

ANNEX

RREUSE Response to consultation on EU Strategy for Sustainable Textiles

EXECUTIVE SUMMARY:

RREUSE calls for an inclusive EU Strategy for Sustainable Textiles which promotes the role of social enterprises — *operators in the social economy whose primary objective is to have a social, societal or environmental impact over profit* – and concretely implement the waste hierarchy. Social enterprises active in the collection, management, sorting and resale of post-consumer textiles provide circular and sustainable solutions that should be safeguarded and promoted. Respecting the structure of the Consultation on an EU Strategy for Sustainable Textiles, and to create policies that are truly sustainable and trigger the development of local, green and inclusive jobs in the EU, RREUSE recommends the following:

1. TEXTILES, A KEY SECTOR OF THE EU ECONOMY AND KEY ENABLER FOR THE RECOVERY

- Safeguard and reinforce role of social enterprises
- Mainstream repair and second-hand textiles
- Integrate social enterprises in new circular business models
- Ensure Extended Producer Responsibility (EPR) implements waste hierarchy and integrates social enterprises
- Develop skills in post-consumer textiles management
- Develop new technologies for re-use of textiles

2. CIRCULAR ECONOMY IN THE EU TEXTILE SECTOR

- Implement waste hierarchy
- Develop re-use and preparing for re-use targets
- Make right to repair textiles as inclusive as possible

- Promote usage of natural, durable, unblended fabrics
- Give information on expected lifetime
- Make recyclability compatible with reusability
- Make re-using and repairing more accessible (financially and technically)
- Develop separate collection that prioritises and facilitates re-use

3. GLOBAL COMPLIANCE, DUE DILIGENCE AND TRANSPARENCY

- Promote consistent definition of end-of-waste that facilitates re-use
- Make sanctions for non-compliance more coercive
- Control and measure (rather than limit) export of post-consumer textiles

RREUSE is a non-profit network organisation representing social enterprises active in the circular economy, notably in re-use, repair and recycling. RREUSE currently has 31 members from 26 countries in Europe and the USA, federating a wider network of approximately 850 individual social enterprises. These organisations collectively handle 1 million tonnes of goods and materials annually through which they provide job and training opportunities to over 100,000 individuals, many of whom are at risk of social exclusion. RREUSE's mission is to ensure that policies, innovative partnerships and exchange of best practices promote and develop the role of social enterprise and local inclusive jobs in the circular economy.

Introduction

As an international network of social enterprises active in re-use, repair and recycling, collectively handling around 260,000 tonnes of used textiles annually, RREUSE awaits the publication of an EU Strategy for Sustainable Textiles with anticipation. We believe that developing eco-design requirements for textiles will be a milestone in the development of products that are fit for a circular economy. To ensure textile products still hold value when reaching the second-hand market, the first step is to make them as durable as possible.

The three pillars of sustainability including environmental responsibility, social inclusion and economic viability, developing a Strategy for Sustainable Textiles in cooperation with social enterprises – *operators in the social economy whose primary objective is to have a social, societal or environmental impact over profit* – would be particularly meaningful. This would present considerable opportunities to create local, green and inclusive jobs in the EU. According to [recent social enterprise estimates](#), collecting and sorting 1.000 tonnes of textile with a view of being re-used is creating between 20 to 35 jobs.

RREUSE wants to ensure that the EU Strategy for Sustainable Textiles does not focus on recycling but instead prioritises activities related to waste prevention and preparation for re-use of waste textiles. To promote the implementation of a strategy that truly implements the waste hierarchy and foster the creation of meaningful employment and training opportunities, RREUSE calls on the Commission to implement the following recommendations:

- Help social enterprises active in the collection, sorting and resale of post-consumer textiles to safeguard and develop their activities
- Before encouraging consumers to purchase “sustainable” new textiles, support them to repair or purchase second-hand textiles in the first place
- Provide consumers with sufficient information about the negative impacts of purchasing new textiles, as well as about the positive environmental and social impacts of repairing or purchasing second-hand textiles instead
- Ensure that EPR schemes do not threaten social enterprise’ activities, notably through developing waste prevention and waste management targets following the waste hierarchy alongside social objectives
- Make textile products longer lasting, with less complex fibre blends (facilitating both re-use and recycling) and with standardised sizes
- Finance and facilitate the development of collection systems for post-consumer textiles
- Develop skills related to the prevention and sustainable management of waste textiles
- Avoid considering that investments in R&D and treatment facilities are only needed in the recycling sector (they are also needed for textile waste prevention and preparing for re-use)
- Ensure that the development of new business models do not compete with re-use operators and with consumers and independent repairers’ right to repair
- Clarify the end-of-waste status in a way that facilitates collection and helps prioritise re-use over recycling
- Severely sanction producers/designers of products that are non-compliant with EU’s legislative requirements (e.g. the same way planned obsolescence is sanctioned in France)
- Control and measure (rather than limit) the export of post-consumer textiles for re-use, reducing administrative burden while ensuring that the waste hierarchy is respected

In addition to these demands and those that can be found in the “[Recommendations for the EU Strategy for Sustainable Textiles](#)” developed by the Wardrobe Change Coalition (of which RREUSE is a member) and in “[The Civil Society Shadow European Strategy for Sustainable Textile, Garments, Leather and Footwear](#)” (co-signed by RREUSE and a number of its members), RREUSE would like to give more details on the logic behind its responses to the ongoing consultation:

1. TEXTILES, A KEY SECTOR OF THE EU ECONOMY AND KEY ENABLER FOR THE RECOVERY

1.1. How would you assess the relative importance of the following factors in promoting sustainability while ensuring resilience and competitiveness of the Textile Industry?

- RREUSE has mixed feelings about “***Supporting the uptake of circular business models among consumers (e.g. product-as-a-service, leasing, customised design)***”:

Encouraging producers/importers to develop product-as-a-service and leasing models can have the unintended consequence to trigger the development of monopolies for the management of used textiles, at a time when we need as many actors as possible to be involved in these activities. It is not yet demonstrated that these models automatically produce less waste or promote longer lasting products¹. Also, these models risk competing with the activities of social enterprises that are currently providing job and training opportunities to people at risk of socioeconomic exclusion through their post-consumer textiles collection, management and resale activities.

