

Waste No More_Vietnam <Nov 2023-June 2025>

Waste No More is a coordinated initiative by GIZ and its partners, fostering collective action for the closed-loop recycling of pre-consumer waste in the apparel and footwear supply chain, as well as promoting decent work in Vietnam waste sector.

Waste No More Time - Waste No More Resource



Implemented by



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WNM@Manufacturers

Improving Waste
Management toward
Circular Textiles

1. Waste management improvement at manufacturers

- a) Divert to "Preferred waste disposal methods"
- b) Waste Data Collection & Reporting (T waste Tracker)
- c) Validation of waste disposal methods
- **2. Enhancement of implementation for traceability & accuracy** of recycled content claim at manufacturers & recyclers through RCS/GRS/CCS related training and advisory
- 3. Improvement of transparency & compliance of Waste recyclers/collectors
 - a) Improve compliance | working condition
 - b) Shared audit report of waste handlers | recyclers

Why WNM? Moving up waste disposal methods in the Waste Hierarchy

Hierarchy of Pre-consumer waste from textile & footwear factories			WasteNoMore (WNM) Viet Nam Factory Waste Improvement
Most preferred→	5	Waste Reduction	Industry-led, not within WNM scope
	4	In-house Recycling(*)	Industry-led WNM facilitates additional feedstock from other factories
	3	Closed-loop Recycling	Cotton Potential selected Polyester, CVC/TC, EVA/Rubber
	2	Downcycling	Material waste
	1	Co-processing / W2E	
Least preferred→	0	Landfill or Incineration	ZERO Landfill/Incineration

Inspired by NIKE waste hierarchy











WasteNoMore. A Collective Action FOR protecting workers' critical rights and improving working conditions at the waste sector

WNM. Baseline Survey in April 2024

Purpose: to verify the focus for WNM intervention at the program level by capturing waste management practices at apparel & footwear manufacturers.

The baseline survey (google form) was designed by a group of experts from brands, manufacturers and WNM technical team and conducted in Vietnamese.

Interviews with some respondents were conducted to verify the accuracy of the statements. The finding reported below was technically reviewed by a group of experts for the best of our knowledge.

The focuses of waste management practices that the survey want to capture are:

Sorting at source practices Internal recycling	Waste Data Collection
Audit practices at Waste contractors	Enrich the list of waste collectors/recyclers in Vietnam

Size:

- 1. N= 162 manufacturers; 75% Tier 1 (43% Garment, 24% Footwear, 8% Accessories & Gear) 25% Others
- 2. Respondents: 33% at manager/team lead; 67% at officer level

Sorting at Source Practices <after WNM. Part A. Training>

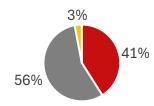
- 1. 56% of manufacturers implemented pre-sorting, emphasizing that presorting is necessary.
- 2. 31% out of 41% manufacturers without pre-sorting have plan to implement *Pre-sorting at source*
- 3. Sorting for ready (mechanical) recycling requires **refined sorting** by experienced sorting workers (*source*: ETC/Trieu Linh/ A Chau)
- 4. Sorting at manufacturers by waste collectors' workers:
 - Cost-quality justified with a large amount of waste (manufacturers >5000 workers)
 - Manufacturers have to manage the sub-contractors' workers

Verifiers and waste collector representatives said 56% of manufacturers implemented pre-sorting material waste is OVER ESTIMATED.

Some manufacturers have taken ACTION to initiate Pre-sorting project, *learnt* from WNM. Part A

Potential of pilot on *direct sourcing post-industrial (PI) waste* from large manufacturers to advanced recyclers (CIRC | SAYA...)

Percentage of manufacturers



- Sorting waste into 3 groups
- Pre-sorting material waste
- Sorting by waste collectors' worker

Sorting waste into 3 groups: Hazardous Waste, Domestic Waste and Nonhazardous Industrial Waste as required by law Pre-sorting material waste: as agreed upon with the waste collector(s)| some cases initiated by brands

Some opinions about Sorting at Source

"Nhà máy đang tìm kiếm đối tác thu gom "end-user" cho phế liệu may, từ đó sẽ kết hợp để *thống nhất phân* loại tại nguồn phù hợp với thỏa thuận"

Nhà máy đang bắt đầu tiến hành thử nghiệm phân loại phế vật liệu từ nguồn, trong đó, kho vải có sắp xếp các thùng chứa để phân tách vải thừa và lõi cuộn vải. Tại khu vực cắt, nhà máy đã tiến hành phân loại riêng các loại chất thải giấy, nilon, vải cotton, vải polyester. Tuy nhiên còn gặp nhiều khó khăn, đặc biệt phân tách giấy giác sơ đồ và nilon sau cắt từ bàn cắt di động vì mất rất nhiều thời gian để nhặt.

Nhà máy phân loại vải vụn thành 4 nhóm (100% PET, 100% cotton, 100% Nylon, vải hỗn hợp), có dán nhãn thông tin trên bao bì theo yêu cầu của nhãn hàng. Tại đơn vị thu gom, phế liệu sau phân loại của cty để chung với các nhà máy khác. Ngoài ra, đơn vị thu gom sẽ phân loại lại theo kích thước vải vụn (to, nhỏ), ko quan tâm đến thành phần vải.

"Cùng một tập đoàn nhưng chỉ các nhà máy làm cho Nike mới thực hiện phân loại sơ bộ phế vật liệu tại nguồn. Chỉ khi nhãn hàng đưa mục tiêu cho tập đoàn, lãnh đạo yêu cầu nhà máy triển khai mới có thể triển khai được."

