







Recommendations for policy solutions to enhance textile fibre recycling in the EU

Presentation of results of Work Package 4

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Research question and objectives

- 1. In how far is EU policy fit for supporting & fostering textile fibre recycling in the EU?
 - Bottlenecks & regulatory barriers?
 - Policy gaps?
- 2. What are alternative & coherent policy solutions to support the industrial uptake and scale-up of textile fibre recycling activities in the EU?
 - Technological & market reality of textile fibre recycling
 - Focus on EU policy level

Applied Method

Mapping

- Literature & document analysis
- Stakeholder responses
 WP1

Qualitative expert interviews

- 10 in-depth interviews
- Experts from policy, industry, civil society

Public online survey

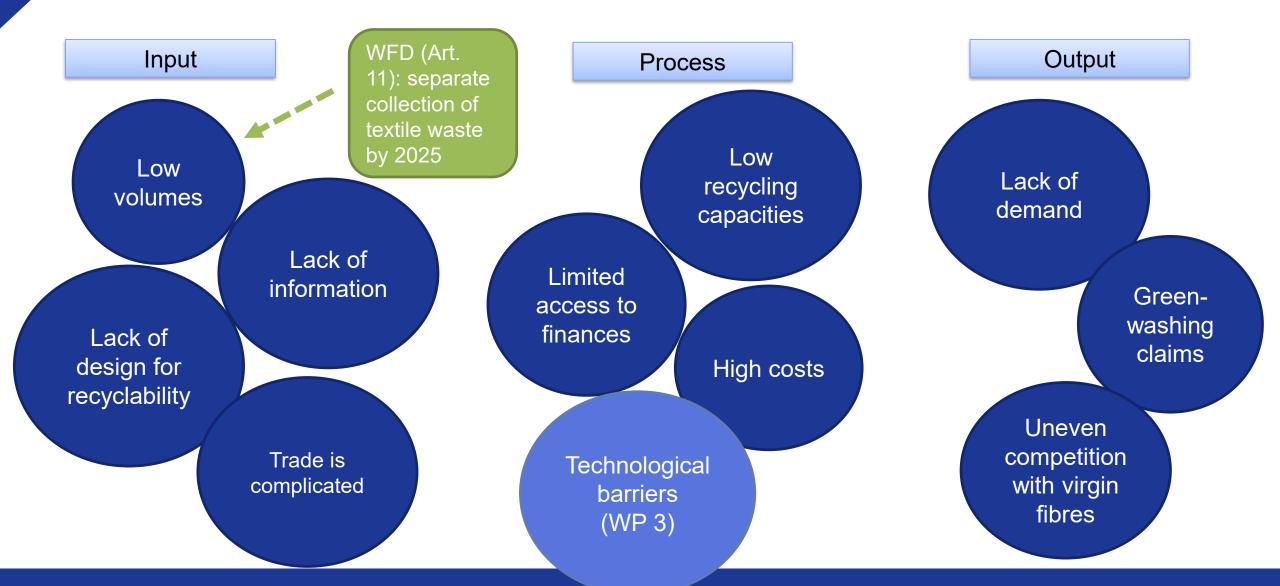
- Open from June- mid August
- 69 valid responses