If these new circular business models end up being financially supported by the EU, it will be essential to ensure that social enterprises have a role in their development. The expertise of these actors in the sustainable management of post-consumer textiles will be invaluable to the implementation of greener business models. Supporting the development of social enterprises is considered as a priority in the EU: an [Action Plan for Social Economy](#) will be developed by the end of the year. Therefore, it is the uptake of circular and social – or sustainable – business models that should be supported. The EU Strategy on Sustainable Textiles should investigate solutions that will help social enterprises develop these new circular business models themselves or partner with enterprises who wish to implement them.

- RREUSE suggests adding the following factor to the list provided in question 1.1: “***Providing economic operators with the necessary information about the positive environmental and social impacts of social enterprises active in the resale, repair and recycling of textiles***”:

One of the three pillars of sustainability is social impact. The sustainability and resilience of the Textile Industry will benefit greatly from a prominent role of social enterprises active in that sector. These

¹ The Guardian, [Renting clothes is ‘less green than throwing them away’](#) (2021)



actors already implement business models that are sustainable, inclusive and circular: their role should be recognized and promoted towards the economic operators.

- RREUSE believes that if ***“the conditions to ensure sufficient flow of recycled materials”*** must be created, there is also a need to ***“create the conditions to ensure sufficient flow of second-hand textiles”***:

The EU is facing new requirements under the Waste Framework Directive to separately collect textiles by 2025. This will result in a significant increase in the quantity of textiles being collected and - if not well managed – in a subsequent increase in volumes exported. While textile exports for reuse will continue to play an important role in the future, they represent a loss in value of reusable items and associated environmental and social impact to the local market. We believe it is critical to support greater levels of local reuse and repair through investments in infrastructures (particularly in partnership with social enterprises) and other measures. This will not only support the social benefits of reuse but will also improve the environmental benefits of post-consumer textiles management (through reduced transport), support the local economy and build local resilience.

- In addition to ***“Providing economic operators with the necessary information about environmental and social impacts of textiles along the whole value chain”***, the EU has an opportunity to take a leadership role in **developing an EU-wide convention for labelling that requires transparency**:

Many re-use and recycling operators complain that the accuracy of the information accessible on labels is not guaranteed. Labelling transparency to clearly identify the fabric blends in textile products is essential to facilitate better management of waste textiles. This would not only help some forms of reuse, upcycling and downcycling but would facilitate the better separation of textiles by category for recycling. Where EPR schemes are in place, the modulation of fees would also encourage - alongside more transparent labelling - producers to place materials that are more recyclable on the market.

1.2. Which of the tools listed below should be given priority at EU level to recover from the crisis and promote resilience and sustainability of the textile industry?

- RREUSE remains cautious with the suggestion to ***“Require Member States to implement mandatory Extended Producer Responsibility for textiles (and footwear)”***:

As explained in detail in [this position paper on EPR](#), as well as in this [paper developed with the “Wardrobe Change Coalition”](#), EPR can be counterproductive if implemented without clear targets on waste prevention and preparing for re-use. It also bears risks of disrupting the collection activities currently conducted by social enterprises. If producers/importers are responsible for the collection and management of waste textiles, we can expect recycling to be prioritised over prevention and preparing for re-use. Requiring Member States to implement mandatory Extended Producer Responsibility for textiles (and footwear) should go together with an obligation for Producer Responsibility Organisations or producers to guarantee that collection models and sorting facilities will prioritise re-use over recycling and promote circular design. Specific targets on textiles re-use could be developed, [as it is currently discussed in the Netherlands](#). Safeguarding a share of EPR fees



to social enterprises re-use activities, [as this will be the case in France](#), can also be a way to encourage socially and environmentally responsible re-use.

- In addition to “**Promot(ing) the development of skills applicable to sustainable textile production (e.g. design, product development)**”, consider **promoting the development of skills in post-consumer textiles management (e.g. repair, sorting out, re-use, upcycling, remanufacturing)**:

The development of skills should not be considered only for the design phase. Jobs in the post-consumer textiles management will have to be created to cope with the increasing quantities of clothes that will be collected once the mandatory separate collection of waste textiles kicks in (2025). In fact, and considering that a successful implementation of circular policies should make the quantity of textiles produced and placed on the EU market decrease, support for textile workers currently dependent on the existing system of overconsumption is required to provide for a just transition and support a fair circular economy. In addition, measures are needed to incentivise the reuse, repair and upcycling of waste fabrics (e.g. financial reward to companies that partner with reuse or upcycling initiatives to use waste fabrics and materials).

1.3. In your opinion which of the following technologies will contribute most to support a competitive and sustainable textile sector in the EU?

In this section 1.3, the focus is clearly on technologies that are related to the production and the recycling of textiles. However, a circular economy approach is required involving the entire life cycle of textiles including technologies supporting circular design and reuse.

With regards to technologies supporting the competitiveness of the textile sector, there exists a lot of room for complimentary technologies to human labour in the collection and sorting process for used textiles. They should help improve re-use rates, confirm the economic viability of re-using post-consumer textiles, create new jobs / training opportunities and improve the conditions of workers involved in these activities. The objective should not be to replace manpower with machines in the name of cost reduction. Such technologies can include support infrastructure for collection and sorting through to sales and marketing of used textiles.

For example:

Digital donations & e-commerce platforms for re-use of goods: Many social enterprises selling second-hand textiles have developed or are thinking about developing online e-commerce platforms ([Thriftify](#) and [Label Emmaüs](#)) in order to maximise their sales. Donation apps and platforms are of high interest for re-use operators to make it easy for citizens to donate goods to social enterprise and buy second-hand ([Fairwertung](#), [Sachspenden.at](#), [Trëmma](#)).

Further developments in AI and computer vision technology being trialled in a number of contexts could also help re-use operators identify the condition and value of a used item just by taking a picture. Such tools help to make the of processing used textiles items more efficient and increase the volume of used clothing placed on the second-hand market.

Sorting of used textiles: There exist a great many ways to improve the efficiency of the textile sorting process. For example, the [JRC's Circular Economy Perspectives in the EU Textile sector](#) (page 73), provides an example of sorting technology aiding workers in their activities. It consists of using your voice, through a headset, to classify textile by material, quality and texture. Similar techniques could also be investigated, trialled and replicated.

Other technologies that would facilitate the differentiation between re-usable textiles and textiles that cannot be re-used (because overly stained, damaged by holes or discoloration, etc.) could also be developed.

