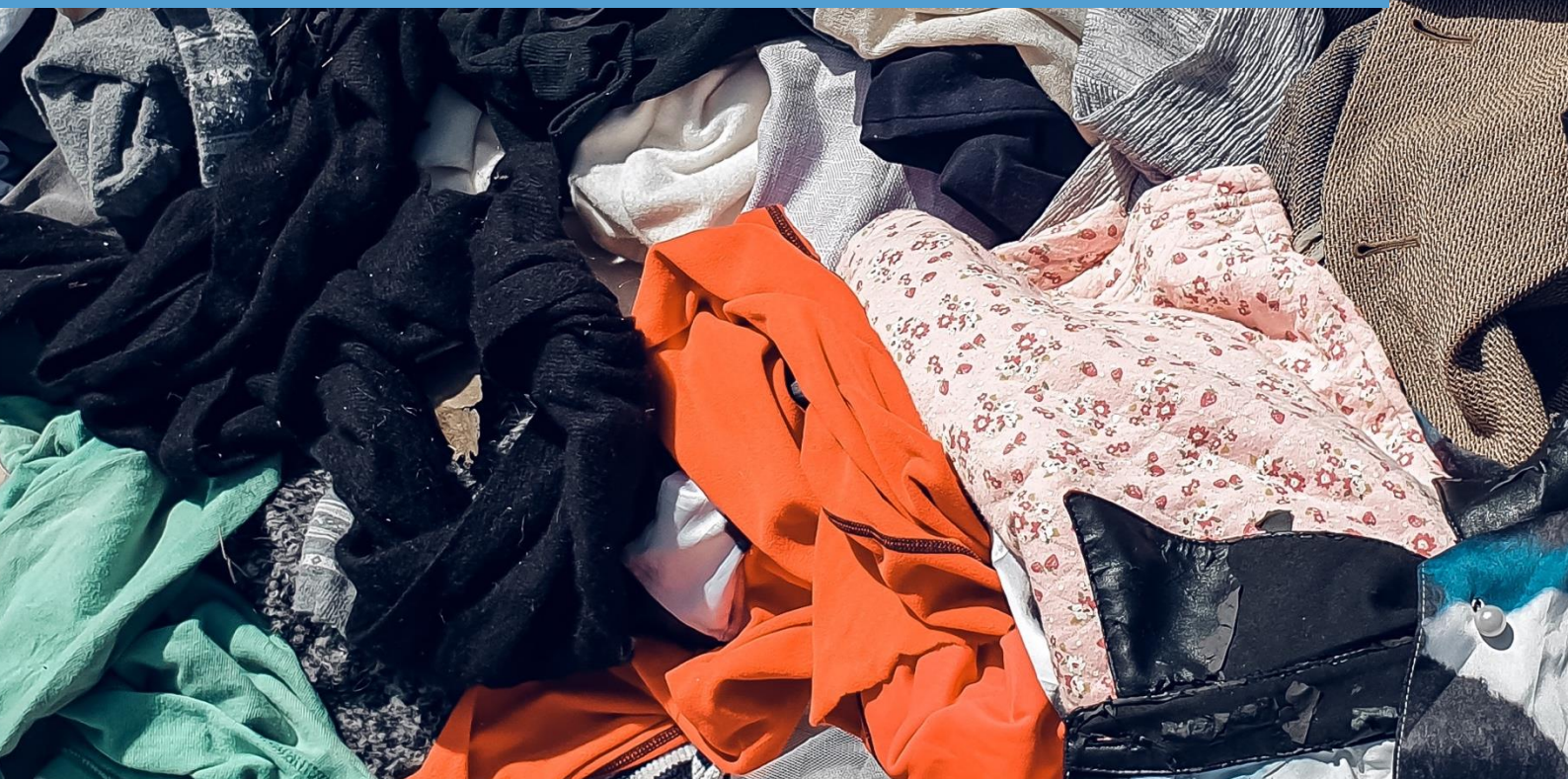




# Textiles Extended Producer Responsibility (EPR)

Status report summarising the proliferation of Extended Producer Responsibility (EPR) systems for the textiles waste stream



Research Date: November 2023 – December 2023  
Publication Date: January 2024



# About WRAP

*WRAP is a climate action NGO working around the globe to tackle the causes of the climate crisis and give the planet a sustainable future.*

*Our core purpose is to help you tackle climate change and protect our planet by changing the way things are produced, consumed, and disposed of.*

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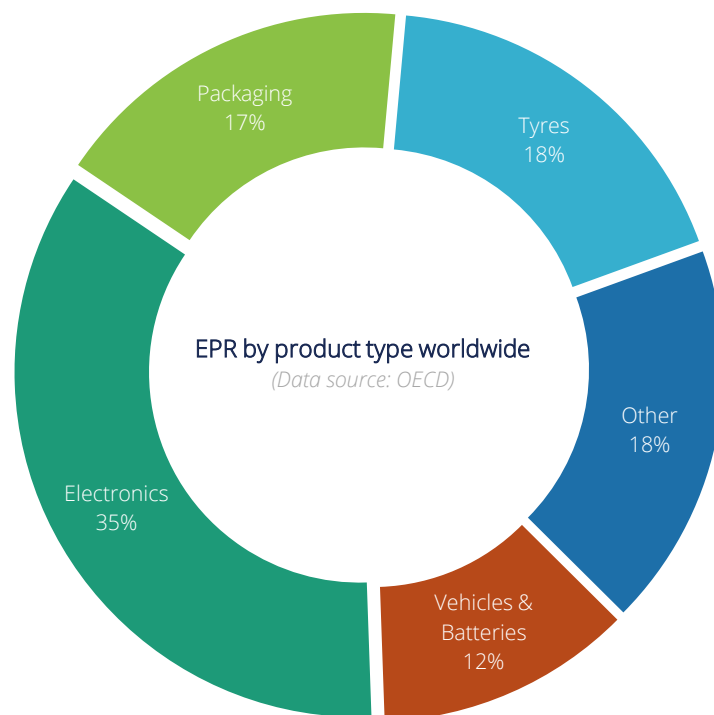
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# Executive Summary

Textiles have a significant environmental impact. 8% - 10% of global greenhouse gas emissions come from clothing and footwear. The EU generates 12.6 million tonnes of textile waste per year. In the UK, 23 million garments are sent to landfill or incinerated each year, generating 750,000 tonnes of CO<sub>2</sub> emissions.