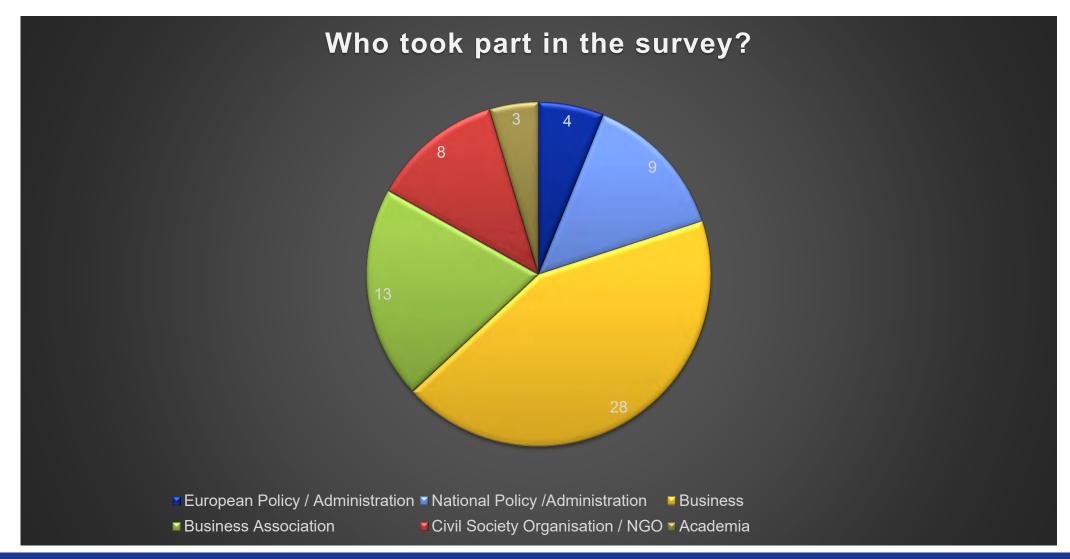




Regulatory and policy barriers identified

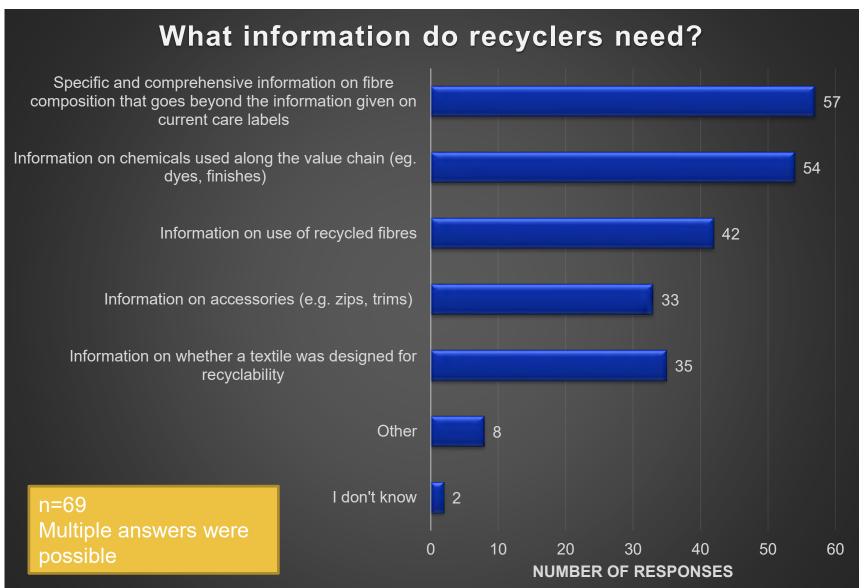


Recommendations for regulatory and policy options



Enhancing transparency





Enhancing transparency by:

1. Expanding the information requirements regarding fibre content

- More specific information on fibre content
- Information on accessories to facilitate disassembly
- Review of Textile Regulation (EU No 1007/2011)

2. Introducing information requirements for chemicals

- chemicals used along the value chain (dyes, finishes, ...)
- ensure that information is accessible for sorters & recyclers
- New policy element

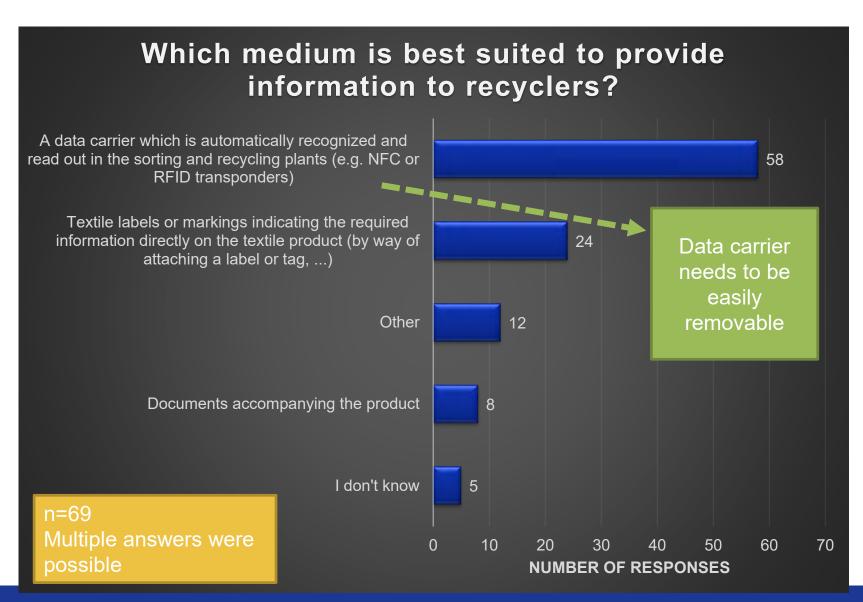
How to make this practicable for companies (easy process) and for the monitoring & enforcement?