2. CIRCULAR ECONOMY IN THE EU TEXTILE SECTOR

2.1.1. Which elements of circularity in the value chain do you consider should be tackled as a priority?

- **“Ensuring repair services and consumers rights to repair”** should be as inclusive as possible:

Repairing textiles products should be possible for both consumers and independent repairers. Attempts to develop monopolies on the repair of textiles, for example through giving access to repair information, spare parts or fabrics to a selected number of authorised repairers or making the repair of a textile product possible only at the shop of the retailer, should be prohibited.

2.2. Raw materials

2.2.1. Which element of raw material selection do you consider should be prioritised in order to promote sustainability?

- RREUSE suggests adding this following element: **“Promoting the utilisation of quality raw materials that make textile products durable and easy to maintain”**:

Avoiding the use of mixed fibres and plastic based fibres, beyond making textile products easier to recycle, also raise their value and make them easier to sell second-hand.

Encouraging designers to use recycled materials is a good solution to reduce the environmental impact of the textile industry. However, this should not compromise the purity of the materials used. If using recycled content means blending several materials together and making products difficult or impossible to recycle, there is clearly an issue. The use of recycled materials should not compromise the durability, the quality, the non-hazardousness and the recyclability of products.

2.4. Design of products

2.4.1. In order to facilitate the transition to a more circular economy, how would you assess the relative importance of the following product features?

- **“Technical durability and information on the expected lifetime”** are essential features for the reusability of textiles:

The longer textile products can last, the higher the chance they will reach the second-hand market in a decent condition. To inform consumers about the expected lifetime of textile products, RREUSE would recommend using the number of washes after which the product starts to wear in a noticeable way. This number could be accessible next to the logo informing the consumer about the recommended washing temperature.

To accompany any labelling initiatives, a public awareness and education campaign is essential to encourage consumers to pay attention to maintenance recommendations.

- **“Reusability: upgradability, modularity, size and shape flexibility”** and **“Lower resource demand for care and maintenance (e.g. require less frequent laundering, lower temperature, easy/no iron etc.)”** should not go against recyclability:

RREUSE understands the need to look into upgradability, modularity, size and shape flexibility as product features. However, there are risks that these features will compromise recyclability in the long run. Shape flexibility might require a blend of organic and plastic fabrics that will be difficult to recycle. Same issue with product features that lower resource demand for care and maintenance.

RREUSE believes that it is possible to address both durability/reusability and recyclability. As explained previously, textile products that are easy to recycle (because containing only one type of organic fibre) are often those that are of higher quality and that easily find their way to second users. Therefore, to enhance reusability, it is important to choose solutions that do not compromise recyclability.

- **“Availability of information on product repair”** and **“Product design facilitating maintenance and repair activities and availability of spare parts”** should be inclusive:

Information on product repair and spare parts must be accessible to consumers and independent repairers too (not only to retailers or authorised repairers as it is often the case for electronics). These features should also be accessible at a reasonable price.

- RREUSE also suggests adding the following product features:
 - **“Reusability: Standardised sizes”**:

Too often, clothes' sizes do not mean the same depending on which country the product comes from or on which brand designed the product. This confuses consumers and discourages them to visit second-hand shops (they fear to spend too much time trying clothes before finding the right size). This is also a serious limitation to the purchase of second-hand clothes online. Such standardisation should

be based on an objective measurement and avoid the usage of terms that can feel discriminatory (eg. Small, Medium and Large). This would also limit the practice of purchasing several sizes of the same item online, a practice which is common for consumers who want to receive at least one item that fits (and which is facilitated by free return policies). This proposal should be taken into account when reviewing the labelling of textiles.

- **“Reusability: Ease of disassembly and durability of components”:**

Repairers should be able to replace the parts that are quickly wearing with spare parts that are, themselves, durable. For example:

- Zippers that break often and are difficult to remove and replace
- Elastic bands that are often sewed in instead of just being laced in
- Etc.

- **“Reusability: Gender neutrality”:**

For young children’s clothing, **gender neutrality** is also a feature that can help increase reusability. This would, for example, facilitate the transmission of clothes between siblings, at least until a certain age.

2.4.2. How can the environmental impact from microplastics shed from clothing/textiles best be tackled without causing environmental problems in other areas?

RREUSE agrees with **“Developing eco-design measures, such as essential requirements per fibre type (e.g. filament, staple fibre) that ensure low shedding rates”**, unless these measures require complex blends or designs that will reduce their reusability/recyclability.

2.5. Consumption Behaviour

2.5.1. How would you assess the relative importance of the following measures to promote sustainable consumption behaviour at EU level?

- In the suggestion to **“Encourage economic incentives to buy sustainable/circular textiles (e.g. through differentiated taxation levels depending on products’ resource efficiency)”**, RREUSE insists that second-hand textiles are included in the definition of **“sustainable/circular textiles”**:

As they take precedence in terms of resource efficiency, incentives for **repairing clothes** or **purchasing second-hand textiles** (such as reduced or zero VAT) should be more rewarding than those that will encourage people to buy new **“sustainable/circular”** textiles. Working on **educating consumers and mainstreaming second hand goods** through driving demand and investing in marketing should also be investigated.

- RREUSE suggests adding the following measure: **“Thoroughly measure textiles placed on the EU market and post-consumer textile flows”**:

This will help identify what policies are needed to drive down the consumption of new textiles and foster the uptake of second-hand textiles and repair services.

2.5.2. Which of the following business models contributing to a circular economy do you believe have most potential for economic viability and upscaling?

- RREUSE strongly advises against collection models based on the **“Take-back and resell of own brand products”**:

These practices are very likely to trigger the creation of monopolies that will threaten the textile repair and re-use sector. Take-back and resell of clothing exists for decades and is implemented by independent operators, a lot of them being from the social economy sector. Encouraging brands/retailers to collect back their own products will seriously impact these activities that are providing job and training opportunities to people at risk of socio-economic exclusion.

In addition, when collecting post-consumer textiles, retailers often incentivise discarders to purchase new items thanks to vouchers. This practice is in opposition with the development of sustainable consumption and simply encourages the purchase of new clothes.

2.6. Post-consumer textiles reuse and recycling

2.6.1. How would you assess the relative importance of the following challenges to a greater reuse of used textiles? (note that challenges to recycling are considered later)

- RREUSE admits that there is still a **“Lack of separate collection systems for post-consumer textiles and textile waste”**:

Bearing in mind the mandatory separate collection of textiles that will start in 2025, these collection systems need to be more widespread and tailored to the needs of discarders. This requires significant investments in new infrastructure. Different forms of collection points in places that are usually busy (offices, public spaces, supermarkets, etc.) should be experimented to identify what are the best solutions to maximise collection. Digital tools such as smartphones’ applications (eg. [DonateNYC](#) in New York, [Altkleiderspenden](#) in Germany or [Sachspenden](#) in Austria) should be developed to help discarders locate the places where they can donate/discard textiles. As many stakeholders as possible should be involved in the collection of post-consumer textiles and textile waste, and access to this material should be given to social enterprises in priority.

