

EU Recyclers' Manifesto: Increasing textiles circularity by 2030



EURIC'S **5 RECOMMENDATIONS** FOR A CIRCULAR AND SUSTAINABLE **TEXTILE** SECTOR BY 2030

Each EU citizen generates about 16 kg of textile waste annually, but only 4.4 kg is collected separately within the EU for reuse and recycling. The majority goes to mixed household waste, ending up in incinerators or landfills. The textile sector significantly impacts the environment, being the 3rd largest contributor to environmental pressure on water and land use in the EU, and the 5th in raw materials consumption and greenhouse gas emissions [1].

Improving circularity in the textiles sector could significantly reduce these negative impacts, by extending the lifecycle of textile products and increasing the use of textile recycled fibres into new products. However, textile recycling remains currently limited, with less than 1% of material being recycled back into new clothing (the rest being recycled into other applications, incinerated or landfilled) [2].

Additionally, the textiles collection, sorting for reuse, and recycling sector in Europe is facing an unprecedented crisis with rising sorting costs, dropping sales of second-hand clothes, and a lack of demand for recycled textile content [3]. The rise of the ultra-fast fashion sold online has further increased those challenges, with a serious impact on the environment [4].

The objectives fixed in the EU Strategy for sustainable and circular textiles must be translated into a robust European regulatory framework.

EuRIC Textiles urges EU policymakers to actively support textiles circularity by shaping an industry environment where innovation thrives, investments in circularity are rewarded, and the textile reuse and recycling industry flourishes as a pillar of sustainability.

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[1] European Environment Agency's European Topic Centre on Circular Economy and Resource Use (2024), Briefing "Management of used and waste textiles in Europe's circular economy".

[2] Ellen MacArthur Foundation (2017), Report: "A new textiles economy: Redesigning fashion's future" [3] The low prices of fast fashion primary yarns from outside the EU put recycled fibres from textiles made in the EU at a vast disadvantage.

[4] European Commission, 2025, Communication "A comprehensive EU toolbox for safe and

sustainable e-commerce"

KEY LEGISLATIVE MEASURES INCLUDE:



Developing Extended Producer Responsibility (EPR) schemes for textiles in all EU Member States (as enshrined in the revised Waste Framework Directive)



Introducing ambitious ecodesign requirements promoting the use of recycled content in new textile products



Better informing European consumers and textile waste sorters on the clothes' fibre composition, the share and source of recycled content (via the Digital Product Passport and the upcoming revision of the Textile Labelling Regulation)



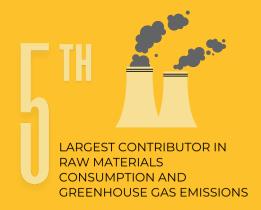
Establishing clear EU End-of-Waste (EoW) criteria for textile waste, and ensuring that upcoming REACH chemicals restrictions do not hinder textile recycling

EuRIC's Textiles Branch (EuRIC Textiles), which comprises of national recycling federations active in the collection, sorting, reuse and recycling of used textiles, can play a key role in increasing circularity in the textiles sector. As reuse and recycling operators, EuRIC Textiles' members actively contribute to the EU's decarbonisation efforts.

In this Manifesto, EuRIC's Textiles Branch presents five key policy recommendations to increase circularity in the textiles sector by 2030.



SOURCE: EEA, 2024



INTRODUCE ECODESIGN REQUIREMENTS FOR TEXTILES

Ecodesign requirements for textiles should become standard practice. Proper design has to ensure that products can be easily repaired, reused, disassembled, and recycled at the end of the life, ultimately creating a closed loop system.

The European Commission should take an ambitious, stepwise approach to defining and regularly reviewing ecodesign performance requirements. This is particularly crucial as **ultra-fast fashion continues to degrade the quality of textiles collected** in the used clothing bins, making reuse and recycling harder due to the increased use of cheap synthetic fibres and low-quality production.

Durability requirements: To reduce their environmental impact by extending their lifespan, textiles should have minimum robustness requirements to be defined and tailored to the type of garment, the type of raw materials, and its intended function. Durability should be defined holistically to include not only the physical robustness aspect of the garment, but also its emotional durability, ultimately forcing brands to ensure, among others, high-quality standard products that are both resilient and comfortable [5].

Recycled content requirements:

Mandating the use of textile-to-textile recycled content in new garments will drive the demand for recycled materials and stimulate sorting and recycling technologies. The EU Commission should narrowly define recycled content, to exclude open-loop recycled content from i.e. PET bottles.



[5] In 63% of the cases, clothes are disposed because of poor fit and perceived value, instead of the actual quality of the garment (Kirsi Laitala and Ingun Grimstad Klepp (2022), "Review of clothing disposal reasons", Clothing research).

Recycled textile fibres should mainly come from post-consumer textile waste (i.e. clothing that have been worn and disposed of by the end-user) generated in the EU and must be produced sustainably (meeting specific human rights, social, and environmental minimum requirements for the production).