Ease sorting by enabling automatic reading of information

To enable textile fibre recycling, the current way of labelling textiles is obsolete.

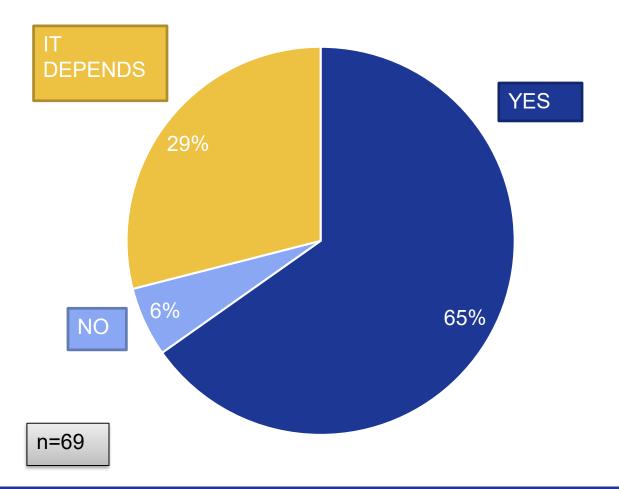
Problems with current labelling:

- Labels in garments are often missing or washed-out
- Current labels cannot be read out automatically



Introducing a digital product passport for textiles

Are you in favour of introducing a digital product passport?



Advantages perceived:

- Improve sorting efficiency
- Ease monitoring and enforcement of REACH
- Increase transparency along the value chain
- Make information load manageable

Concerns:

- Uncertainty on design of instrument
- Additional burden for companies
- Data security
- Who has access to information?

Introducing a digital product passport for textiles

What is important to consider in the design of DPP?

- Clearly regulated information access on a need-to-knowbasis
- Standardise information requirements
- Low administrative burden
- "one-stop-shop"

Examples from practice

- For the carpet sector:
 https://gut-prodis.eu/en/product-testing-gut/product-passport
- For clothing: Circularity
 ID
 https://circular.fashion/e
 n/software/circularity-id.html





Introducing minimum design requirements to ensure recyclability of textiles

Problem:

Recyclability often hampered by

- The mix of materials
- Use of chemicals that impede or complicate recycling
- Low quality of textile products
- Accessories (e.g. zips)
- Lack of dialogue between designers / producers & sorters / recyclers
- Lack of (harmonised) standards for circular textiles

Solution:

EU Ecodesign Directive (2009/125/EC)

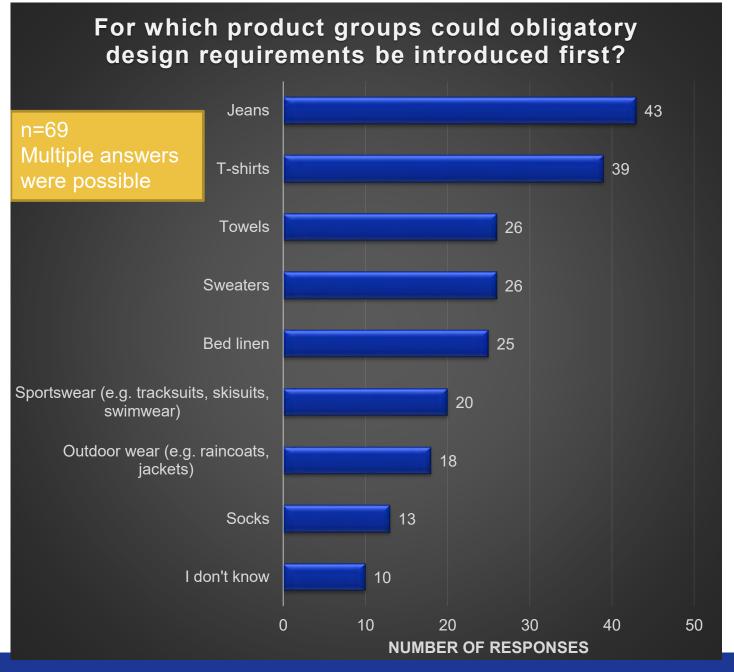
Threshold requirements for specific product groups, e.g.