These collection models should also be more communicated and financially supported by municipalities or EPR schemes when they exist. Some municipalities are still making collectors of used textiles pay for the right to set up collection containers on their territories, even though it is in

municipalities' interest to let collectors settle down, notably thanks to the resulting reduced cost of waste management.

- RREUSE believes that the **“Saturation of global markets for second-hand textiles”** is overrated and should not justify a focus on recycling activities:

It is true that the overconsumption of textiles, which itself results from the low price, durability and quality of new textiles, makes the absorption of second-hand textiles by the global market more difficult. However, looking at the number of unsold clothes that get discarded, it is possible to say the same of new textiles.

RREUSE does not believe that the global market for second-hand textiles can be considered as being saturated. The export of used textiles is still practiced by a great number of re-use operators, demonstrating that this market does exist. In no case should the assumption of a saturated global market for second-hand textiles lead policy makers to believe that recycling is the main solution for re-usable but redundant textiles.

However, it is necessary for the quantity of new textiles put on the EU market to drastically decrease and for the local demand for second-hand textiles to be fostered through developing local behaviour change and creating local markets for re-use as a priority. The proximity principle should be kept in mind so that the proportion of used textiles collected in the EU that is re-used in the EU (or preferably in the region/country where it is collected) is the highest possible.

- RREUSE suggests adding the following challenge to a greater reuse of used textiles: **“Lack of separate targets for preparing for re-use/re-use to be implemented at national/regional level”**

It is suggested in section 2.6.2 that there is a **“Lack of targets for reuse and recycling to be implemented at national level”**. RREUSE would prefer to mention, in this section 2.6.1, the **lack of separate targets for preparing for re-use/re-use to be implemented at national/regional level**.

The updated Waste Framework Directive features an obligation for Member States to report their preparing for re-use rates separately from recycling rates as well as to monitor data on re-use. By the end of 2024, the European Commission must look into the feasibility of setting separate quantitative targets for re-use and preparation for re-use rates². Re-use and preparing for re-use targets, whether applied within the framework of an EPR scheme or not, are essential to enhance cooperation between all actors of the re-use value chain (preparing for re-use and re-use operators, municipalities, waste management operators, producers, PROs and retailers). Examples of national and regional re-use and preparing for re-use targets can be found in Spain, Flanders and France.

- RREUSE suggests adding the following challenge to a greater reuse of used textiles: **“Lack of concrete legal implementation of the waste hierarchy”**

The whole questionnaire, and particularly section 2.6 gives the reader the impression that recycling is prioritised over waste prevention and preparing for re-use. The mere fact that 200 characters are left

² [RREUSE \(2018\), RREUSE position on the updated EU Waste Framework Directive](#)



to the respondent to complete section 2.6.1 on re-use whilst 500 characters are available for section 2.6.2 on recycling translates this approach. The EU Strategy on Sustainable Textiles needs to concretely implement the waste hierarchy and :

- Decrease the overall consumption of new textiles
 - Improve the price competitiveness of reused textiles and repair compared to new textiles (e.g. through economic instruments)
 - Increase utilisation of reused textiles by ensuring its quality/safety/durability
 - Act on the lack of demand from end-consumers (households and public bodies) for second-hand textiles
- RREUSE suggests adding the following challenge to a greater reuse of used textiles: **“Coping with non-reusable textiles”**

In the post-consumer textiles value chain, re-use operators are often the first to conduct sorting operations. This means that they will be the first to cope with the share of collected textiles that is non-reusable. A first classification between what can be recycled and what must be directly landfilled / incinerated often happens at this stage. Managing this non-reusable share is costly and reduces the viability of re-use activities.

To support the re-use sector, it is essential to also finance the collection, sorting and disposal of the non-re-usable fraction. Financial support from municipalities or EPR schemes (if they exist) should be investigated to cover these costs. However, by doing so, and following the principles of the waste hierarchy, it is important to make sure that re-use remains more financially interesting than recycling for re-use operators.

3. GLOBAL COMPLIANCE, DUE DILIGENCE AND TRANSPARENCY

3.1. Which of the following aspects are in your opinion more effective to promote sustainability (including fair wage, decent working conditions and labour and human rights) across the value chain?

As a general comment to this section, RREUSE is calling for robust employment legislation to be required in every country from which textiles are imported. In particular, there is a need for strict supply chain responsibilities including guarantees of fair pay for textile workers in non-EU-countries, based on respective national norms or at least on ILO norms.

- **“Ensuring consistency on definitions of waste/non-waste with respect to used textile collection”** should facilitate the re-use of post-consumer textiles:

Clarifying the definitions of waste and non-waste is a prerequisite to the smooth management and flow of used textiles. However, a balance must be found between unregulated collection and movement of used textiles and collection which would be too costly and administratively burdensome.

Classifying used textile collection points as waste collection points might make it difficult to set them up in certain places where environmental regulation forbids to set up waste management facilities. However, it is also important to ensure that what is collected in used textile collection points will be sorted out to separate waste items from re-usable textile. Beyond a mere clarification on definitions of waste/non-waste, the Commission should look into:

- Making post-consumer textile collection points easy to set up in places that are accessible and visible to discarders
- Ensuring that collected used textile will go to sorting facilities that will, according to a transparent process, separate residual waste from re-usable items and recyclables
- Ensuring that what is considered as re-usable after the sorting process is considered as non-waste

3.2. Which of the following instruments should be given priority to ensure that imported textiles materials and products comply with EU's legislative requirements?

- RREUSE suggests adding the following instrument: **“Severely punishing producers/importers putting products that do not comply with EU's legislative requirements on the EU market”:**

For example, in France, planned obsolescence is a felony punished with up to two years of imprisonment and €300.000 fines.

After a certain number of products declared as non-compliant with EU's legislative requirements, the individuals responsible for the design of these products should be forbidden to operate.

3.3. Which of the actions listed below should be given priority to ensure that separately collected post-consumer textiles in the EU are processed and treated with due diligence to the waste hierarchy, environmental protection, human and labour rights and decent working conditions abroad?

