



**Local & Regional
Europe**



**Co-funded by
the European Union**

Empowering Municipalities in Advancing Sustainable Textile Waste Management

Recommendations

Proposal for a revision of Directive 2008/98/EC on waste
October 2023

CEMR key messages

In view of the Commission's proposal published in July 2023 to revise the waste framework directive with a focus on textiles and food waste, the Council of European Municipalities and Regions (CEMR) put forward the following priorities

1. Refining the definition of textile waste
2. Clarifying the role of social enterprises
3. Extended Producer Responsibility (EPR) for textiles
 - Align deadlines for separately collected textiles and EPR scheme establishment to ensure timely compliance
 - Define and clarify the role of local public authorities in EPR scheme
 - Ensure a comprehensive cost coverage for the management of textile waste in EPR scheme
 - Include 'unsold textiles' to align with the Ecodesign Regulation for Sustainable Products
4. Introducing measures on the prevention of textile waste

Background

This policy paper scrutinizes the Commission's proposal to amend Directive 2008/98/EC on waste, with a specific focus on textiles. Recognizing the pivotal role of European local authorities and cities in achieving sustainable waste management objectives, the recommendations put forth by the Council of European Municipalities and Regions (CEMR) seek to refine and fortify the proposed legislative framework. Drawing inspiration from successful implementations, such as France's Extended Producer Responsibility (EPR) policy, this paper aims to elevate the discourse surrounding the sustainable management of textile waste.

As stated in the EU Strategy for Sustainable and Circular Textiles, Member States will be **obliged to implement the separate collection of textiles by 1st January 2025**. CEMR welcomes the legislative proposal on the revision of the waste framework directive, which introduces **mandatory and harmonised Extended Producer Responsibility (EPR) schemes for textiles** in all EU Member States. In line with the Polluter-Pay Principle, producers will cover the costs of management of textile waste.

Recommendations

CEMR suggest the following points for improvement of the directive:

- 1. Textile waste definition - Consider textile waste beyond household**

The proposal's exclusive use of the term 'household textiles' is inadequate, as it overlooks textiles from commercial and industrial sources. It includes apparel, clothing accessories, footwear, linens and upholstery, but omits used textiles and textile waste generated in hotels, hospitals, restaurants, offices, schools and suchlike. The term 'textiles' should be universally adopted, encompassing waste generated in diverse settings. By broadening the scope to include all textile waste, irrespective of its origin, the proposal aligns with the Polluter-Pay Principle.

2. Clarify the role of social enterprises under the waste legislation

Social enterprises engaged in textile waste management should adhere to the same regulations as conventional waste operators. Ensuring their inclusion in the EPR system guarantees equitable compensation, fostering collaboration in the broader textile recovery system.

3. Enhancing Extended Producer Responsibility (EPR) for Textiles

- a. Align deadlines for separately collected textiles and EPR scheme establishment to ensure timely compliance

Deadlines for the obligation of separately collected textiles and the deadline for the obligation to set up an extended producer responsibility scheme do not fit. We have concerns on the long adoption and transition period for EPR for textiles that would greatly exceed the separate collection deadline. Member States are obliged to collect textiles separately by 1 January 2025. However, according to the proposal, Member States would be obliged to establish an EPR scheme by 30 months after the entry into force of this amending Directive, what means that the EU will not have an effective mandatory EPR until 2027 or 2028. The question is who would cover the cost of necessary infrastructure, labour, and communication to citizens, commerce and industry; essential aspects to affect efficient separate collection by 1 January 2025? For this reason, we suggest an immediate implementation on adoption, which will most likely happen after 1 January 2025 in any case and an obligation for producers to reimburse all costs from the time when mandatory separate collection comes into force (1 January 2025).

- b. Define and clarify the role of local public authorities and social enterprises in EPR scheme

The proposal does not clarify the role of local public authorities (municipalities). As household and similar textile waste is municipal waste there should be a mandatory involvement of municipalities in the implementation of EPR for textiles. This is missing in the proposal and needs to be added, especially to ensure a uniform, regional organisation of the separate collection of textiles by the municipalities with the involvement of local social enterprises. To ensure success of separate collection and treatment of textile waste, it is crucial that textile PROs are obliged to collaborate with

municipalities and develop agreements with regard to collection and communication to citizens.

c. Ensure a comprehensive cost coverage for the management of textile waste in EPR scheme

We note that the proposal omits the cost of necessary communication activities for prevention and successful separate collection schemes. Without repeated, efficient and target communication to citizens, separate collection schemes are not successful. Having an efficient infrastructure is not enough to deliver effective, efficient separate collection for reuse, preparation-for-reuse and recycling. Constant communication (and not only temporary awareness-raising campaigns) are often not properly planned for and thus we suggest to explicitly embed it in the WFD.