- Limit the use of problematic chemicals to a certain thresholds
- Set maximum of time (in seconds) needed to remove zippers & other hardware

Promoting design for recyclability

Advantages of minimum design requirements:

- applicable to all addressed textile product groups produced in or imported to the EU
- Eliminates the worst performing textile products from the market
- investment opportunity
- Reduce amount of textile waste that needs to be incinerated, landfilled or exported



Stimulating the demand for recycled fibres by:

Introducing policy incentives to create a level playing field for circular textiles

Top 1

Introduce
 reductions of
 VAT for
 circular
 textiles,
 including
 textiles that
 contain
 recycled fibres

Top 2

• Ecomodulate
EPR fees —
with
perceptibly
lower fees for
recyclable
textiles

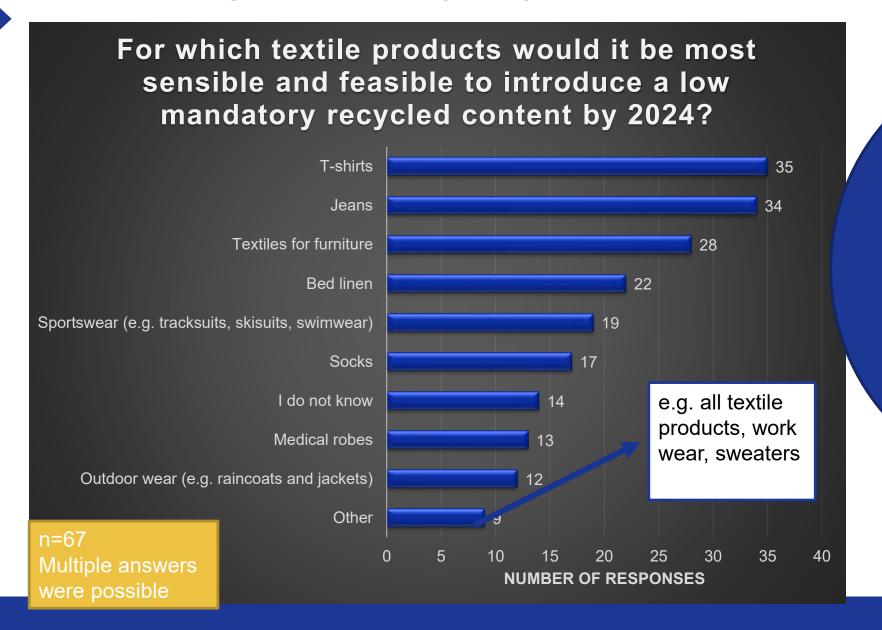
Top 3

Introduce

 labour tax
 reductions
 for circular
 business
 models,
 including high
 quality textile
 recycling &
 sorting

Address green
washing by
regulating
claims on
recycled
content

Introducing a mandatory recycled content for certain textile products

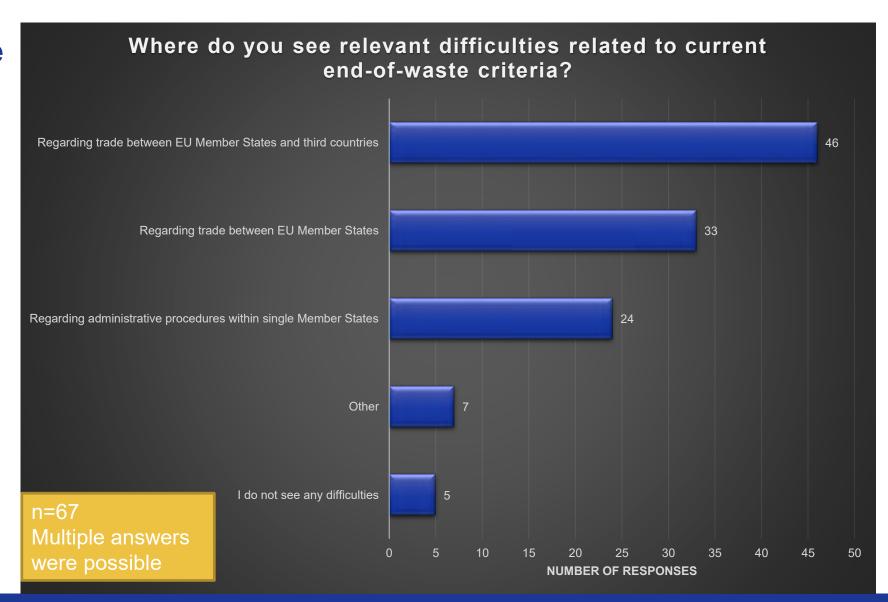


Start very low with only few selected product groups.

