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# Textile Recycling Association Position Paper – Extended Producer Responsibility on clothing and textiles.

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## Introduction – The Environmental Impacts of the Clothing Supply Chain.

### *In the UK.*

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;
- 295,000 tonnes are household textiles such as bed and table linen;
- 30,000 tonnes are leisure textiles such as sleeping bags,

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

Additionally, WRAP have assessed that about 921, 000 tonnes of used textiles ended up being sent for disposal in the UK in 2017 of which 336,000 tonnes is used clothing.

### *Globally*

The fashion & apparel industry is one of the biggest and economically successful industries in the world. It has an estimated global turnover of €150 trillion a year and employs around 60 million people throughout its entire supply chain<sup>1</sup>. However, the industry's 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.

According to WRAP the industry has the 4<sup>th</sup> biggest environmental impact (in terms of carbon, water and waste) in the UK behind housing, transport and food.<sup>2</sup>

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<sup>1</sup> Global Fashion Agenda – A call to action for a circular fashion system 2017

<sup>2</sup> Valuing our Clothes – the cost of UK Fashion, WRAP, 2017.

## *Climate Change*

Textile production is a major contributor to climate change. It produces an estimated 1.2 billion tonnes of CO<sub>2</sub> equivalent (CO<sub>2</sub>e) per year - more than international flights and maritime shipping combined. It is estimated that across the full lifecycle of clothing globally, the industry has an annual carbon footprint of 3.3 billion tonnes CO<sub>2</sub>e<sup>3</sup> equivalent to about 10% of all global carbon emissions.<sup>4</sup>

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.<sup>5</sup>

However, with about 80% of the total climate impact of clothing consumption is linked to its production<sup>6</sup>, this would suggest that there are significant opportunities to reduce greenhouse gas impacts, not only by improving production techniques, but also by reducing consumption of new garments by refusing to buy, promoting clothing and textile re-use and manufacturing new garments and other products using recycled fibres. Other initiatives such as clothing rental schemes, refashioning, design for durability and design for recycling principles can 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 - equivalent to the weight of a shirt and pair of jeans - can take as much as 10,000–20,000 litres of water to produce<sup>7</sup>.

Over irrigation of cotton plantations in central Asia is responsible for one of the world's biggest environmental disasters. The Aral Sea in Uzbekistan was the 4<sup>th</sup> largest inland body of water in the world at the beginning of the 20<sup>th</sup> Century. It has now all but disappeared and once where there was water there is now only desert.<sup>8</sup>

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 environment. This was highlighted in the BBC Documentary – Fashion's Dirty Secrets<sup>9</sup>. It has also been said that in China one can tell what the colour of the season is by looking at the colour of the dyes that have been released into the rivers.<sup>10</sup>

## *Trends in consumption.*

Global textile production is predicted to rise by 63% by 2030 as the global population is predicted to rise to 8.5 billion<sup>11</sup>

Whereas spending on clothing has risen approximately 4 times in the UK between 1998 and 2018 (from about £15 billion to £60 billion).<sup>12</sup>

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<sup>3</sup> Fixing Fashion – Environmental Audit Committee 2019

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

<sup>5</sup> A New Textiles Economy – Redesigning Fashion's Future – Ellen MacArthur Foundation 2017.

<sup>6</sup> Investor in Brief: Sustainability in Fashion – Mistra Dialogue - 2020

<sup>7</sup> Fixing Fashion – Environmental Audit Committee 2019

<sup>8</sup> [https://en.wikipedia.org/wiki/Aral\\_Sea](https://en.wikipedia.org/wiki/Aral_Sea)

<sup>9</sup> <https://www.bbc.co.uk/programmes/b0bn6034>

<sup>10</sup> <https://www.ecowatch.com/fast-fashion-riverblue-2318389169.html>

<sup>11</sup> Global Fashion Agenda – A call to action for a circular fashion system 2017

<sup>12</sup> Textiles Situation Market Report 2019 - WRAP

Despite nods to the “circular economy” the industry remains committed to continued growth in product sales. With the advance of “fast fashion” and rental platforms and algorithms replacing traditional retail buyers, the impacts are accruing faster than improvements.<sup>13</sup>

## Current markets for used clothing and textiles.

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.

Reducing consumption of new clothing, keeping garments in active use for longer, promoting re-use markets and recycling are all really effective ways of addressing the impacts of fashion industry.