Whilst textiles have a significant environmental impact, Extended Producer Responsibility (EPR) systems have been relatively uncommon for this waste stream, with the majority of EPR systems worldwide being for the electronics waste stream making up 35% of all systems.



It is expected that the number of EPR systems for textiles will rapidly change during the next decade. This status report is designed to provide a summary of why EPR systems for textiles are needed worldwide and the proliferation of active or emerging Textiles EPR systems.

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# Why should we care about textile waste?

8%-10%

of global greenhouse emissions come from clothing and footwear

The percentage of textiles recycled in the USA is only

14.7%

12.6 million tonnes

of textile waste generated by the EU per year

17 million tonnes

of textile waste generated by the USA per year

The value is lost every year due to clothing underutilisation and lack of recycling is

\$460 billion

4<sup>th</sup>

highest impact on environment and climate change in Europe

1.7 million tonnes

of fibre products are discarded each year in Japan, which is 13.5kg per person

The total volume of greenhouse gas emitted from textiles product annually is

1.2 billion tonnes

which is more than emissions from all international flights and maritime shipping combined

**1 million tonnes**

of used textiles is generated annually in the UK

**23 million garments**

are sent to landfill or incinerated in the UK each year, which generates

**750,000 tonnes of CO<sub>2</sub>**

The percentage of material recycled into new clothing is just

**1%**

**8,000 litres of water**

is required to produce one pair of jeans and 47% of jeans that are produced are not sold

Australians buy on average

**56 items of clothing**

and manufacture/import over

**1.4 billion units** of new clothing every year

Using recyclates from textiles in new textile products ('fibre-to-fibre') can reduce the climate impact of a textile product by

**10%**

Clothing is a major carbon impact contributor of Scotland's household waste stream at

**32%**

# Introduction

## What is Extended Producer Responsibility (EPR)?

Extended Producer Responsibility (EPR) is a regulatory mechanism used to finance costs associated to the environmentally friendly management of a product or its packaging once it reaches its end-of-life by placing such costs on manufacturers / sellers ('producers').

Traditionally, the concept of EPR has been applied to three waste streams, Packaging, E-waste / WEEE (Waste Electrical & Electronic Equipment), and Batteries, but some pioneering countries are leading the way on EPR for other problematic waste streams, such as textiles.

Other than in France, Textiles EPR systems are not well established. The need for systems to manage textile waste has become significantly more apparent in recent years and consequently, Textiles EPR systems are emerging around the world. WRAP has produced this report to summarise the proliferation of EPR systems for the textiles waste stream across the world.

## EU Strategy for Sustainable & Circular Textiles

The [EU Strategy for Sustainable & Circular Textiles](#) was published in March 2022. In line with the Strategy, a [proposal](#) that would require the mandatory adoption of Textiles EPR systems was published in July 2023. The mandatory separate collection of textiles will apply for all producers by January 2025. Regions around the world are planning similar policy. EPR systems for textiles do not necessarily only apply to clothing, the scope can be extensive.



Clothing



Accessories



Footwear



Household  
Linen



Carpet &  
Furniture



Toys

The scope of Textiles EPR set by the European Commission is clothing, apparel, footwear, blankets, rugs, bed linen, and curtains<sup>1</sup>. The European Commission estimated an EPR fee of €0.12 per garment<sup>2</sup>.

## Textiles EPR in the European Union

- ❖ Producers will be required to cover the costs of managing textile waste and producers will be given incentives to reduce waste and increase the circularity of textile products<sup>3</sup>.
- ❖ Online marketplaces will be obligated to register under Textiles EPR systems and obtain self-certification from producers that their products meet EPR requirements in the consumers place of residence.
- ❖ The European Commission's 2030 vision for textiles is that all textile products placed on the EU market are durable, repairable, and recyclable.

The Commission will set design requirements for textiles to make them last longer, easier to repair and recycle, as well as requirements on minimum recycled content.

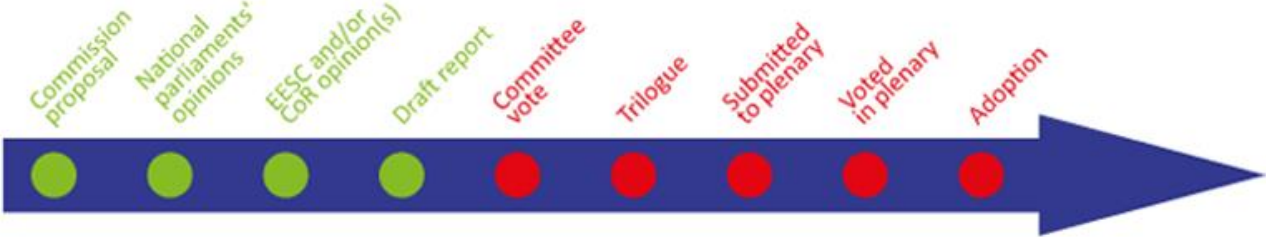
- ❖ Through Textiles EPR systems and integrated policy mechanisms, the European Commission aims to reverse overproduction/overconsumption, discourage the destruction of unsold/returned textiles, and tackle greenwashing to raise awareness about sustainable textiles.
- ❖ Illegal exports of textile waste to countries ill-equipped to manage it will be reduced/eliminated. There will be clarification of what constitutes waste and what is considered as reusable textiles. This will stop the exports of waste disguised as exports for reuse.
- ❖ Eco-modulation of EPR fees will be applied<sup>4</sup>, where producers of harder-to-recycle products are charged higher fees and producers of easier-to-recycle products are charged lower fees.
- ❖ It has been proposed that microenterprises (*enterprises with fewer than 10 employees or with an annual balance sheet less than €2 million*) would be exempt from EPR obligation. Although, this has received push-back from industry stakeholders because microenterprises represent 88% of the market.