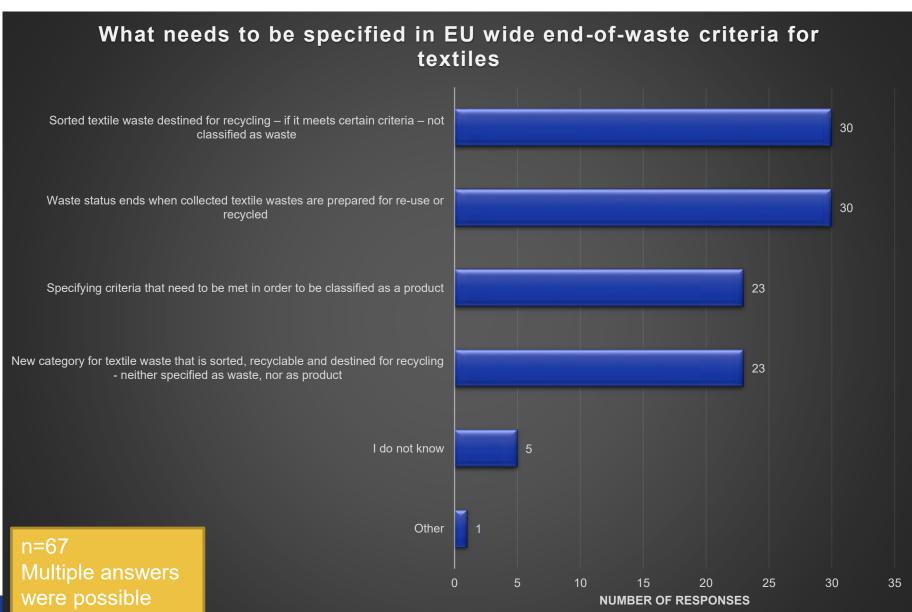
Dynamic: targets evolve as recycling technologies & capacities evolve.

Strong signal to the textile industry.

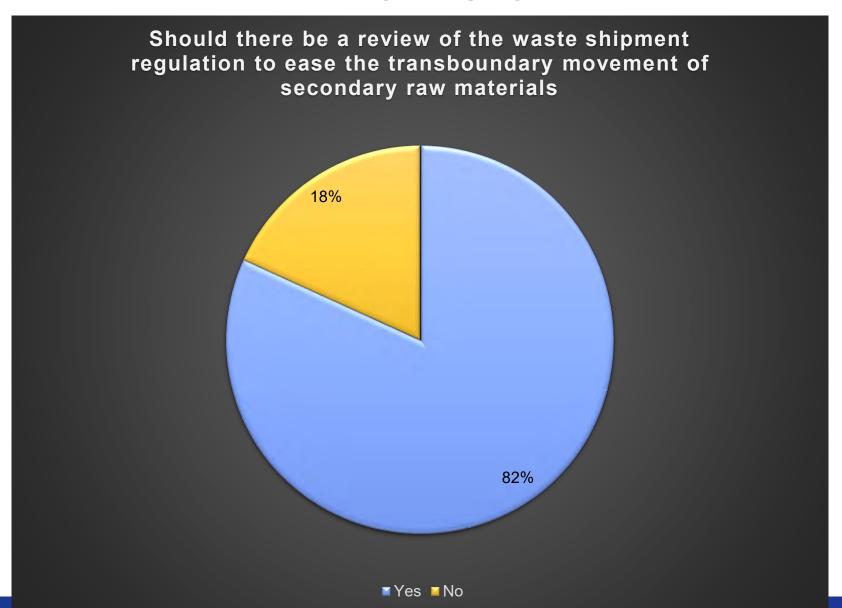
Developing EU-wide end-of-waste criteria