Rất cần, nhưng có các khó khăn sau: Tổ chức và đào tạo NLĐ để thực hiện phân loại tại nguồn.

Key Takeaways & Actions on Sorting at Source

- 1. To achieve Waste Target: Pre-sorting material waste (material waste segregation) for recycling. Higg FEM SCORED!
- 2. Waste Aggregator /Collector plays the key role in sorting for recycling toward closed-loop recycling.
 - Downcycling may have low requirements on the quality/traceability of feedstock.
 - Closed-loop recycling may have higher and more technology-specific requirements.
 - Quality control and traceability shall be installed at waste aggregators/collectors
- 3. Pre-sorting at manufacturers should be made a 'common practice', economically enabled by:
 - Collaboration among manufacturers and waste contractors is necessary. Shifting toward more capable waste contractors, when required and applicable;
 - Optimization of pre-sorting (at manufacturers) and sorting for recycling (at waste aggregators);
 - Peer exchange on organising & training workers to implement pre-sorting
- 4. Prioritisation:
 - Piloting /implementing the high-quality, cost-effective and quantity-sufficient feedstock (sorting) for closed-loop recycling
 - Sorting for diverting PI waste from co-processing | waste to energy/electricity
 - Exploring & Promoting the model of waste collector workers sorting inside manufacturers

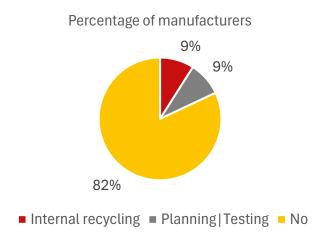
WNM. Peer Workgroup facilitates the implementation of Sorting@Source

Some sharing about Internal recycling for waste reduction

Phân tích và thúc đẩy mô hình công nhân của nhà thầu thực hiện phân loại tại nguồn (tại nhà máy) khi phù hợp.

Hiện nhà máy đang tái chế nội toàn bộ vải phế liệu có thành phần len lông cừu thành xơ, sau đó <mark>ép thành tấm padding làm chất nhồi áo jacket</mark> (nhà máy có xưởng sản xuất padding, và có riêng 1 dây chuyền làm padding tái chế từ vải vụn có thành phần len lông cừu.

Nhà máy đã đầu tư <mark>hệ thống cào xơ</mark> từ nguồn vải vụn denim thải ra từ nhà máy cắt may, tái chế sợi để sản xuất mặt hàng denim tại nhà máy, giảm lượng chất thải phát sinh. Nhà máy đã tái sử dụng 10-15% lượng vải vụn denim đầu ra cho tái chế khép kín trong nội bộ nhà máy. "



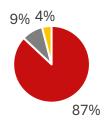
Tái chế nội bộ nhằm giảm lượng phế là cơ chế rất quan trọng, tuy nhiên, không thuộc trọng tâm hoạt động của WNM. Dừng ở mức khuyến khích chia sẻ thực hành tốt.

Waste Data Collection

About 87% of manufacturers piloted to use T-Waste Tracker to capture waste data. 13% do not consider T-Waste Tracker at the moment with following reasons:

- Too small factory, excel is sufficient
- Already having a digital tool that works
- Lack of resources
- Concern about data security

Percentage of manufacturers



- Using excel
- Using internal ERP/digital tool
- Using digital platform

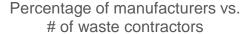
T-Waste Tracker, a digital tool for waste data management specialized for apparel and footwear manufacturers (and beyond) is provided free-of-charge with the Service Helpdesk.

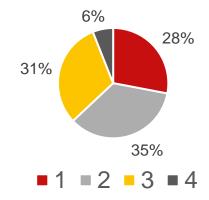
Number of waste contractors per manufacturer

- Majority of manufacturers use 1 contractor for Nonhazardous waste | material waste
- "Relationship & influencing" often plays a key role in selecting material waste contractors.
- In the South, change in waste contractors is more often than in the North. It appears healthier/market-driven in the South
- Few manufacturers reported: Their waste collectors are "qualified" & recommended by the brand

Shared by Á Châu: Several Brands and Manufacturers contacted Á Châu after WNM to discuss about contracting

192 Waste contractors provided by WNM manufacturers are 'soon' integrated into <u>List of textile waste contractors in Vietnam in Asia Garment Hub</u>





WNM. Peer Workgroup facilitates the change in waste contractor(s) toward 'qualified' ones with clarity on its network of recyclers | disposal methods & basic compliance.

WNM is working on the mechanism for qualifying waste contractors

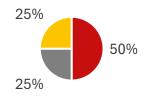
Current Practices of Auditing Waste Contractors

Paper (license) check remains the main mechanism for qualifying waste contractors'. Among waste collectors, 'license renting' or 'fake license –photoshopped of Environmental Impact Assessment' has been a practice.

8% of 162 respondents are confident in the quality of their Waste Contractor Audit report & willing to share it. 85% expressed their need for high-quality waste contractor audit reports.

- 1. Manufacturer managers do not pay attention to the RISKS of not auditing waste contractor
- Lack of tool/capability to audit waste contractors
- The web of sub-contractors/recyclers connected to waste contractors is very complex and, in many cases, inaccessible
- 4. Costs related to auditing this sector
- 5. And there is no clear direction on what to improve after an audit?

Percentage of manufacturers



- Yearly audit
- Audit once, then paper check
- No audit, only paper check

Verifiers and waste collectors agreed that the picture above is 'too rosy' compared to the reality.

From waste collector: "Nhiều nhà máy có đến chụp vài kiểu ảnh, lấy scan một số giấy tờ, không thể gọi đó là audit"

WNM is working on a mechanism for better qualifying waste contractors & sharing the audit report.