All efforts should be put in ensuring proper end-of-life treatment for post-consumer textile waste: The mandatory separate collection of used textiles in the EU as of 1 January 2025, is likely to increase the amount of textile waste collected, the volume of non-reusable used clothing, and thus the potential infeed for textile recycling facilities.

Recyclability requirements: Recyclability is largely dependent on ongoing developments in recycling technology (mechanical, chemical or thermal recycling). The EU Commission should ensure that recyclability requirements support rather than hinder, technological progress.



For a material to be truly recyclable:

- The technology must be available at an industrial scale and be economically viable;
- Separate collection of used textiles should be increased and improved;
- Sorting semi-automation and material recognition technologies need to be scaled up;
- Garments should have fewer fibre types, non-textile elements, fabric layers, finishes, and membranes, making them easier for recyclers to process.

STRENGTHEN FAIR TRADE OF USED TEXTILES

Creating a strong internal market for reuse and recycling in Europe is key to achieving textiles circularity by 2030.

In this respect, **introducing EU End-of-Waste (EOW) criteria** for both reuse and recycling is crucial to reflect the specific needs of the textile waste stream.

EuRIC Textiles calls for EOW criteria designed to create a well-functioning EU market for reusable and recycled materials and support the implementation of waste management and ecodesign legislation:



• **EOW for reuse** can be granted when a textile fraction is deemed suitable for reuse without further processing (since a professional sorter can assess if textiles are suitable for reuse)



• **EOW for recycling** can be granted when the output of the recycling process is equivalent to primary raw materials and ready for direct conversion into new textile products or other types of goods

EU policymakers should focus on **tackling the illegal shipment of textile waste disguised as used clothing**, which evades waste regime controls under the revised Waste Shipment Regulation (WSR). While Denmark, France, and Sweden <u>proposed</u> in March 2024, to amend the Basel Convention [6] to require prior written notification and consent for non-hazardous textile waste shipments, this measure will not end the problem. Instead, it will worsen the challenges already faced by Europe's textile sorting and recycling companies.

To ensure that only second-hand textiles, not textile waste, are shipped outside the waste regime, **establishing a detailed sorting process prior to any shipment is crucial**. **EuRIC Textiles strongly supports the establishment of harmonised EU sorting criteria** to ensure that only second-hand textiles, which meet the destination's requirements, are shipped outside the waste regime, to be reused. Already in 2021, <u>EuRIC Textiles had established such criteria</u> guiding sorting companies on proper collection, preparation for reuse and preparation for recycling.

Future policy measures should effectively combat illegal shipments while ensuring they do not 1) place excessive administrative burdens on companies that already comply with the rules, and 2) overlook the socio-economic impact on receiving countries.

[6] "Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal": adopted in 1989, it is the most comprehensive global environmental agreement on hazardous wastes and other wastes.



INTRODUCE EPR SCHEMES FOR TEXTILES CLEARLY SUPPORTING THE REUSE AND RECYCLING SECTOR

The revised Waste Framework Directive (WFD) requiring all EU Member States to establish EPR schemes for textiles in the next years marks a significant step forward for the circular economy and textile waste management.

These schemes must be designed as a transitional tool to support, improve and scale-up textile waste management, reuse and recycling, and align with the mandatory separate collection of used and waste textiles in the EU starting on 1st January 2025.

It is also key to **ensure effective and strict enforcement of EPR schemes** for textiles across the EU, to make sure that every producer, regardless of location and including e-commerce, comply with the EPR obligations. Otherwise, this system will not be sustained over time and will not achieve its goals.

On top of establishing EPR schemes, **EuRIC**Textiles calls for reduced VAT rate on
second-hand products and repair services
to boost market demand for used textiles,
stimulating the whole value chain.

Furthermore, recycling services in the EU should also benefit from lower VAT rates to enhance competitiveness against virgin material production.





TO SUPPORT EUROPE'S TEXTILE REUSE AND RECYCLING SECTOR, EURIC CALLS FOR:



Inclusive governance: Involve all relevant stakeholders with a key role in the circular value chain (such as reuse and recycling operators) in EPR decision-making, not just textile producers, to improve separate collection and reuse rates



Fair EPR fees: Apply EPR fees only to new textile products, (placed on the market within the EU for the first time), following the polluter-pays principle. Second-hand textiles should be exempt, as used textile sellers are not textile producers: they promote sustainability by extending product life



Equal treatment: Ensure a level playing field for all textile waste treatment players, with no preferential treatment for social enterprises or any other group of stakeholders. Commercial operators, highly trained and experienced, are essential to sustainably manage large-scale textile waste



Targets on reuse and recycling: To uphold the commitment of the EU Strategy for sustainable and circular textiles, clear targets for reuse and recycling should be introduced by 2029 to drive progress in textile waste management



Tackle (ultra) fast-fashion through EPR eco-modulation: Member States should modulate EPR fees on the basis of criteria that takes into account producers' practices that lead to the over-production and -consumption of textiles – and thus ensuring that the price of ultra-fast fashion reflects the environmental damage it causes



Awareness-raising on separate collection: Develop clear disposal guidelines to reduce contamination risks, optimise costs, and improve efficiency of separate textile collection



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BALANCE CHEMICALS LEGISLATION: ENSURING COMPLIANCE WITHOUT HARMING THE CIRCULAR ECONOMY

Protecting human health and the environment is essential for textile recyclers.