Developing EUwide end-ofwaste criteria



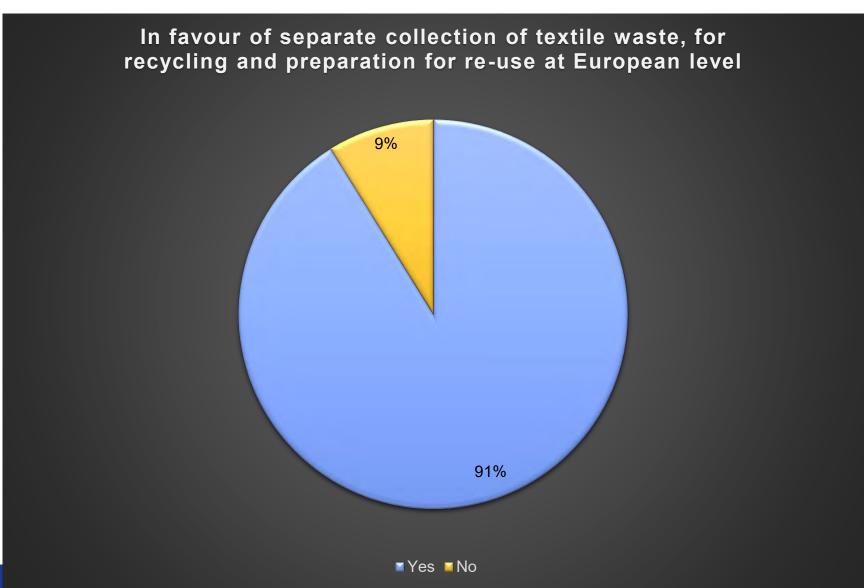
Reviewing the Waste Shipment Directive



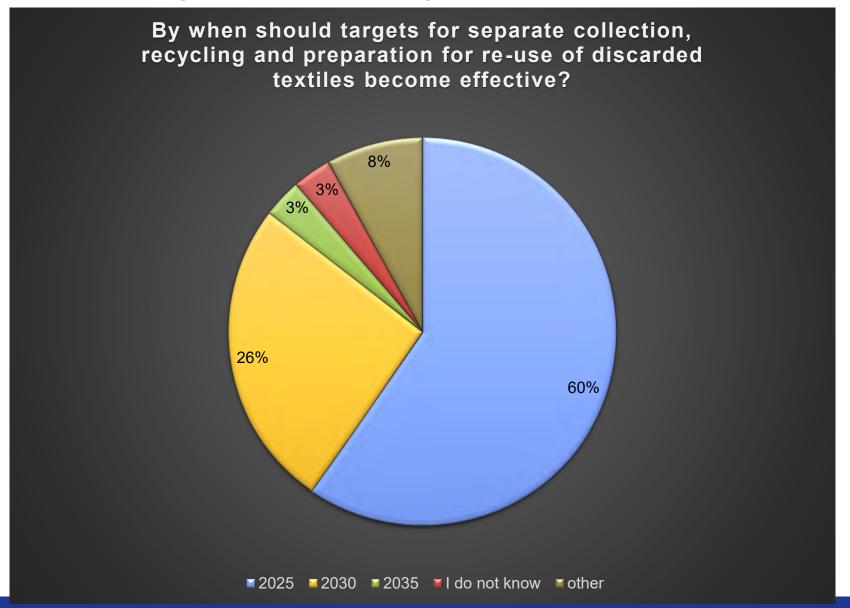
Reviewing the Waste Shipment Directive



Introducing targets for separate collection, recycling and for preparation for re-use:



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Introducing targets for separate collection, recycling and for preparation for re-use:

Targets for	Target ranges selected	Target ranges mentioned	
Separate collection	30%, 50%, 60%, 40%	15%, 80%, 90%	
Recycling	20%, 10%, 15%	30%, 50%, 60%	
Preparation for re-use	10%, 20%, 15%	50%, 60%, 90%	

Existing separate collection rates inside EU

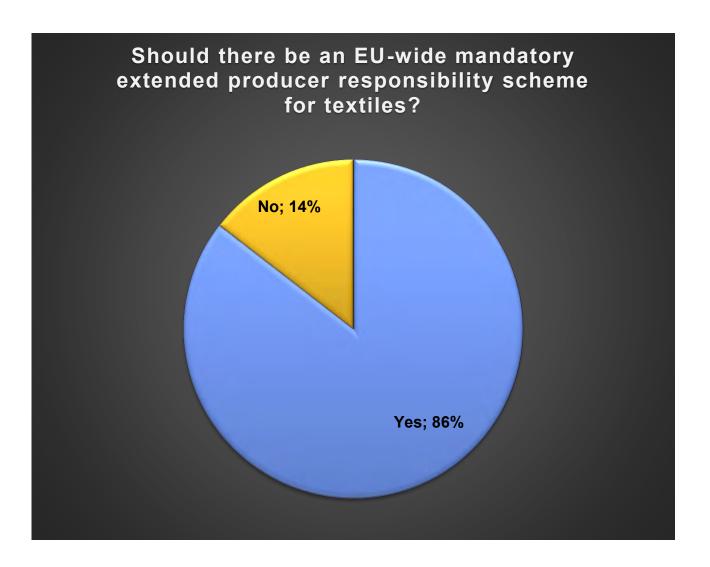
Cou (data	ntry year)	Denmark (2016)	Finland (2012)	Germany (2013)	France (2018)	Nether- lands (2018)	Sweden (2013)
Consumption of new textiles	Ktonnes	85	72	1347 ⁱ	624 ⁱ	305	121
	Kg/person	15.0	13,2	16.7 ⁱ	9.5 ⁱ	17.7	12.6
Separate colleciton of	Ktonnes	37	16	1011 ⁱ	239 ⁱ	136	23
used textiles	Kg/person	6.4	3.0	12.5 ⁱ	3.6 ⁱ	7.9	2.4
Indsamling som andel af nye tekstiler	%	43%	23%	75%	38%	45%	19%