As a method to tackle fast fashion, a group of industry stakeholders (*including, Changing Markets Foundation, Zero Waste Europe, Recycling Network Benelux, the Environmental Coalition on Standards, and the European Environmental Bureau*) have proposed that a volume criteria for EPR fee eco-modulation should be adopted for textiles, encouraging producers to prioritise quality over quantity<sup>5</sup>. The same group also called for online platforms being required to verify producer EPR registrations before listing products (and be held liable for non-compliance of sellers).



Advanced recycling technology is required to replace or complement inefficient mechanical recycling<sup>6</sup>. If recycling technology and infrastructure is not improved, increasing the collection rates of waste textiles will only result in stockpiles of used textiles. As an example, according to the [European Sustainable Business Federation](#), a technical solution is needed for cotton-polyester mixes.

In December 2023, the European Parliament published a briefing that included an image depicting the progress of proposal adoption.



(Image Source: [European Parliament, December 2023](#))

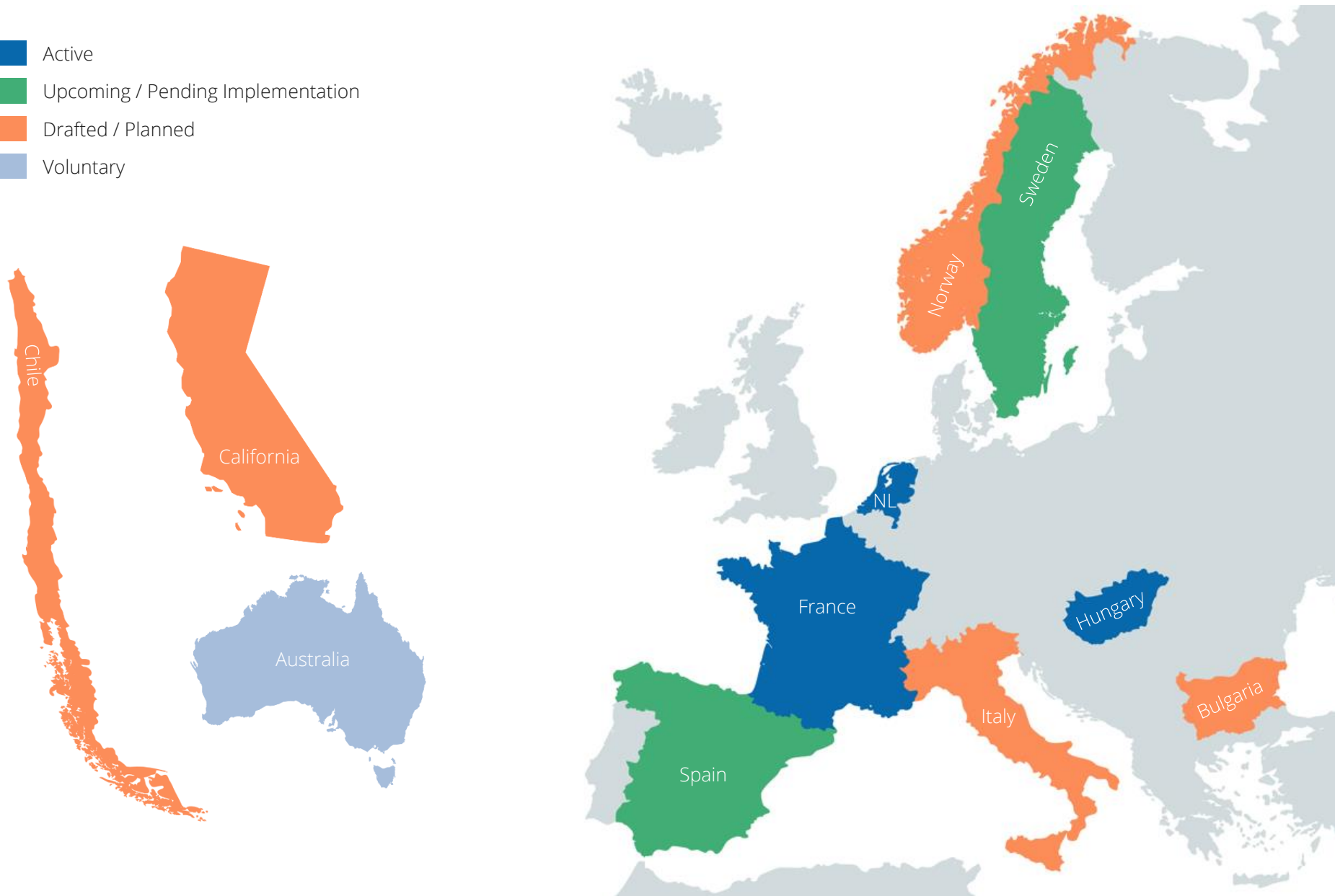
# National Textiles EPR systems

## Overview of Textiles EPR systems worldwide

Country	Status	Scope	EPR Fee
France	Active	Clothing, Footwear, & Household Textiles	Average: €0.01 per unit Maximum: €0.06 per unit
Netherlands	Active <i>(Producer obligations from 2025)</i>	Consumer Clothing, Workwear & Household Textiles <i>(System does not apply to shoes, blankets, belts, curtains, etc.)</i>	€0.1 per kg <i>(2024 Fee)</i>
Sweden	Upcoming	Clothing, Household Textiles & Accessories	SEK 0.23 (€0.02) per unit <i>(Expected fee for t-shirt, provided as an example)</i>
Hungary	Active	Clothing, Footwear, Household Textiles, Accessories & Carpets	HUF 145 (€0.42) per kg
Australia	Voluntary	Clothing	\$0.04 (€0.03) per unit
Spain	Pending Implementation	Clothing & Footwear	<i>To be confirmed</i>
California	Drafted	Clothing, Accessories, Household Textiles & Furnishings/Upholstery	<i>To be confirmed</i>

Bulgaria	Drafted	'Textiles & Footwear'	<i>To be confirmed</i>
Italy	Drafted	Clothing, Footwear, Household Textiles & Accessories	<i>To be confirmed</i>
Norway	Planned	Clothing, Footwear, Accessories, Household Textiles & Healthcare Textiles	<i>To be confirmed</i>
Chile	Planned	<i>To be confirmed</i>	<i>To be confirmed</i>
United Kingdom	Potential	<i>To be confirmed</i>	£0.10 (€0.12) per unit <i>(Estimate)</i>

- Active
- Upcoming / Pending Implementation
- Drafted / Planned
- Voluntary



## France

Nine million textiles items are sold in France every day. In 2022, 3.3 billion textile items were placed on the market in France. This equates to 827,000 tonnes, which is the weight of 82 Eiffel Towers. In 2022, each person in France bought on average 40 items of clothing, 4 pairs of shoes, and 5 items of household linen (12.2kg of textiles per year, per inhabitant)<sup>7</sup>.

France was the first country in the world to adopt EPR for textiles<sup>8</sup>. The Textiles EPR system has been active in France since 2008. In 2008, 2.3 billion textile items were placed on the market in France; this increased to 2.8 billion by 2018 (21% increase)<sup>9</sup>. The Textiles EPR system in France applies to clothing, footwear, and household linens.



(Data source: Refashion)

### Requirements for producers under France's Textiles EPR system

- ❖ Collective or individual compliance is permitted. However, whilst some large companies, such as H&M, have established their own take-back systems, 95% of the market are registered members of the [Refashion](#) collective compliance scheme<sup>10</sup>. Refashion has over 4,000 registered members and operates one textile collection point per 1,440 inhabitants of France<sup>11</sup>.