The best way to ensure that separately collected post-consumer textiles are properly processed and treated is to re-use these products as locally as possible, notably where it is easier to ensure that the waste hierarchy, environmental protection, human and labour rights and decent working conditions are respected. It is already in the social/environmental objectives and in the financial interest of social enterprises active in the collection and resale of post-consumer textiles to maximise the share which is re-used locally. However, while waiting for EU policies to mainstream more circular business models, exporting used textiles remains the best solution to extend the lifetime of products that do not meet their demand locally. To limit the unintended negative consequences of exporting used textile, we need:

- To support operators that are prioritising local re-use over direct export
- To help operators finance the pre-sorting of post-consumer textiles
- To make it gradually more difficult (even though not impossible) to export post-consumer textile, depending on the status of what is exported (re-usable, recyclable or unsorted).



- More transparency on the destination of what is exported
- More transparency on the status of the exporters/beneficiaries (e.g. commercial recyclers vs charities)
- More support (through EU budget or EPR) for importing countries to properly deal with end of life management of post-consumer textile

For more information please contact Mathieu Rama, Senior Policy Officer – Mathieu.rama@rreuse.org , www.rreuse.org

Public Consultation on the EU Strategy for Sustainable Textiles

Fields marked with * are mandatory.

Introduction

The [European Green Deal](#), the [Circular Economy Action Plan](#) (CEAP) and the [Industrial Strategy](#) identified textiles as a priority sector in which the EU can pave the way towards a carbon neutral and circular economy, and announced an EU Strategy on textiles. The strategy will be developed taking into account:

- The recovery needs identified in the context of the [Recovery Plan](#), in the light of current and expected weaknesses on both the demand and supply sides following the impact of the pandemic
- The preparation of the [Sustainable Products Initiative](#)

The questionnaire is divided into:

- General information about the respondent
- Main consultation questions:
 - Support to the recovery, resilience, sustainability and competitiveness of the sector
 - Opportunities and challenges for increased circularity along the value chain
 - International dimension of the strategy, due diligence and transparency

About you

* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English
- Estonian
- Finnish
- French

- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

* First name

Mathieu

* Surname

RAMA

* Email (this won't be published)

mathieu.rama@rreuse.org

* Organisation name

255 character(s) maximum

RREUSE

* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

* Please specify your sector:

- Agriculture, forestry and fishing
- Textile, apparel, footwear
- Chemicals and chemical products
- Construction
- Electrical equipment
- Computers, electronic and optical products
- Food and beverages
- Materials (e.g. metals, plastics, paper)
- Retail & wholesale trade
- Banking, insurance, reinsurance and pension funding
- Accommodation and food service activities
- Other

If "Other", please specify:

200 character(s) maximum

Social enterprises active in re-use, repair and recycling

Please specify the type of product your organisation produces or represents:

- Intermediate product (e.g. ingredient or component for a final product)
- Final product (used as it is)
- Both intermediate and final products

- Other (e.g. services)

* Please specify your main activity (or as an umbrella organization, the activities of your members):

- Manufacturer of textiles, clothing or footwear
- Brand/retailer of new textiles, clothing, or footwear
- Provider of textile services (leasing, repair, digital platform owner, etc.)
- Collection of used textiles and footwear for reuse (non-waste)
- Waste collection (public or private)
- Processing/wholesale of collected used textiles and/or textile waste
- Second-hand retail
- Recycling and/or remake/redesign
- Technology researcher or developer on textiles, clothing or footwear
- Other

If "Other", please specify:

200 character(s) maximum

Our members can fit in 5 of these categories: Collection of used textiles and footwear..., Waste collection..., Processing/wholesale..., Second-hand retail, Recycling and/or remake/redesign

* Please indicate the level of market(s) you are active on:

- Local market
- Regional market
- EU market
- Non-EU market
- Worldwide market
- Not applicable

Transparency register number

255 character(s) maximum

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

05052317999-60

* Country of origin

Please add your country of origin, or that of your organisation.

- Afghanistan
- Djibouti
- Libya
- Saint Martin

- Åland Islands
- Albania
- Algeria
- American Samoa
- Andorra
- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Dominica
- Dominican Republic
- Ecuador
- Egypt
- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Liechtenstein
- Lithuania
- Luxembourg
- Macau
- Madagascar
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar/Burma
- Namibia
- Saint Pierre and Miquelon
- Saint Vincent and the Grenadines
- Samoa
- San Marino
- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden

- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States

- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba
- Curaçao
- Cyprus
- Czechia
- Democratic Republic of the Congo
- Denmark
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- Lesotho
- Liberia
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Saint Helena
Ascension and
Tristan da Cunha
- Saint Kitts and
Nevis
- Saint Lucia
- United States
Minor Outlying
Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and
Futuna
- Western Sahara
- Yemen
- Zambia
- Zimbabwe

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association', 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the [personal data protection provisions](#)

Main Questions

1. TEXTILES, A KEY SECTOR OF THE EU ECONOMY AND KEY ENABLER FOR THE RECOVERY

1.1. How would you assess the relative importance of the following factors in promoting sustainability while ensuring resilience and competitiveness of the Textile Industry?

	Very important	Important	Not very important	Not important	I do not know/ no opinion
Mobilising funding and investments to support innovation (advanced materials technologies, green production technologies, advanced multifunctional products) and digitalisation (e-commerce, monitoring of value chains, business models)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Using sustainably sourced fibre types	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Designing textiles for circularity (e.g. durable, repairable, ease of disassembly, recyclable)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Using production processes where use of hazardous substances, waste generation and use of water are limited	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring textiles put on the EU market have proven low environmental footprint along the entire life-cycle	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Providing consumers with the necessary information about environmental and social impacts of textiles	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Providing economic operators with the necessary information about environmental and social impacts of textiles along the whole value chain	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Supporting the uptake of circular business models among consumers (e.g. product-as-a-service, leasing, customised design)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Creating the conditions to ensure sufficient flow of recycled materials (e.g. acting upon prices, facilitating shipment of waste or supporting industrial symbiosis)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Ensuring proper and sustainable functioning of global value chains (e.g. compliance with environmental, human and labour rights)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you think that additional factors not listed above should be considered, please specify:

200 character(s) maximum

Providing economic operators with the necessary information about the positive environmental and social impacts of social enterprises active in the resale and recycling of used textiles

Would the reply above differ, depending on whether it is clothing, home textiles or technical textiles?