Includes footwear

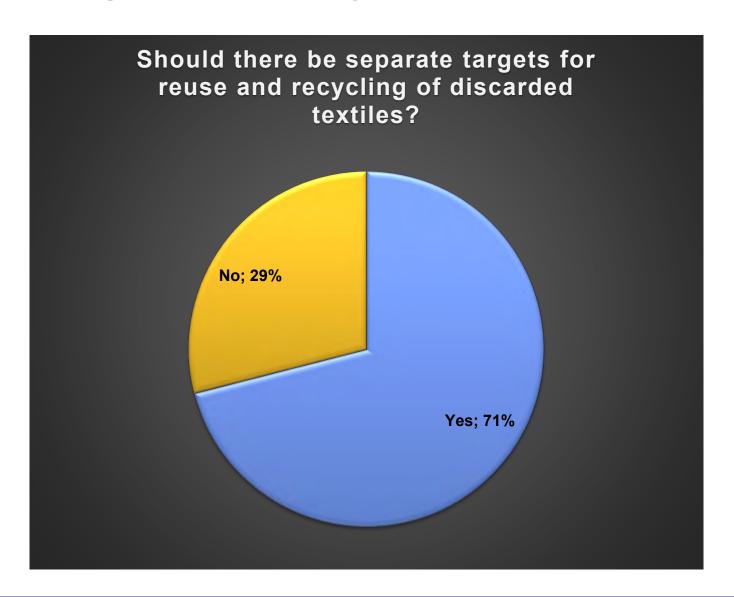
Source: see individual country chapters

Watson et al, 2020, Towards 2025: Separate collection and treatment of textiles in six EU countries: p. 7

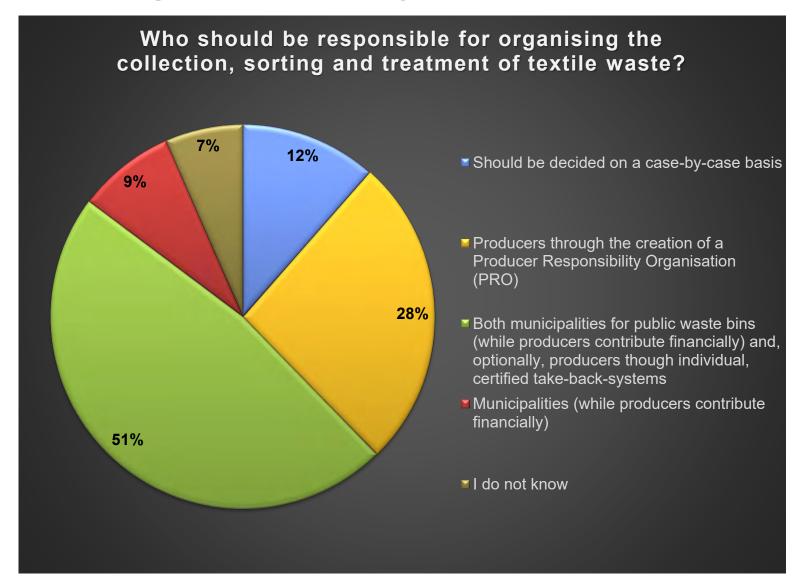
Introducing
mandatory Extended
Producer
Responsibility
(EPR) for textiles