- ❖ The current EPR fee is a maximum of €0.06 and an average of €0.01 per garment.
- ❖ France's Textiles EPR system has adopted the concept of eco-modulated EPR fees, where producers of harder-to-recycle and less environmentally friendly products are charged higher EPR fees and producers of easier-to-recycle products are charged lower EPR fees.

There are currently three eco-modulation levels, one of which aims to encourage the design of more durable and resistant products and another of which encourages the integration of recycled materials. As an example, producers that integrate 15% recycled fibres sourced from post-consumer textiles receive a 50% discount on their EPR fees<sup>12</sup>.

- ❖ Producers must report placed on the market data on an annual basis by March of the succeeding year.
- ❖ Producers are obligated to display the [Triman Logo and accompanying Sorting Instructions](#) on in scope textiles to inform consumers of how the textiles can be collected for recycling.



### Is France's Textiles EPR system successful?

- ❖ France's Textiles EPR system contributed to a threefold increase in the collection and recycling rates of consumer textiles since 2006. Furthermore, the material recovery rate of consumer textiles in France can reach up to 90%<sup>12</sup>.
- ❖ 49% of French population surveyed declared that they buy less clothes than before, compared to 38% in 2021<sup>13</sup>.

Whilst the French population declared that they buy less clothes than before, the number of items placed on the market increased by 21% since the inception of the system, so buying habits have not been curbed. Refashion supplemented the 38% - 42% increase by stating that this boom in good practice reinforces the need to raise public awareness.

- ❖ During the last 10 years, the level of EPR contributions has risen from €11 million to €25.5 million in 2019<sup>14</sup>.
- ❖ Refashion has provided €5.6 million of funding for research and development in the textiles sector over the last 12 years<sup>15</sup>.
- ❖ The French Ministry of Ecological Transition, which sets the directive for Refashion, has dramatically increased Refashion's budget, estimating a spend of €1 Billion across 6 years to improve collection, sorting, reuse, and recycling<sup>16</sup>.
- ❖ Whilst the figures associated to the Refashion system show overwhelming success, there are some reports that most of the textiles collected in France are not treated within France and are instead exported to low/middle income countries.

In 2021, Refashion collected 244,448 tonnes of textiles<sup>17</sup>. According to a [2023 report published by The OR Foundation](#), 80% of the textiles collected by Refashion are exported, primarily to countries throughout the Global South and to low/middle income countries that do not have the necessary waste management resources.

## Netherlands

305,000 tonnes of textiles were discarded by households in the Netherlands during 2018, which is 17.7 kg per inhabitant. Of this, 44.6% was collected separately (136,100 tonnes) and 55.4% (169,000 tonnes) ended up as household waste<sup>18</sup>.

Before implementation of the EPR Decree, 45% of textiles were already collected through separate waste streams, of which 55% is reused and 33% is recycled. However, studies in the Netherlands showed that separate textile collections from households were no longer cost-effective due to the decreasing reuse market and low recycling capacity in the Netherlands and Europe<sup>19</sup>. [Kennedy Van der Lann](#) claim that half of textile waste currently ends up in the residual waste stream and gets sent to an incinerator.

