consumer textiles targets** should be 90% out of what is collected with at least 50% re-use and 30% recycling and max. 10% thermal recovery or disposal.

- **Recycled textile content**: All new textile products should contain 10% recycled textile content by 2025 and 25% recycled textile content by 2035 (max. 1/3 pre-consumer and 2/3 post-consumer).

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