If yes, please specify:

500 character(s) maximum

--

1.2. Which of the tools listed below should be given priority at EU level to recover from the crisis and promote resilience and sustainability of the textile industry?

(Please rate the choices below from 1 to 5, with 1 denoting low preference and 5 denoting high preference)

	1	2	3	4	5	I do not know/ no opinion
Provide technical and business assistance to promote green and digital technological innovation and product development	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Propose regulation and policy frameworks (e.g. for emerging technologies and processes)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Set binding requirements at EU level to foster product sustainability	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Require Member States to implement mandatory Extended Producer Responsibility for textiles (and footwear)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Facilitate SMEs short-term access to finance	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promote the development of skills applicable to sustainable textile production (e.g. design, product development)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Establish measurable mandatory criteria in public procurement through sectorial legislation and monitoring their implementation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Support and encourage the application of economic instruments (e.g. taxation)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promote voluntary instruments on eco-labelling	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Raise awareness among consumers to support the market for sustainable textiles	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you think that additional options not listed above should be considered, please specify:

200 character(s) maximum

Targets on collection and re-use/preparing for re-use of textiles by social enterprises Development of skills in used textile management (e.g. repair, sorting out, re-use, upcycling)

1.3. In your opinion which of the following technologies will contribute most to support a competitive and sustainable textile sector in the EU?

	1	2	3	4	5	I do not know/ no opinion
Advanced manufacturing (e.g. computer-aided manufacturing, automatisisation, robotics)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Customisation, production on-demand and virtualisation (e.g. digital twins, bodyscanners, 3D-printers)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Automated sorting of textile waste by fibre type and colour	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fibre-to-fibre recycling of single fibre type waste (e.g. 100% cotton, 100% polyester etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fibre-to-fibre recycling of fibre blends (e.g. polycotton etc.)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Open loop recycling of textiles into high-value non-textile products	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Digital passport/tagging (e.g. reading of bill of materials, chemical content of products)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Production of innovative technical and smart textiles	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you think that additional technologies not listed above should be considered, please specify:

200 character(s) maximum

Social enterprises selling second-hand textiles have developed online platforms (eg. Thriftify and Label Emmaüs) in order to maximise their sales. R&D investments are needed to develop these platforms

2. CIRCULAR ECONOMY IN THE EU TEXTILE SECTOR

2.1. Overview – full value chain

2.1.1. Which elements of circularity in the value chain do you consider should be tackled as a priority?

(Please rate the choices below from 1 to 5, with 1 denoting low preference and 5 denoting high preference)

	1	2	3	4	5	I do not know/ no opinion

Designing textile products for durability, ease of repair, ease of disassembly and ease of recycling	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Reducing the environmental impact of textiles production	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Promoting slow fashion (e.g. slowing down the rate of clothing consumption)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Supporting circular business models so that products are used longer and more often by one or more consumers until they are no longer fit for use	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Ensuring repair services and consumers rights to repair	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Ensuring transparent, traceable, verified consumer and business information (e.g. on material and chemical content, environmental and social aspects)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Ensuring that no textile products are landfilled/incinerated without ever having been used (e.g. unsold clothes)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Transforming used clothing/textiles and the fabrics they contain into new clothing (e.g. remaking)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Recovering fibres from textile waste and using these to produce new textiles products (e.g. fibre-to-fibre recycling)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Recovering fibres from textile waste and using these to produce other products (e.g. downcycling)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you think that additional options not listed above should be considered, please specify:

500 character(s) maximum

<p>Designing textile products for durability, ease of repair and ease of disassembly should be prioritised over designing for recycling</p> <p>Impact assessments on new circular business models</p> <p>Ensuring repair services and consumers rights to repair involve independent repairers</p>
--

2.2. Raw materials

2.2.1. Which element of raw material selection do you consider should be prioritised in order to promote sustainability?

(Please rate the choices below from 1 to 5 (with 1 denoting low preference and 5 denoting high preference))

	1	2	3	4	5	I do not know/ no opinion
--	---	---	---	---	---	------------------------------

Promoting the utilisation of sustainably sourced/produced fibre types in the EU and globally (e.g. through certification)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Making available information on the environmental profile of different fibre types and textile products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Improving the price competitiveness of recycled fibres compared to virgin fibres (e.g. through economic instruments)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Acting on the inconsistent definitions/ classification of waste/ non-waste/ secondary resources/ end-of-waste between Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Increasing utilisation of secondary resources by ensuring quality/safety/durability of recycled content yarns and fabrics	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Improving knowledge / awareness of designers on the characteristics and functionality of recycled content yarns and fabrics	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Acting on the lack of demand from end-consumers (households and public bodies) for recycled content in clothing and textiles	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you think that additional elements not listed above should be considered, please specify:

200 character(s) maximum

Promoting the utilisation of natural, unblended and quality fibre types that make products longer lasting

2.3. Production processes

2.3.1. Which of the actions listed below should be given priority to promote more environmentally friendly production processes?

(Please rate the choices below from 1 to 5, with 1 denoting low preference and 5 denoting high preference)

	1	2	3	4	5	I do not know/ no opinion
Reducing fibre/fabric waste through more efficient production and confection processes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Reducing emissions to water, soil and air from production processes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Avoiding/limiting the use of hazardous substances	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Using renewable energy and promotion of energy efficiency in production facilities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Promoting water reuse by production facilities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Enhancing interactions between stakeholders in the production chain to increase sustainability of production processes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you think that further actions not listed above should be considered, please specify:

200 character(s) maximum

All of the above requires mandatory EU due diligence rules and full transparency and traceability on material and chemical composition of textile products through the digital product passport

2.4. Design of products

2.4.1. *In order to facilitate the transition to a more circular economy, how would you assess the relative importance of the following product features?*

(Select from following options for each feature: very important, important, not very important, not important, no opinion)

	Very important	Important	Not Very important	Not important	I do not know/ no opinion
Technical durability and information on the expected lifetime	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Less sensitive to trends, focused more on timeless design	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reparability: Availability of information on product repair	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reparability: Product design facilitating maintenance and repair activities and availability of spare parts	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information on the environmental impacts of the product over its whole life-cycle from raw materials to re-use and disposal.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reusability: upgradability, modularity, size and shape flexibility	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Lower resource demand for care and maintenance (e.g. require less frequent laundering, lower temperature, easy/no iron etc.)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Recyclability: ease of disassembly, reduced fibre blends, avoidance of chemicals that hamper recycling, information on material and chemical content	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Avoiding the presence of hazardous substances	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increased content of recycled fabrics or fibres	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increased content of natural and sustainably grown fibres	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you think that other features not listed above should be considered, please specify:

200 character(s) maximum

Availability of spare parts and fabrics at a reasonable price for consumers and independent repairers
Standardised sizes to facilitate the resale of second-hand textiles (particularly online)

2.4.2. How can the environmental impact from microplastics shed from clothing /textiles best be tackled without causing environmental problems in other areas?