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. In 2010, China only accounted for 0.88% of all exports of used clothing by value globally, by 2015 the country’s share had expanded to 6.4%. By 2017, China was the fourth largest exporter of used clothing in the world.<sup>14</sup>

Furthermore, political moves such as used clothing import bans, as was proposed by member states of the East African Community in 2016, may reduce the overall size of the markets. Despite not going ahead with this initial proposal, the Kenyan Government imposed a temporary ban on the import of used clothing in 2020, citing a particular concern about the possible spread of Covid 19 through the used clothing industry. Kenya has only recently allowed the imports of used clothing to resume under new protocols and in many ways the country acts as a litmus test for many other countries.

A report in February 2020 by ITN highlighted how the used clothing market in Ghana is already struggling to cope with the amount of used clothing being sent to the country with increasing amounts of low quality fast fashion being sent directly to landfill in the country because the items have no markets.<sup>15</sup>

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.

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<sup>13</sup> Measurement without a Clear Incentive to Improve: N Lollo & D O’Rourke, UC Berkeley 2020.

<sup>14</sup> Observatory of Economic Complexity.

<sup>15</sup> <https://www.itv.com/news/2020-02-18/calls-for-tougher-regulation-of-second-hand-cloths>

## Extended Producer Responsibility – What is it?

Extended Producer Responsibility (EPR) is a strategy to add all of the environmental costs associated with a product throughout the product life cycle to the market price of that product.

It is just one tool that can be used to implement resource efficient business models.

“Extended Producer Responsibility’ (EPR) is a powerful environmental policy approach through which a producer’s responsibility for a product is extended to the post-use stage. This incentivises producers to design their products to make it easier for them to be reused, dismantled and/or recycled at end of life.”<sup>16</sup>

In addition, 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**.<sup>17</sup>

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.”<sup>18</sup>

Additionally, the EU is promoting EPR as a way of stimulating innovation. It wants to make “sustainable products the norm in Europe” and is publishing a specific and detailed Circular Economy Strategy for Textiles in 2021.<sup>19</sup> In implementing an EPR scheme for clothing and textiles in the UK, we should be mindful of how similar schemes are being implemented in EU countries and elsewhere including what products are in-scope, thereby giving British businesses the best chance of competing in these markets.

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.

## Proposed Framework for EPR Scheme

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.**

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<sup>16</sup> Our Waste, Our Resources, A Strategy for England, DEFRA, 2018.

<sup>17</sup> Our Waste, Our Resources, A Strategy for England, DEFRA, 2018.

<sup>18</sup> Our Waste, Our Resources, A Strategy for England, DEFRA, 2018.

<sup>19</sup> Circular Economy Action Plan, European Union, 2020.

The EPR scheme should clearly identify desired realistic goals, set tangible targets and identify which stakeholders are responsible. This includes what products actually fall within the scope of the EPR scheme (e.g. should it include clothing, other textile products, footwear, bags, accessories etc?)

Barriers to delivering the aims and objectives should also be identified from the outset with possible measures to overcome them assessed for their practicalities and likely costs. This is important as it will help to inform what realistic goals are and the overall costs of the scheme.

Progress towards targets must be regularly assessed and new goals and measures should be introduced when appropriate.

### **Reducing consumption and increase reuse**

Prolonging the life of garments and increasing re-use provides the greatest benefit at the lowest cost.<sup>20</sup> This is possible by reducing consumption of new garments (and thus production) in the first instance and by implementing business models that promote the collection, sorting and selling (reuse) of good quality clothing. In addition, prolonging the life (number of uses) of garments including increased durability, renting/leasing, refashioning/rejuvenating of second hand/pre-owned items, mending/repairing services and redesign, will address significant environment impacts.

Furthermore, any item that cannot be re-used, repaired should otherwise be sent onto the most appropriate sustainable recycling outlets.

Additionally, in line with the waste hierarchy and legal Duty of Care, reducing consumption and increasing re-use and recycling will need to form an important part of the foundation of a successful EPR scheme.

### **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 not only the cost of collecting and processing the items for re-use and recycling, but also by invoking the polluter pays principle, fees should also cover the costs of ensuring that pollution at the production end or consumer use phase is eliminated as much as is practically possible. This could include investments in dye houses to ensure that no toxins, carcinogens and mutagens are released during the dying process, investment in new processes to minimise water consumption during production, investment in manufacturing facilities that are powered by proven renewable energy supplies and new technologies to mitigate the release of micro-plastics into rivers, lakes and the oceans.

It could also include social costs by ensuring that garment producers are paid a fair wage and are provided decent working conditions.

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<sup>20</sup> Investor in Brief: Sustainability in Fashion – Mistra Dialogue - 2020

### 3) Delivering better, more sustainable textile products that consume less resources and are easier to recycle.

80% of the climate impact of the full life cycle is realised during the production phase of garments.<sup>21</sup>

As well as reducing consumption and promoting re-use, delivering better more sustainable clothing and textile products that use less resources and which are easier to recycle will place a crucial part in reducing carbon and greenhouse gas emissions.