Besides, the producers should bear the costs of collection and treatment of textile waste that remains in the mixed waste stream. Including this textile waste in producer responsibility obligations will ensure that sufficient incentives are given by the producer to sort out textile waste into the separate stream for collection rather than throwing it out with mixed waste. Higher quality textiles are also more likely to be properly sorted so the coverage of these costs by producer responsibility can also be seen as a practice-based modulated fee. This requirement also ensures that the citizen is not burdened with the cost of an inefficient collection, sorting and recycling system.

d. Include 'unsold textiles' to align with the Ecodesign Regulation for Sustainable Products

In accordance with the ban on the destruction of unsold textile products under the Ecodesign of Sustainable Products Regulation, we consider it to be of paramount importance to include a definition of 'unsold textile products' in Article 3 of the WFD so that these items will be covered by the relevant Articles referring to EPR and PROs. Unsold textile products, if not correctly handled, may cause negative environmental impacts in the EU and beyond, therefore they should not be omitted from extended producer responsibility. In order to add certainty to what we refer with 'unsold textile product', we

Recognizing textiles' substantial environmental impact, particularly in overproduction and fast fashion, propose the definition introduced by the EU Parliament in the Commission proposal for an Ecodesign Regulation for Sustainable Products.

4. Introducing measures on the prevention of textile waste

The directive must include preventive measures. The EU Strategy for Sustainable and Circular Textiles identified overproduction and fast fashion as the main issues to be addressed. It underscores the need to address these challenges for meaningful legislative impact.

Successful implementation of the Extended Producer Responsibility (EPR) in Textile Waste Management in France

To address the escalating environmental and health challenges posed by the fast fashion industry and the growing volume of end-of-use textiles, some countries are adopting Extended Producer Responsibility (EPR) policies. This framework mandates producers to manage the costs associated with collecting, treating, and recycling their products at the end of their life cycle.

Addressing the challenges

The rapid expansion of the fast fashion model has led to a surge in End of Use textiles, contributing to adverse human and environmental impacts. Massive amounts of textile waste are sent to landfills globally, exacerbating the waste crisis. Without effective measures and enforcement mechanisms, producer accountability for waste management remains inadequate.

Implementing a national EPR for textile waste

France stands out as a pioneering nation in implementing EPR specifically for textiles called "Refashion". Introduced in 2007, France's EPR framework compels textile producers to be responsible for recycling or proper disposal. This can be achieved through financial contributions to an accredited Producer Responsibility Organization (PRO) or by creating individual take-back programs approved by French authorities. The French PRO incentivizes producers with reduced tariffs for using

recycled fibers and monitors sorting and recycling channels. The EPR policy in France serves as a model for enhancing collection and recycling rates, sector transparency, consumer awareness, and collaboration among stakeholders.

Outcome

France's EPR policy has demonstrated significant success. Between 2006 and 2018, there was a threefold increase in the collection and recycling rates of post-consumer textiles, with a 13% annual increase since its implementation. The material recovery rate can reach 90%, and 50% of the recovered materials can be directly reused. In 2020, the scheme's around 4,000 members, paying €36 million to Refashion, of which €17 million went to sorting operators, €4 million to local community projects and almost €1 million to innovative projects. Brands placed more than 517,000 tons of product on the French market in 2020, with 204,000 tons collected – a collection rate of 39%. This is up from 27% in 2013, so the scheme can certainly claim to be having an impact.

The policy has stimulated collaboration, supported research and development, and created jobs. However, challenges remain, particularly in the 'reuse' stream, labor-intensive sorting procedures, and the difficulty in recycling fiber blends. The EPR scheme only cover, at present a small proportion of end of life costs.

Conclusions

This policy paper offers a set of recommendations that, if incorporated into the revised waste framework directive, will fortify Europe's stance in sustainable textile waste management. Drawing inspiration from successful implementations, such as France's EPR policy, these proposals aim to align legislative frameworks with the evolving landscape of waste management. A fair cooperation between all stakeholders will ensure a resilient and environmentally conscious future for the European Union.

Contact

Axelle GRIFFON
Square de Meeus, 1
1000 Brussels
Tel. +32 2 500 05 38
axelle.griffon@ccre-cemr.org

About CEMR

The Council of European Municipalities and Regions (CEMR) is the broadest association of local and regional governments in Europe. Its members are 60 national associations of municipalities and regions from 40 European countries. Together these associations represent some 115,000 local and regional governments.

CEMR's objectives are twofold: to influence European legislation on behalf of local and regional elected representatives, and to provide a platform for exchange between its member associations and their elected officials and experts.

Moreover, CEMR is the European section of United Cities and Local Governments (UCLG), the worldwide organisation of local government.