The Netherlands [EPR Decree](#) entered into force in July 2023. The Decree gives producers obligations from 2025. [Stichting UPV Textiel](#) is currently the only PRO.

### Scope of Netherlands Textiles EPR

The Textiles EPR system in the Netherlands applies to consumer clothes (incl. workwear) and household textiles such as tablecloths, bed linen, and towels. Notably, the system does not apply to footwear, bags, blankets, or curtains.

Unsold stock that has not been placed on the market is not covered by the obligations, whereas returned products that have been placed on the market are<sup>20</sup>.

### Obligated companies

As expected, the Textiles EPR system in the Netherlands applies to manufacturers, producers, and importers. Specifically, the Textiles EPR system applies to *“the party who is the first to offer the textile product professionally in the Netherlands.”* This definition also obligates foreign companies that sell textile products to customers in the Netherlands.

Furthermore, regarding obligations for foreign companies, the concept of ‘Authorised Representatives’ is applied; whereby, foreign companies are required to appoint a national ‘Authorised Representative’ in the Netherlands to fulfil EPR obligations on their behalf. The concept of ‘Authorised Representatives’ was first introduced by the 2012 WEEE Recast Directive ([2012/19/EU](#)) and its primary purpose is to facilitate compliance monitoring for foreign obligated companies.

### Requirements for producers under the Netherlands Textiles EPR system

- ❖ The Textiles EPR fee for 2024 is €0.10 per kg, increasing to €0.20 per kg in 2025<sup>21</sup>.
- ❖ Historically, municipalities have been responsible for the collection of waste textiles in the Netherlands. Under the new EPR system, producers must organise free-of-charge collection systems for consumers.
- ❖ Producers are obligated to prepare a percentage of collected textiles for recycling and reuse and to ensure that a proportion of the collected textile waste is reused for clothing or household textiles through fibre-to-fibre recycling processes. Targets from 2025 are:
  - 50% of textiles sold must be prepared for reuse or recycling  
*(Increasing to 75% by 2030)*
  - 10% of textiles sold must be reused in the Netherlands  
*(Increasing to 15% by 2030)*
  - 25% of the recycled textiles are fibre-to-fibre recycled  
*(Increasing to 33% by 2030)*
- ❖ Whilst the Decree gives producers obligations primarily from 2025, producers possess reporting obligations from 2023 i.e., 'notification obligations' begin immediately, but producers are given time to start achieving reuse and recycling targets.



## Sweden

In Sweden, between 2000 – 2015, there was a 50%+ increase in textile consumption<sup>22</sup>. The proposed [Producer Responsibility Ordinance for Textiles 2020:72](#) was initially planned to come into force from January 2022, but PROs are not required to operate until January 2023<sup>23</sup>.

Sweden's Textiles EPR system is targeting a 70% reduction of textiles disposed of by 2028, an 80% reduction by 2032, and a 90% reduction by 2036<sup>24</sup>. Furthermore, from 2028, at least 90% of textile waste collected must be prepared for reuse or sent for recycling.

The new EPR system will cost Swedish producers collectively SEK 320,200,000 (~\$30,500,000) per year and foreign producers collectively SEK 4,600,000 (~\$440,000) per year<sup>24</sup>. The new system will result in the increased separate collection of over 85,000 tonnes of textile waste that would previously have been sent for energy recovery and will instead be prepared for reuse and recycling<sup>24</sup>).

- ❖ **Scope of Sweden Textiles EPR:** Clothes, household & interior textiles, bags, and accessories.
- ❖ **Exemption:** Producers that produce textile products from >80% textile waste (fibre-to-fibre) are exempt from obligations.
- ❖ **Cost:** Producers will need to join a PRO to comply. The expected EPR fee for a t-shirt is SEK 0.23 (~\$0.02)<sup>24</sup>.
- ❖ **Obligated companies:** Whilst >99% of companies placing textiles on the market in Sweden are based in Sweden, in addition to local companies, foreign companies that sell textiles to customers in Sweden also have obligations<sup>24</sup>. Foreign companies can appoint a national 'Authorised Representative' in Sweden to fulfil EPR obligations on their behalf. The concept of 'Authorised Representatives' was first introduced by the 2012 WEEE Recast Directive ([2012/19/EU](#)) and its primary purpose is to facilitate compliance monitoring for foreign obligated companies.

Furthermore, obligations are placed on Sweden-based online marketplaces for products sold through their online marketplace to customers in Sweden.

## Hungary

[Decree 80/2023](#) introduced Textiles EPR in Hungary. Obligated companies were required to register with the National Waste Management Authority by 31 May 2023. Producers are required to make EPR contributions on a quarterly basis<sup>25</sup>.

- ❖ **Scope of Hungary Textiles EPR:** Apparel, clothing accessories, household linens, curtains, blankets/rugs, footwear, and carpets.
- ❖ **Cost:** HUF 145 (\$0.42) per kg of textiles<sup>26</sup>.
- ❖ **Obligated companies:** Obligations apply at the first domestic sale of the product. Foreign companies selling directly to customers in Hungary also have obligations.

Foreign companies are permitted to appoint a national 'Authorised Representative'. The concept of 'Authorised Representatives' was first introduced by the 2012 WEEE Recast Directive ([2012/19/EU](#)) and its primary purpose is to facilitate compliance monitoring for foreign obligated companies.

## Spain

[Law 7/2022](#) on Waste & Contaminated Soil for the Circular Economy entered into force in April 2022. The Law expanded the application of the EPR concept to cover the textiles waste stream. However, the deadline for implementation is not until April 2025. Thus, whilst Textiles EPR is present in the Law, it is not active in Spain whilst implementation is pending.