(Please rate the choices below from 1 to 5 with 1 denoting low preference and 5 denoting high preference)

	1	2	3	4	5	I do not know/ no opinion
Reducing the use of synthetic fibres in textile products in favour of natural fibres	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Supporting and developing manufacturing processes able to reduce fibre-shedding from products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Capturing microplastics in washing machines/ washer-dryers/ tumble-dryers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Developing eco-design measures, such as essential requirements per fibre type (e.g. filament, staple fibre) that ensure low shedding rates	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Labelling products according to their level of microplastics release	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Supporting technologies to separate microplastics from sludge in waste water treatment plants	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Research on better understanding of the causes of microplastics emissions and identification and development of technical solutions to tackle the issue.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you think that other actions not listed above should be considered, please specify:

200 character(s) maximum

Set maximum thresholds for the amount of synthetic microfibres released during production, use and end of life, and consider industrial pre-washing and waste-water filtering.

Do you have any other comments about product design?

500 character(s) maximum

Make textiles products longer lasting, with less complex fibre blends (facilitating both re-use and recycling) and with standardised sizes

2.5. Consumption Behaviour

2.5.1. How would you assess the relative importance of the following measures to promote sustainable consumption behaviour at EU level?

(Select from following options for each measure: very important, important, not very important, not important, no opinion)

	Very important	Important	Not very important	Not important	I do not know/ no opinion
Provide information for consumers (e.g. on expected lifetime of clothing/ textile products, reparability, care of use, respect of human rights and environmental footprint)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further promote the EU Ecolabel for textile products and footwear to consumers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Provide stronger protection of buyers against false and misleading information in environmental claims (greenwashing)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Organise EU-wide awareness campaigns, education and training to promote sustainable textiles use and address overconsumption (e.g. fast fashion)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Provide/support platforms/websites promoting repair of clothing/textiles	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Raise awareness of and incentivise new business models (e.g. for sharing, rental of textiles)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improve (and increase consumer awareness of) rules on legal and commercial guarantees and shift the burden of proof from consumers towards producers/retailers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Encourage economic incentives to buy sustainable/circular textiles (e.g. through differentiated taxation levels depending on products' resource efficiency)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you think that further measures not listed above should be considered, please specify:

200 character(s) maximum

Encourage economic incentives to repair or buy second-hand textiles (e.g. through differentiated taxation levels) Supporting the development of the second-hand sector through targets

2.5.2. Which of the following business models contributing to a circular economy do you believe have most potential for economic viability and upscaling?

(Please rate the choices below from 1 to 5, with 1 denoting low preference and 5 denoting high preference)

	1	2	3	4	5	I do not know/ no opinion
Selling quality durable products with high personal value (e.g. partially designed by or tailored for the consumer)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Take-back and resell of own brand products	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Second-hand retail (of others' products)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Leasing/rental services for consumer (e.g. baby clothing subscriptions)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Consumer to Consumer exchanges of products (e.g. wardrobe sharing for accessing/sharing clothing)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Business to Business leasing/rental services, such as textiles for hospitals, kitchens, hotels.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Repair and fitting services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Redesign of used textiles/textile waste into new products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you think that other options not listed above should be considered, please specify:

200 character(s) maximum

Take-back and resell of own brand products can threaten repair and re-use
Leasing/rental can be useful for sporadic usage but should not be promoted for normal usage (risks of rebound effects)

Do you have any other comments about the consumption phase?

500 character(s) maximum

The impact of new business models on the environment should be monitored to avoid the development of monopolies or the triggering of rebound effects.

2.6. Post-consumer textiles reuse and recycling

2.6.1. How would you assess the relative importance of the following challenges to a greater reuse of used textiles? (note that challenges to recycling are considered later)

(Select from following options for each challenge: very important, important, not very important, not important, no opinion)

	Very important	Important	Not very important	Not important	I do not know/ no opinion
Lack of separate collection systems for post-consumer textiles and textile waste	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Saturation of global markets for second-hand textiles	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Lack of European businesses' demand for second-hand clothing and textiles	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Lack of knowledge among collectors and sorters of global markets for second-hand textiles	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Lack of options for consumers to access second-hand clothing and textiles (e.g. new business models)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lowering quality of new textiles placed on the market	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Falling global prices for second-hand clothing reducing the economic viability of used textile collection	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you think that further challenges not listed above are of high importance, please specify:

200 character(s) maximum

Overconsumption and low price of new textiles (leading to the saturation of the market for second-hand textiles)
Lack of separate and concrete re-use/preparing for re-use targets

2.6.2. How would you assess the relative importance of the following challenges to *recycling* of post-consumer waste textiles into new textiles in the EU?

(Select from following options for each challenge: very important, important, not very important, not important, no opinion)

	Very important	Important	Not very important	Not important
Lack of markets and capacities for textile waste recycling including textile-to-textile recycling	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Lack of targets for reuse and recycling to be implemented at national level	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of traceability of chemical content in textile waste	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Lack of automated sorting capacity of textile waste by fibre type and colour	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Lack of data on the overall fibre composition and fibre blends of textile waste collected in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Lack of investments in sorting and recycling technologies	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Textile products not designed for ease of disassembly or ease of recycling (e.g. use of complex fibre blends)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Lack of new techniques that make it possible to separate material and fibre blends while keeping the value	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Lack of economically viable and sustainable chemical recycling technologies especially for fibre blends	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Lack of demand for recycled content yarns and fabrics from brands/producers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Insufficient cooperation/exchange of information along the value chain (e.g. between brands, textile manufacturers, recyclers and waste collectors)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
High labour costs in Europe for redesign / upcycling/ textile production	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
High costs of logistics for waste transportation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Regulatory/administrative obstacles to the transport of textiles waste across borders	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you think that other obstacles not listed above are important, please specify:

500 character(s) maximum

Targets for re-use should have been suggested in the previous table separately from recycling

Do you have any other comments about enabling factors to promote increased collection, reuse and recycling of post-consumer textiles?