Clothing and textile products that contain either a minimum recycled content or are manufactured using less resource intense product like organic cotton, could be subject to a reduced fee. Similarly, products that have been designed for recycling or disassembly could be subject to favourable rates. At the same time in-scope products that are unnecessarily accessorised (e.g. tassels, sequins, electronics) or that contain multiple number of materials (some trainer shoes may contain around 50 different constituent products sometimes from virgin sources that are not responsible in their origin, making it impossible to recycle them economically) could be subject to enhanced fee.

### 4) Engaging the consumer in the EPR scheme.

Depending on the overall fee set for each product, this might include stating to the customer how much has been levied on the product that they have purchased. Signposting should also be given instore, online, via the media and other outlets to a communications campaign funded through the EPR scheme which provides information to the consumer about how they can look after their products, extend the life of the products and provide information about how and where to take their items when they no longer want it. The communication campaign could also inform consumers as to how they can reduce their environmental burden through their choices of purchases.

**In addition, teaching materials could for schools, colleges and universities could be funded and delivered through the EPR scheme.** This could be in the form of educational materials to help to deliver lessons, lectures or more practical examples with a view to garnering more sustainable consumers and product designers in the future.

### 5) Ensuring that all businesses that are responsible putting “in-scope” clothing and other products onto the market contribute.

Whilst we advocate that implementation of any future EPR scheme must be done in full consultation with stakeholders from across the UK clothing and textile supply chain and that in developing any agreement on how the scheme will be implemented needs to be led by industry, once these have been undertaken, the resulting agreed EPR scheme will have to be backed up by law. All businesses that put clothing and textiles on the market must be required to participate.

In France, which has been running an EPR scheme on clothing and textiles for a number of years, businesses have the option in law of either paying the relevant levy for each item they put on the market or they could, if they so wish, instigate their own supply chain take back

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<sup>21</sup> Investor in Brief: Sustainability in Fashion – Mistra Dialogue - 2020

schemes, instigate their own sorting processes of items taken back and then prepare them for onward sale. Around 98% of relevant businesses are legally complying with the EPR scheme and all have chosen to take the option of paying the levy.

Whilst we believe that the majority of producers would opt to go for a levy in the UK as well, we propose that producers should be given the option to comply with their obligation in a similar manner to those that are allowed under the French scheme.

#### 6) Requiring all collection, sorting and recycling businesses to be audited in order to qualify as approved recipients of fees.

Any business involved in the reuse/recycling of clothing and textiles will only be eligible receive payments subject to regular audits from a suitably qualified body. The audit will address issues such as compliance with Duty of Care, the Waste Framework Directive, other relevant environmental legislation, compliance with employment law, health and safety etc. and transparency of markets. Businesses will also be required to demonstrate that they meet specific levels of efficiency (e.g. they must be able to demonstrate that they are sending an agreed minimum percentage of what they collect for re-use/recycling before they qualify for payment).

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.

The way in which an EPR scheme should be administered in the UK should be considered in the consultation. In France “Eco Tlc” is the only organisation accredited by French public authorities to administer the scheme and this is backed in law.<sup>22</sup>

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. However, safeguards would need to be put in place to ensure that such a body itself is working to professional, transparent and efficient standards (thus representing value for money), and that the body itself is prohibited in law from trading in any part of the supply chain.

This is our initial preferred position regarding the administration of any future EPR scheme, but this could be subject to change during the consultation should other parties present a compelling case.

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<sup>22</sup> <https://www.ecotlc.fr/page-297-information-in-english.html>



## 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.

In addition, the UK Government has committed to introducing separate collections of textiles by all local authorities by 2025. A future EPR scheme should seek to complement this and promote the resource efficient methods of separate collections.

Alternative policy measures that could be considered is requiring a minimum recycled content in all clothing/textiles going on sale in the UK or policies that could reign in the unsustainable consumption rates of fast fashion. We recognise that this objective relies on a number of technologies that are either not at commercial scale yet or not available in the UK, therefore part of the funds raised through EPR should seek to support R&D and investments in these new technologies in the UK.

If minimum pricing was introduced for a range of key garments, it would prevent fast fashion companies from undercutting each other. At the same time, it may help clothing retailers to retain profits whilst reducing consumption levels. Minimum pricing could also encourage consumers to hold onto their clothing for longer as they know they would have to pay more for their new clothing.

In Sweden plans are being implemented to introduce a new tax on harmful chemicals in clothes and shoes (at a rate of 40 SEK per garment (about £3.25 per garment)<sup>23</sup>. The aim of the tax is to drive the substitution of harmful chemicals and thus to have an impact on the production of textiles.

