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TRA Position Paper – EPR on clothing and textiles (Executive Summary).

The Environmental Impacts of the Clothing Supply Chain.

WRAP estimate that about 1.7 million tonnes of used textiles are consumed annually in the UK (excluding mattress and carpets) of which about:

- 1.13 million tonnes are used clothing;
- 315,000 tonnes are shoes and bags;

Around 620,000 tonnes of used clothing were collected for re-use/recycling in 2018.

The fashion industry has an estimated global turnover of €150 trillion a year and employs around 60 million people.¹ However, the current business model is making a huge contribution to the unsustainable over-consumption of natural resources at a planetary level and many textile workers are subject to unacceptable/illegal working conditions and labour abuses.

It is estimated that the industry has the 4th biggest environmental impact across all business sectors (in terms of carbon, water and waste) in the UK behind housing, transport and food.²

Climate Change

It is estimated that across the full lifecycle of clothing globally, the industry is responsible for about 10% of all global carbon emissions.³

If fashion continues on its current path, it could use more than 26% of the global carbon budget associated with a 2°C pathway by 2050.⁴

About 80% of the total climate impact of clothing consumption is linked to its production, this would suggest that there are significant opportunities to reduce greenhouse gas impacts, by improving production techniques, by reducing consumption of new garments, promoting clothing and textile re-use and manufacturing new garments and other products using recycled fibres. Clothing rental schemes, design for durability and design for recycling principles also play a significant role in reducing the climate change impacts of the fashion industry.

Water pollution and consumption.

The industry is also responsible for about 20% of the world's water pollution. One kilogram of cotton - can take as much as 10,000 -20,000 litres of water to produce⁵.

Over irrigation of cotton plantations in central Asia has resulted in the almost complete disappearance of the Aral Sea, which was the fourth biggest inland body of water in the world.⁶

¹ Global Fashion Agenda – A call to action for a circular fashion system 2017

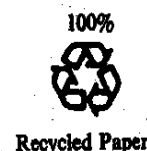
² Valuing our Clothes – the cost of UK Fashion, WRAP, 2017.

³ A New Textiles Economy – Redesigning Fashion's Future – Ellen MacArthur Foundation 2017.

⁴ A New Textiles Economy – Redesigning Fashion's Future – Ellen MacArthur Foundation 2017.

⁵ Fixing Fashion – Environmental Audit Committee 2019

⁶ https://en.wikipedia.org/wiki/Aral_Sea



In addition, water pollution caused by the textile dyeing process is a serious cause for concern. Toxins, carcinogens and mutagens can be released into rivers with dangerous consequences to human health and the environment⁷.

Current Consumption Trends and Markets

We need to prepare for a future that is less reliant on current re-use markets and encourage the development of new markets for used clothing/textiles and recycled fibres.

Global textile production is predicted to rise by 63% by 2030 as the global population is predicted to rise to 8.5 billion¹⁸

Current export market for used clothing are under sustained pressure particularly as competition for exports from other countries such as China are set to expand massively.

The future of the African markets remains very uncertain and it seems unlikely that the continent will be able to accept the ever-increasing amount of used clothing that will arise as consumption of new clothing continues to increase globally.

Extended Producer Responsibility for clothing and textiles – a proposed framework.

The UK Government, in its publication *Our Waste, Our Resources, A Strategy for England 2018*, has committed to invoking the “polluter pay” principle and harness the potential of EPR. It has identified five priority material streams for consideration under this commitment **including textiles**.⁹

As part of this the Government has stated that “by the end of 2025 we will have reviewed and consulted on measures such as Extended Producer Responsibility and product standards for five new waste streams, two of which we plan to complete by 2022.”¹⁰

Based on the known damage to human health and the environment that is caused by the global fashion industry, and the known market failures highlighted in this paper, the Textile Recycling Association assert that the need to ensure that textiles is reviewed and consulted upon by 2022, is unquestionable and absolutely necessary.

After the review has taken place, should a decision be made to instigate an EPR scheme, we propose that a robust framework should be applied that addresses key principles, thus ensuring that a comprehensive and world leading system is implemented. This includes:

- 1) **Setting clear aims and objectives. Including targets to reduce consumption and increase re-use.** This includes deciding which items are actually “in scope” and covered by the EPR scheme – e.g. should it include clothing, other textile products, footwear, bags, accessories, etc?
- 2) **Ensuring businesses that are responsible for putting clothing and other “in-scope” products onto the market should bear the full cost of managing the impact of their product on human health and the environment.** This includes invoking the “Polluter Pays Principle”.

⁷ <https://www.bbc.co.uk/programmes/b0bn6034>

⁸ Global Fashion Agenda – A call to action for a circular fashion system 2017

⁹ *Our Waste, Our Resources, A Strategy for England*, DEFRA, 2018.

¹⁰ *Our Waste, Our Resources, A Strategy for England*, DEFRA, 2018.

- 3) **Delivering better, more sustainable textile products that consume less resources and are easier to recycle.** This can include financial incentives to put more sustainable products on the market.
- 4) **Engaging the consumer in the EPR scheme.** This can include requiring retailers to state how much levy has been placed on each “in-scope” product at the point of sale and funding of an ongoing communication campaign to help consumers make more sustainable choices.
- 5) **Ensuring that all businesses that are responsible putting “in-scope” clothing and other products onto the market contribute.**
- 6) **Requiring all collection, sorting and recycling businesses to be audited in order to qualify as approved recipients of fees.** Such requirements are vital so as to instil confidence amongst clothing producers and other supply chain stakeholders that payments are only going to legitimate re-use and recycling stakeholders and that the costs being charged by end of life partners are fair and proportionate.
- 7) **Implementing robust administration of an EPR scheme for clothing and textiles.** To have a single body responsible for administering an EPR scheme for clothing and textiles would seem eminently sensible and the best way to ensure consistency in the way EPR is applied.
- 8) **Complementing other policy measures and business models.** A future EPR scheme should seek to complement other policy measures/initiatives that seek to deliver improvements in the clothing and textile supply chain.

This could include the implementation of eco-design principles for clothing or alternative business models such as clothing rental services.

It is also important to recognise that a UK circular economy can only be delivered through comprehensive re-use and recycling systems. If textiles are not reused/recycled then any improvements made in other parts of the supply chain, will only result in the delivery of a more sustainable linear economy and not a circular economy. As the only recognised body that represents the UK textile re-use and recycling industry, the **Textile Recycling Association** fully intends to play a major role in shaping the future of discussions and implementation of an Extended Producer Responsibility scheme for clothing and textiles in the UK.

Key Recommendations

This position paper sets out just some of the known impacts that the clothing and fashion industry causes to human health and the environment. The Textile Recycling Association asserts that the need to ensure that textiles is reviewed and consulted upon by 2022 and not to delay the process until 2025, is unquestionable and absolutely necessary. The need to address the industry’s impact on climate change, water pollution, water scarcity, human health and its contribution to the issue of micro-plastics is of paramount importance. Once this review has taken place, only then will the UK be in the best position to make a decision on whether Extended Producer Responsibility on clothing and textiles is a suitable proposal for the UK.

Should it be decided that EPR is a suitable business model for the UK, this paper sets out what the Textile Recycling Association propose should be included in a framework to help deliver a strong and robust scheme. We believe that including the key principles that we have proposed this would help to deliver improvements throughout the clothing supply chain and a truly circular economy that other countries and other material streams may seek to follow.

The Textile Recycling Association fully intends to play a major role in shaping the discussions that will be necessary going forward.