Notably, in addition to national producers, the Law places obligations on national online marketplaces that allow foreign sellers to place textiles on the market in Spain.

## Australia

Australians buy on average 56 items of clothing a year and manufacture/import over 1.4 billion units of new clothing every year. 200,000 tonnes of clothing go to landfill each year. The Australian Government added clothing textiles to the [Federal Minister's priority list for product stewardship](#), with industry required to take action to reduce clothing sent to landfill. MP Tanya Plibersek issued a clear directive that if a stewardship scheme is not taken up enough by industry, it will be formally regulated by the Australian Government.

WRAP worked extensively with the [Australian Fashion Council](#), [Charitable Recycling Australia](#), [Queensland University of Technology](#), and [Sustainable Resource Use](#) to establish a [National Stewardship Scheme](#) for clothing in Australia. The scheme requires stewards to charge a levy of four-cent per garment to incentivise clothing design that is more durable and recyclable, as well as helping to fund the expansion of textiles collection, sorting, and recycling infrastructure. The [Seamless](#) stewardship scheme is a voluntary initiative that was co-created by WRAP. The scheme aims to create a circular clothing industry by 2030.

In 2023, Tanya Plibersek MP issued a clear directive that the Seamless stewardship scheme would be mandated if not taken up by enough businesses:

*"I want to see industry leadership... But if I don't see enough movement in a year, then I will regulate."*

## Bulgaria

The volume of new textile products and footwear placed on the market in Bulgaria has increased by 122% in seven years (as of 2020)<sup>27</sup>.

In 2022, Bulgaria published a draft Regulation on the Management of Footwear & Textile Waste that would introduce the concept of EPR for footwear and textiles. Producers would be obligated to coordinate and finance the separate collection and recycling (and preparation for reuse) of waste footwear and textiles.

## United States of America (California)

17 million tons of textiles are discarded in USA each year and only 14.7% is recycled<sup>28</sup>. Each consumer in USA discards 36kg+ of clothing per year and only 15% is reused or recycled<sup>29</sup>.

Some US states have recognised that textile waste is an issue. For example, the [Product Stewardship Institute](#) has worked with industry in New York to create Standards for collection of used textiles, Re-Clothe NY.

Regarding Textiles EPR, California is a pioneering US state. The [Responsible Textile Recovery Act SB 707](#) will adopt Textiles EPR in California. Following some postponements to conduct wording negotiations during 2023, Act SB 707 is expected to be actioned during 2024.

- ❖ **Scope of California, USA Textiles EPR:** Apparel, accessories, handbags/backpacks, drapes/curtains, furnishings, upholstery, bedding, towels, and napkins/tablecloths<sup>29</sup>.
- ❖ **Penalties for non-compliance:** Fines of \$10,000 - \$50,000 per day<sup>30</sup>.

The Bill requires a program operator to submit a completed stewardship plan to the regulator for review and approval<sup>31</sup>. CalRecycle will be required to adopt regulations to implement the Bill's requirements with an effective date no earlier than 31 December 2025<sup>30</sup>. The Act would require producers to:

- ❖ Implement and fund a Textiles EPR system<sup>29</sup>.
- ❖ Make products more durable and easier to repair, reuse, and recycle.
- ❖ Provide CalRecycle with a list of covered products that they sell, as well as an updated list on an annual basis by 15 January each year<sup>30</sup>.

## Italy

From January 2022, a separate collection stream for textiles has been mandatory in Italy to facilitate recycling. The current level of separate collection for textile waste is still very low in Italy, at just 2.6kg per inhabitant in 2021<sup>32</sup>.

The Ministry of Environment & Energy Safety (MASE) and the Ministry of Enterprises presented a draft Textiles EPR Decree in February 2023. A consultation period for the draft Decree closed in March 2023<sup>33</sup>.

Producers will be required to ensure that they produce products that are suitable for reuse and repair, contain recycled materials, are technically durable, and are easily repairable<sup>34</sup>.

- ❖ **Scope of Textiles EPR in Italy:** The likely scope of Textiles EPR in Italy will include clothing, footwear, leather apparel, home textiles, and accessories.
- ❖ **EPR labelling requirements:** A digital labelling system will be introduced, requiring producers to describe the characteristics and fibrous composition of textiles, as well as to highlight the possible presence of non-textile parts<sup>33</sup>.
- ❖ **Obligated companies:** Similarly to the Netherlands and Sweden, in addition to local companies, foreign companies that sell textiles to customers in Italy would have obligations.
- ❖ **Eco-modulated EPR fees:** The eco-modulated EPR fee concept would be applied, where producers of easier-to-recycle products would be charged lower EPR fees and producers of harder-to-recycle products would be charged higher EPR fees.
- ❖ **Compliance options:** Collective compliance (i.e., PRO membership) or individual compliance will be permitted<sup>34</sup>. [Erion](#), an existing PRO for various waste streams in Italy, has begun plans to form a PRO for textiles in Italy<sup>32</sup>. [ERP](#), also an existing PRO for various waste streams in Italy, will also operate a PRO for textiles<sup>35</sup>.

## United Kingdom

In the UK, consumers buy more clothes per person than any other country in Europe and the amount of clothes purchased per person is rising. Every year in the UK alone, almost 300,000 tonnes of old clothing arises as waste in household bins. 23 million returned garments were sent to landfill or incinerated in the UK last year, which generated 750,000 tonnes of CO<sub>2</sub> emissions, according to the British Fashion Council.