Effective toxic-free product design (by limiting the use of substances of concern in textile products and complying with REACH) would significantly reduce the need for energy-intensive technologies to recycle waste textiles. **EuRIC Textiles demands transparency across the entire value chain**. The future of textiles must be free from intentionally added chemicals that hinder recycling and pose a risk to human health.

As chemical regulations and research continue to evolve, some chemicals permitted today may face future restrictions or stricter limits under REACH. This poses a significant challenge to the circular economy, as textiles currently deemed compliant could later be banned, forcing the textile reuse and recycling industry to manage the consequences of these outdated materials.

A pragmatic risk-based approach is thus essential, balancing product safety with circular economy's goals. Future chemicals legislation and restrictions should continue guaranteeing fair competition between recycled textiles and virgin raw materials as well as between first-hand and second-hand textiles by providing legal clarity and economically viable compliance pathways. Small and medium-sized enterprises, which form the backbone of the textile recycling sector, need proportionate and technically feasible compliance requirements to support long-term sustainability and prevent unnecessary landfilling or incineration. In this context, EuRIC calls for:



Establishing practical, risk-based thresholds for recycled textiles, reflecting the technical realities of mechanical and chemical recycling



Implementing a proportionate and realistic monitoring framework that accounts for the challenges of tracking thousands of substances, particularly in post-consumer textiles



Enhancing collaboration between regulators, recyclers, and brands to align product design with recycling capabilities and compliance requirements

The future of textiles must be free from intentionally added chemicals that hinder recycling and pose a risk to human health

Mariska Boer, President of EuRIC's Textiles Branch





IMPROVE CONSUMER AND TEXTILE SORTER INFORMATION WITH AN EFFECTIVE DIGITAL PRODUCT PASSPORT AND CLEAR LABELS

The Digital Product Passport (DPP) will be very useful for the textile stream if it provides **clear**, **structured**, **and easily accessible data**. It will help consumers make informed choices, enable public authorities to perform better checks and controls, and provide textile sorters with information about the materials in a product.

The DPP needs to be designed for easy access by sorters, especially by avoiding an overload of unnecessary data. The DPP's technology will be particularly key by taking into account the specificities of the sorting process and allowing for instant verification.

Incentives should be encouraged to support the DPP's deployment in the reuse and recycling sector. EuRIC Textiles calls for more funding at both EU and national levels into research, innovation and the scaling up of infrastructure for the high-quality manual and/or automatic composition sorting of textiles. This is crucial for the industry to be ready to make use of collected waste by means of reuse, recycling, reusing or repairing.



VIA THE DPP, THE WAY TEXTILES ARE LABELED WHEN PLACED ON THE EU MARKET NEEDS TO BE IMPROVED:



Ensure that physical labels and digital labels complement each other.

Physical labels should display textile care instructions and support digital labels with additional information on recycled content, energy consumption, circularity and material traceability



Introduce mandatory durability information requirements to educate consumers on how to make their clothes last longer, and to inform consumers with an accurate list of physical durability characteristics of a garment (e.g. dimensional stability, abrasion resistance, colour fastness). The DPP should clearly explain how to use, maintain and repair garments, to minimise its environmental impact and ensure durability



Introduce mandatory recycled content information to ensure consumers can make informed decisions based on accurate data. EuRIC Textiles calls for clear rules on how to display recycled textile fibres, requiring manufacturers to disclose the origin of recycled materials contained in a garment (whether from post-consumer textile waste or from other types of waste) to prevent greenwashing and help consumers make more informed choices



Enforce stricter compliance monitoring to ensure accurate and complete label information, as currently, about 40% of textile product labels are incorrect or incomplete



EuRIC is the voice of Europe's recycling industries, representing 80 members across 24 EU & EFTA countries, and over 5,500 companies. We drive a 95 billion EUR contribution to the EU economy and support 300,000 green, local jobs. By turning waste into valuable resources and reintroducing materials into value chains, we are at the forefront of circularity and climate neutrality. As a catalyst in Europe's green transition, EuRIC is driving the industrial shift that boosts EU competitiveness, resilience, and strategic autonomy.





EuRIC's Textiles Reuse and Recycling Branch (EuRIC Textiles) promotes the collective interests of Europe's textile recycling and re-use industries. The branch contributes to the implementation of the EU's textiles strategy, including developing eco-design criteria, setting mandatory recycled content targets, and establishing endof-waste criteria for textiles. As textile re-use and recycling have gained priority at the European level, EuRIC Textiles was founded in 2019 to represent the industry's voice.





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