

The textiles re-use & recycling industry welcomes the EU Strategy for Sustainable and Circular Textiles

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The European Recycling Industries' Confederation (EuRIC) welcomes the publication of the EU Strategy for Sustainable and Circular Textiles¹ creating conditions and incentives to reach a sustainable and circular textiles value chain by 2030.

The European textiles re-use and recycling industry is key to accelerate the transition towards a circular economy in textiles. Through preparation for re-use or recycling, the industry gives textiles a second life and saves resources, emissions and energy compared to the use of virgin textiles fibres. Additionally, it is a labor-intensive and local industry, relying on a wide variety of skilled professionals. When sorting post-consumer textiles, it is essential that the sorted items are fine-tuned to meet specific demands of second hand markets and subsequent recycling processes. This requires a multistage sorting process carried out by well-trained sorters led by in-depth knowledge of the markets for re-use and recycling². The automatization of this process is currently only very limited possible.

The EU Textiles Strategy recognizes many challenges that the textiles sector is currently facing. The identified solutions will provide opportunities for the whole industry if implemented properly. The European re-use and recycling industry will gladly provide support during this implementation process and would like to highlight the following:

Ecodesign Requirements

About 80% of products' environmental impact is determined at design stage. Still, the vast majority of products placed on the market are designed without any consideration for their end-of-life stage. Design for circularity is of paramount importance to move towards a circular economy and EuRIC strongly welcomes the emphasis placed on the introduction of mandatory ecodesign requirements for textiles.

In order to reduce the ecologic footprint of textiles and garments they need to be designed to be durable to extend their lifespan before entering the end-of-life phase and to be easy recyclable afterwards. Durability targets should consist of the expected lifetime (e.g., a minimum of 25 washing circles). For the subsequent recycling it is necessary that proven recycling technologies exist for the materials used.

In addition, textiles design should focus on the use of toxic-free materials and limit the release of microplastics throughout the textiles' life as much as possible.

¹ COM(2022) 141 final

² [Handling & Sorting Specifications - For re-use and recycling of used textiles \(2021\)](#)

Digital Product Passport

The introduction of a Digital Product Passport (DPP) to provide clear, structured and accessible information on the environmental sustainability characteristics of products can be beneficial for the reuse and recycling industry if properly implemented. The DPP must be easily and freely accessible ideally by using a RFID or Near-field communication technology in conjunction with an open database. It is important to note that the level of information will greatly differ between the textile reuse and textile recycling industry. For example, important information for the reuse industry includes brand name, year of production and certificates and for the recycling industry it would be for instance the material composition and presence of chemicals. EuRIC welcomes the introduction of a DPP in order to enhance traceability and transparency in the textiles value chain.

Extended Producer Responsibility

Extended Producer Responsibility (EPR) plays a major role in promoting sustainable textiles and treatment of textile waste in accordance with the waste hierarchy. Properly implemented EPR schemes stimulate innovation as well as support the handling and treatment of the expected increase of collection volumes. The largest effect can be achieved by a harmonized system across the different Member States in order to create an equal level playing field and to avoid fragmentation as well as concurrent objectives. EuRIC therefore strongly welcomes the intention to introduce harmonized EU extended producer responsibility rules for textiles with eco-modulation of fees, as part of the forthcoming revision of the Waste Framework Directive (WFD) in 2023.

As previously stated³, EuRIC supports the initiation of extended producer responsibility schemes 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. Eco-modulation of fees must be applied in order to encourage the design of more durable and resistant products as well as the use of recycled materials from post-consumer textiles. Additionally, EPR schemes should be combined with ambitious use and preparing for reuse targets, making sure that reuse is prioritized in accordance with the waste hierarchy.

Mandatory Recycled Content

Currently, the vast majority of raw materials used by the EU's industry do not come from recycling but from virgin materials. In order to reach a circular economy for textiles, the higher uptake of recycled textile fibre content will be one of the corner stones. We suggest that all new textile products should contain 10% recycled textile content from post-consumer textiles by 2025 and 25% recycled textile content from post-consumer textiles by 2035. This can even rise further with the expected increased establishment of more recycling technologies in Europe in the coming years.

³ [EuRIC Updated Position on EPR Schemes \(2021\)](#)

Export of Textile Waste

EuRIC strongly supports the initiative to establish specific EU level criteria to make a distinction between textile waste and certain second-hand textile products in order to avoid that waste is exported as second-hand product and thus escapes the waste legislation. However, it needs to be secured that the criteria are applied by all Member States in an equal way to maintain a level playing field.