The UK's [2018 Waste/Resources Strategy \(updated in 2023\)](#) stated that by the end of 2025, the UK Government will have reviewed and consulted on EPR measures for five new waste streams, including textiles, bulky waste (e.g., mattresses, furniture & carpets), construction & demolition materials, vehicle tyres, and fishing equipment. In 2023, the UK Government announced an expected delay, stating that progress first needs to be made implementing and assessing the new EPR system for packaging before EPR for other waste streams can be considered.

WRAP has published a [Textiles Policy Options](#) report which highlighted how WRAP has worked with the UK Government to recommend EPR mechanisms that would best fit a Textiles EPR system in the UK. WRAP engages the Textile sector through its Policy Working Group on an ongoing basis as part of the [Textiles 2030](#) initiative, providing a sounding board between Defra and industry. WRAP also calculated expected costs to implement a Textiles EPR system. These indicative costs would be recovered in full if an EPR system were to be introduced.

- ❖ WRAP estimated that start-up costs for a Textiles EPR system would be approximately £9.7 million.
- ❖ The costs of establishing new infrastructure to support a Textiles EPR system are estimated to reduce over time, starting at £102 million per year for over 10 years.
- ❖ The UK consumption of garments is approximately 1.1 million tonnes per annum. Garments weigh on average 330g per item, so a fee of £0.10 per garment sold in the UK would bring over £300 million.

WRAP engages the Textile sector through its Policy Working Group on an ongoing basis as part of the [Textiles 2030](#) initiative, providing a sounding board between Defra and industry.

The UK Fashion & Textile Association (UKFT) is leading the creation of a £4 million automated sorting and pre-processing plant for non-renewable textiles. The plant has the potential to divert tens of thousands of tonnes of waste textiles from landfill each year<sup>36</sup>. Establishment of such infrastructure could encourage the UK Government to adopt an EPR system for the textiles waste stream. UKFT is also exploring the implications of EPR for the UK fashion and textile industry via an '[EPR data sandbox](#)' project. The project aims use data from industry to ensure that the system is fair for all obligated companies.

## Finland

In Finland, ~44% of end-of-life textiles from households are already separately collected<sup>37</sup>. In 2023, Finland introduced a new Law requiring municipalities to make separate collection bins for textile waste available to all Finnish citizens.

Finland has not implemented an EPR system for textiles. However, ahead of EU member states being required to introduce separate collection of textile waste by 2025, the Finnish city of Lahti is piloting an incentive-based system for recycling textiles with the hope of inspiring change in consumer behaviours<sup>38</sup>. The pilot in Lahti allowed residents to exchange a bag of textiles for vouchers for local services (e.g., local leisure facilities).

## Denmark

In 2023, the Danish Parliament discussed whether a Bill on increased product liabilities for the textile industry should be produced; however, no progress has been made. By July 2023, all municipalities in Denmark must provide textile collection systems to all households<sup>39</sup>.

Implementing Textiles EPR in Denmark could reduce textile consumption by 1,660 tonnes and reduce the waste fees of citizens by DKK 165 million (\$24 million). It is estimated that the socioeconomic cost of implementing Textiles EPR in Denmark is DKK 159 million (\$23 million)<sup>40</sup>.

## Greece

Greece planned to adopt Textiles EPR before the end of 2023<sup>41</sup>. No progress has been made to date.

## Belgium

Belgium does not currently have a mandatory Textiles EPR system. In 2022, the Belgian Fashion Federation Creamoda, the Federation of Belgian Textile Care, and the Professional Federation of Manufacturers, Distributors & Service Providers jointly presented [Circletex](#).

Circletex established a national collection system to collect textile waste, sort the waste for reuse, and recycle the waste into new textile products. The Circletex initiative is open to companies based inside and outside of Belgium and covers consumer clothing & accessories, professional clothing & accessories (e.g., workwear), interior decorations (e.g., curtains), household linen, and exterior articles (e.g., tents). Notably, the Circletex initiative is not an EPR system, it simply organises the link between producers, collectors, and processors in exchange for an online platform membership fee.

## Chile

Textile waste is a significant problem in Chile. 66,000 tons of clothes reside in an informal landfill in Chile's Atacama desert and the landfill is now visible from space<sup>42</sup>. In 2016, Chile passed a Law that makes producers accountable for six waste streams, none of which were textiles. Chile's EPR Law was implemented in September 2023<sup>43</sup>.

Chile's [Circular Economy Roadmap](#) has a plan to adopt Textiles EPR. Furthermore, the Chilean Ministry of Environment's circular economy office have stated that a team is working to add three more product types to the EPR Law, including textiles<sup>44</sup>. The United Nations are also giving recommendations to Chile on Textiles EPR systems<sup>45</sup>.

The Ministry of Environment formed a Strategic Committee in 2023 for the development of the Circular Economy Strategy for textiles. The role of the Strategic Committee is to develop a proposal for Textiles EPR<sup>46</sup>.



## Norway

106,000 tonnes of textiles were put on the market in Norway during 2022, averaging 19.3 kg per inhabitant<sup>47</sup>. Norway is a net importer of textiles, with less than 5% local production and in 2020, there were approximately 670,000 tonnes of textiles in use in Norway<sup>48</sup>.

A working group for Textiles EPR was commissioned by the Norwegian Ministry of Climate & Environment in September 2022<sup>49</sup>. The working group consisted of members from The Federation of Norwegian Enterprise (Virke), The Confederation of Norwegian Enterprise (NHO), The Norwegian Waste Management & Recycling Association, Samfunnsbedriftene (The Association of Municipal Enterprises), Fretex, Future in our hands, and Friends of the Earth Norway.

The working group was tasked with providing a basis of knowledge that would be required for the introduction of a Textiles EPR system and to provide recommendations on how a Textiles EPR system could be designed for Norway.