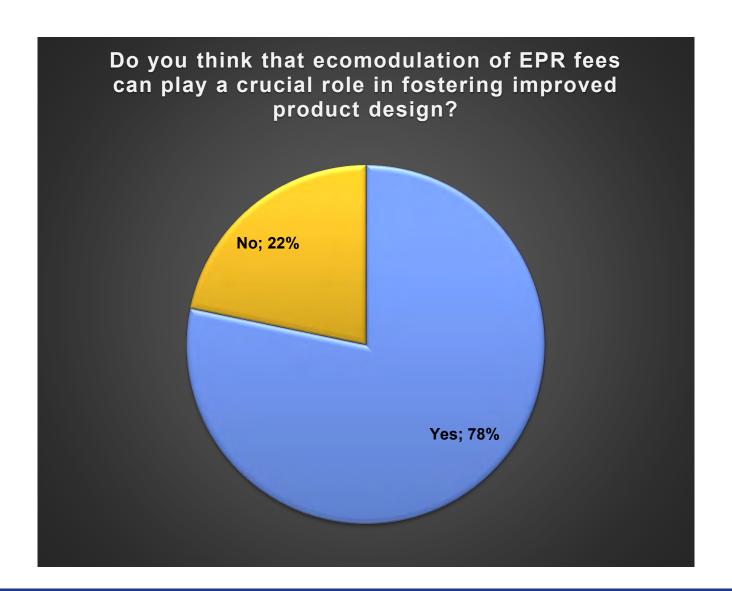
To avoid competition between collection streams for reuse and recycling in an EPR system



Operational responsibilities in an EPR system



Design of EPR to ensure improvement in product design and not only on end-oflife management of textile waste

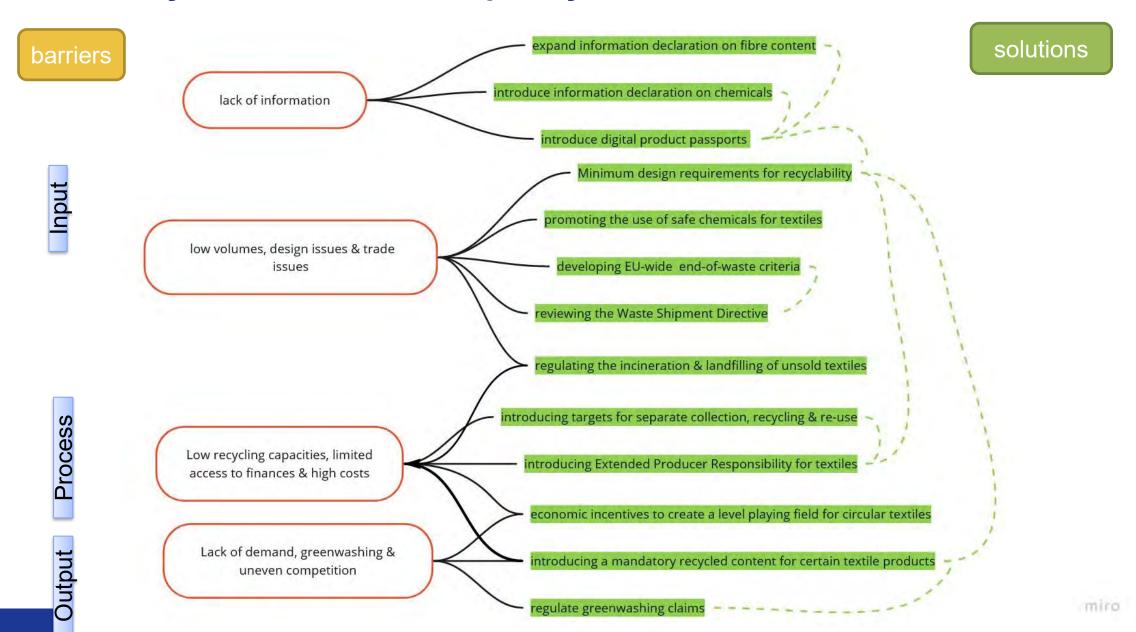


Key points on EPR highlighted in interviews and survey responses:

- EPR scheme design should prioritise reuse and preparation for reuse over recycling
- There should be separate targets for textiles collected for reuse and recycling
- Interviewees expressed concern on impact of EPR on design. Ecomodulation seen as an option, however, limited success for other materials: packaging, WEEE
- Ecomodulation in France textile EPR value is significantly lower to have an impact on producer design choices or consumer purchase decisions

- EPR scheme should not replace existing textile collection systems – municipalities and not-for-profit/charity organisations
- Financial contribution by producers to existing collection systems plus take back systems organized by the producers themselves

Summary of recommended policy solutions



Questions for discussion

- What is the basic information needed regarding chemicals used in textile products?
- What should minimum design requirements for jeans & T-shirts encompass?
- Which procedures and dialogues need to be initiated in order to discuss & introduce targets for separate collection, recycling and preparation for re-use?
- What criteria do you consider relevant to use for introducing ecomodulation of EPR fees?



Thanks! Any more Questions?

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