500 character(s) maximum

Support social enterprises active in the collection, the sorting and the re-use of textiles through granting them regular financial support (through GPP, EPR, national/regional/local budgets, etc.).
Encourage consumers to repair their products or buy second-hand with vouchers or ecocheques.
Encourage new cooperation between social enterprises, retailers, brands in new circular activities

3. GLOBAL COMPLIANCE, DUE DILIGENCE AND TRANSPARENCY

3.1. Which of the following aspects are in your opinion more effective to promote sustainability (including fair wage, decent working conditions and labour and human rights) across the value chain?

(Select from following options for each: very important, important, not very important, not important, no opinion)

	Very important	Important	Not very important	Not important	I do not know/ no opinion
Better integration of social sustainability into EU Green Public Procurement criteria for textiles and setting targets for green public procurement of textiles in Member States	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Better integration of social sustainability into the EU Ecolabel textiles products and footwear and increased promotion of the EU Ecolabel amongst consumers	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promotion of harmonized certifications of sustainably produced textiles including compliance with UN's guiding Principles for Business and Human Rights	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Public private partnerships that engage in improving sustainability, including labour- and human rights across the value chain	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Encouraging European brands /producers to engage in Voluntary Agreements on taking greater responsibility for upstream working conditions, labour rights, job security etc	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Ensuring better enforcement of the Trade and Sustainable Development (TSD) chapters of free trade agreements with third countries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Developing specific guidance on textiles to supplement the EU horizontal due diligence rules in the upcoming sustainable corporate governance initiative covering environmental protection, human and labour rights	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Legislation ensuring that textiles placed on European markets have been produced under minimum standards for human rights and labour rights	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Monitoring businesses compliance with OECD Due Diligence Guidance applicable to textiles	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

EU external action and development funding directed to projects on social inclusions, environmental awareness, etc	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Exchange and promotion of best practice between brands, producers and recyclers across global value chains.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring consistency on definitions of waste/non-waste with respect to used textile collection	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you think that other actions not listed above should be considered, please specify:

500 character(s) maximum

“Ensuring consistency on definitions of waste/non-waste with respect to used textile collection” is important, provided that the solutions do not produce barriers to the re-use of textiles while making sure that sham re-use is prevented. There should be simple ways for textile re-users to demonstrate that what they sell is reusable.

3.2. Which of the following instruments should be given priority to ensure that imported textiles materials and products comply with EU’s legislative requirements?

(Please rate the choices below from 1 to 5 with 1 denoting low preference and 5 denoting high preference)

	1	2	3	4	5	I do not know/ no opinion
Guidance in EU’s legislative requirements placed upon imported goods, including free trade agreements	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Customs controls - market surveillance	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Economic incentives for compliance with sustainability standards	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Application of tracing technologies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Cooperation with online marketplaces	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

If you think that other instruments not listed above should be considered, please specify:

500 character(s) maximum

Severe sanctions in cases where products are not compliant with EU's legislative requirements (prohibition to operate, heavy fines and prison sentences)

3.3. Which of the actions listed below should be given priority to ensure that separately collected post-consumer textiles in the EU are processed and treated with due diligence to the waste hierarchy, environmental protection, human and labour rights and decent working conditions abroad?

(Please rate the choices below from 1 to 5 with 1 denoting low preference and 5 denoting high preference)

	1	2	3	4	5	I do not know/ no opinion
Requirement for Member States to report on the processing and eventual destination of separately collected post-consumer textiles and textile waste	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Establishment of a third party verified code of conduct for actors collecting and processing post-consumer textiles including verification of appropriate treatment of textiles exported to third countries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Specify obligations for exporters to ensure and verify that textile waste exported to third countries are managed in an environmentally sound manner.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Developing specific guidance on textiles for collectors and processors of post-consumer textiles including environmental compliance and social conditions downstream as supplementary to the EU horizontal due diligence rules in the upcoming sustainable corporate governance initiative	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Establishing a voluntary agreement with the post-consumer textiles industry on environmentally and socially responsible collection and processing of post-consumer textiles including downstream elements	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Economic incentives for compliance by collectors and processors with sustainability standards	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Education and training in due diligence	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Development of EU level criteria to differentiate between used or second hand clothes and textile waste.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

If you think that other actions not listed above should be considered, please specify:

500 character(s) maximum

Optional Additional Comments

If you wish to add further information, comments or suggestions (relevant to the scope of this Public Consultation), please do so here:

2000 character(s) maximum

RREUSE calls for an inclusive EU Strategy for Sustainable Textiles which promotes the role of social enterprises — operators in the social economy whose primary objective is to have a social, societal or environmental impact over profit – and concretely implement the waste hierarchy. Social enterprises active in the collection, management, sorting and resale of post-consumer textiles provide circular and sustainable solutions that should be safeguarded and promoted. Respecting the structure of the Consultation on an EU Strategy for Sustainable Textiles, and to create policies that are truly sustainable and trigger the development of local, green and inclusive jobs in the EU, RREUSE recommends the following:

1. TEXTILES, A KEY SECTOR OF THE EU ECONOMY AND KEY ENABLER FOR THE RECOVERY
 - Safeguard and reinforce role of social enterprises
 - Mainstream repair and second-hand textiles
 - Integrate social enterprises in new circular business models
 - Ensure Extended Producer Responsibility (EPR) implements waste hierarchy and integrates social enterprises
 - Develop skills in post-consumer textiles management
 - Develop new technologies for re-use of textiles

2. CIRCULAR ECONOMY IN THE EU TEXTILE SECTOR
 - Implement waste hierarchy
 - Develop re-use and preparing for re-use targets
 - Make right to repair textiles as inclusive as possible
 - Promote usage of natural, durable, unblended fabrics
 - Give information on expected lifetime
 - Make recyclability compatible with reusability
 - Make re-using and repairing more accessible (financially and technically)
 - Develop separate collection that prioritises and facilitates re-use

3. GLOBAL COMPLIANCE, DUE DILIGENCE AND TRANSPARENCY
 - Promote consistent definition of end-of-waste that facilitates re-use
 - Make sanctions for non-compliance more coercive
 - Control and measure (rather than limit) export of post-consumer textiles

If you wish to upload a supporting file, please do so here:

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

a10b5979-8c3f-4118-89e2-65d1c58b4503/RREUSE_Position_paper_on_EUSST_Final_compressed.pdf

Contact

ENV-GROW-TEXTILES@ec.europa.eu