- ❖ **Scope of Textiles EPR in Norway:** “Any product, regardless of the mixing or assembly process employed, which consists mainly of textile fibres or leather.”<sup>49</sup>

This includes clothing (incl. workwear and uniforms), footwear, bags, accessories, household textiles (e.g., bed linen, towels, tablecloths, blankets, and non-attached carpets), and healthcare textiles. Products which are not mainly composed of textiles are not counted as textiles. This includes furniture, mattresses, and carpets.

- ❖ **Obligated companies:** Any company that brings textiles into circulation on the Norwegian market for the first time will have obligations<sup>49</sup>. Foreign companies that place products on the Norwegian market via online platforms will also have obligations.

Furthermore, regarding obligations for foreign companies, the concept of ‘Authorised Representatives’ would be applied; whereby, foreign companies would be required to appoint a national ‘Authorised Representative’ in Norway to fulfil EPR obligations on their behalf.

- ❖ **Eco-modulated EPR fees:** It was advised that environmental authorities should require Producer Responsibility Organisations (PROs) to develop a basic model for eco-modulation, based on material or product type as soon as possible<sup>49</sup>.
- ❖ **Compliance options:** Producers must be members of a PRO<sup>49</sup>.

In Norway, the degree of chemical fibre-to-fibre recycling is expected to increase from almost zero today to approximately 8,000 tonnes by 2040, which will then return to the textile industry as recycled material<sup>48</sup>.

# WRAP Textiles Expertise

WRAP currently works with over 130 organisations in the textiles industry, including ASDA, Primark, ASOS, Marks & Spencer, Next, Tesco, Sainsburys and eBay to tackle textiles (*e.g., developing clothing durability standards, establishing best practice on circular design, promoting alternative business models for clothing, improving re-use and recycling infrastructure, establishing take-back schemes, and developing textile regeneration technologies*). A list of companies that WRAP is working on textiles with is available [here](#). WRAP has established or supported various initiatives, action plans, and campaigns based around textiles, including:

## ❖ Textiles 2030

WRAP's initiative to harness the knowledge and expertise of UK leaders in sustainability to accelerate the industry's move towards circularity and system change within the UK. A [video](#) published online summarises the initiative well.

## ❖ Sustainable Clothing Action Plan (SCAP) 2020

SCAP is an industry lead action plan. WRAP's voluntary agreement brought fashion brands, retailers, textile recyclers, and industry experts together for long term collaboration to reduce the water, waste, and carbon impacts of clothing. The initiative achieved a 21.6% reduction in carbon and 18.2% reduction in water footprint of items placed on the market by participating organisations.

## ❖ Love Your Clothes™ campaign

This campaign changed the way UK consumers buy, use, and dispose of their clothing.

## ❖ Textiles Action Network

Bringing together businesses, governments, and citizens across the globe with initiatives designed to transform the landscape of the textiles industry. Nations set-up their own national action plans (tailored to local context) and share best practices and knowledge to work towards one international goal (i.e., to create a circular economy for fashion and textiles).

In March 2023, WRAP [published](#) information on how they have worked with Defra on Textiles EPR and how EPR can be used for the textiles industry in the UK. The publications included a Textiles Policy Options report and a Textiles Cost Benefit Analysis report.



Environmental Audit  
Committee

*“The work that WRAP has done to document the impact of fashion consumption and bring business together to share best practice and facilitate change is commendable.”*

*“We want to make a sustainable difference rather than deliver ad-hoc activity that can't be measured and sustained over time, and that's where WRAP's Textiles 2030 initiative is uniquely placed to help us embed circularity at the heart of our business.”*

**TESCO**

# Conclusion

The total volume of greenhouse gases emitted from textiles production annually is 1.2 billion tonnes. 8% - 10% of all global greenhouse gas emissions come from clothing and footwear. It is therefore imperative that this problematic waste is tackled.

The need for systems to manage textile waste has become significantly more apparent in recent years and consequently, Textiles EPR systems are emerging around the world. WRAP believes there is an opportunity to work with governments and business across the world to tackle the ever-growing problem for textile waste and that EPR plays an important role.

WRAP can provide guidance and expertise relating to existing or potential EPR systems for textiles across various countries, regions, and territories. WRAP has the expertise to support stakeholders across the EPR value chain, including governments, policymakers, producers, manufacturers, brand owners, retailers, collectors, sorters, municipalities, waste management organisations, and other non-governmental organisations. WRAP can provide such support through partnership agreements, in an advisory capacity, and as a co-delivery partner.

Contact WRAP if you would like to discuss Textiles EPR working in more detail.



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# Policy Digest

## Textiles Extended Producer Responsibility (EPR)

WRAP's Policy Digest summarises the key impacts of recent Textiles EPR developments for businesses and what actions businesses need to take to comply with policy changes in the short / medium / long term, helping businesses to be proactive with policy developments, rather than reactive to fast approaching regulatory deadlines.

WRAP's Policy Digest will provide subscribers with updates on Textiles EPR regulatory development around the world. The Policy Digest will may include, but will not necessarily be limited to:

- New/amended Textiles EPR legislation.
- New/amended regulator guidance publications.
- Any miscellaneous changes (or planned upcoming changes) to obligations for stakeholders from the EPR value chain.
- Establishment or structural changes to Producer Responsibility Organisations (PROs).
- Enforcement activities from regulators, incl. examples of enforcement undertakings.
- Notable stakeholder activities from across the value chain (e.g., producers, retailers, brand owners, collectors, sorters, waste management organisations, etc.).

### Deliverable Frequency

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### Subscription Cost

£2,500 per financial year (excl. VAT)

(1 April - 31 March)



# Textiles EPR Policy Digest Subscription Form

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