Some potential further outcomes that we might want to achieve through the introduction of EPR on clothing and textiles is contained within [Annex 1](#).

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 early 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,

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<sup>23</sup> Investor Brief: Sustainability in Textiles and Fashion, Mistra Dialogue 2020

human health and its contribution to the issue of micro-plastics is of paramount importance. It is important this review takes place as soon as is practical after the publication of the EU Circular Economy Action Plan on Textiles 2021, so that British businesses do not miss out.

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.

## Annex 1

### Desirable outcomes

This annex some ideas/thoughts about what a successful EPR scheme might seek to achieve. It is not an exhaustive but should be seen more as a starting point for what stakeholders may want to see as desirable outcomes.

#### For everyone:

- 1 Consumption of new clothing and textile products to be reduced, whilst maintaining an environmentally, socially and economically sustainable and robust supply chain.

#### For designers and manufacturers:

- 2 All clothing/textiles to be manufactured using recycled or sustainable fibres.
- 3 All clothing/textiles to be manufactured in a socially responsible manner with minimal impacts or even positive benefits to the environment.
- 4 Product design to give consideration to re-use and recyclability at the end of the products first life and subsequent uses.
- 5 Products designed for performance and appropriate lifespan.

#### During the “Consumer use” phase;

- 6 Products requiring less washing
- 7 Products that damage the environment less during consumer use phase (e.g. environmentally friendly washing powders) could receive a credit from the EPR. Better washing machines/tumble dryers could be cheaper. Tax breaks for clothes dryers and washing lines.

#### To encourage Re-use and recycling;

- 8 Financial assistance for collectors to encourage efficient/financially viable collections.
- 9 Only collectors and sorters that can demonstrate suitable business credentials to qualify for financial assistance. Eg. To qualify for a “sorting” credit they would need to demonstrate that they uphold specified sorting standards (e.g. minimum number of grades sorted, no waste in re-use grades and no re-useable/recyclable grades being sent for disposal, traceability along their supply chain – can they demonstrate where all the clothing they collect ends up?). Also are the businesses complying with their legal Duty of Care, Waste Framework Directive, Employment and Health and Safety Laws. Also are they paying minimum wage to their staff.
- 10 Consideration could be given to businesses/enterprises that provide job opportunities for long term unemployed etc.
- 11 Creation of new markets for re-used and recycled products. Including Research and Development funding to establish new chemical and fibre recycling technologies and markets and funding into new business structures to improve efficiencies in the logistics of collecting and sorting used textiles for delivery to recycling processors.

### To facilitate Publicity and Communications;

- 12 Publicity campaign and other communication resources could be funded through the levy
- 13 Provide unbiased information about the trade which journalist can refer to.
- 14 Provide messaging for retailers and brands to help promote the circular economy,
- 15 Provide educational information and training material to schools, colleges and universities about sustainable fashion initiatives.
- 16 Textile Recycling Association to become instrumental to assist establish a centre of excellence for the UK textiles supply chain .

### Promote circular thinking by encouraging innovation throughout the supply chain

- 17 EPR scheme for clothing/textiles should not solely focus of those items which have been sent for re-use and/or recycling. Focus should be given to all parts of the supply chain and steps put in place to ensure circularity. To get away from the mind-set that a new product is first produced and eventually has an end, perhaps our circular economy model for clothing/textiles should have the consumer use phase or re-use/recycling phase placed at the top of the circular model.
- 18 Clothing and textiles that have been sent for re-use/recycling should be viewed as a resource with embedded materials and energy that need to be kept in circulation for as long as possible and in as big quantities as possible.
- 19 If there are elements within a clothing/textile item which cannot be recycled once a product is worn out, then measures should be taken to restrict use of, redesign or remove that element

### Reward retailers and manufacturers that put more sustainable products on the market.

- 20 Products made from more sustainable fibres could have a reduced levy
- 21 Retailers/manufacturers that collect used clothing/textiles – consideration should be given as to whether they can claim payment from the levy for clothing collected and they should be rewarded for products that they sell manufactured using their recycled content (i.e. where they have closed the loop).

### What should be included

- 22 What should the EPR apply to? E.g. clothing, household textiles (curtains, bed linen, bags etc), shoes, belts.
  - 22..1 Should it apply to mattresses, carpets, duvets, pillows, leather products (other than shoes)?
  - 22..2 Need to draw up list of products included under the EPR
  - 22..3 Should consider main exclusions as well.

## Other considerations

- 23 This EPR would be as much about preventing items becoming waste in the first place as it would be about being able to recycle waste back into useful products, therefore we should avoid any requirement for the products to be classed as waste in the first place. The EPR should apply to products decided as per paragraph 18, irrespective of whether they waste or not.
- 24 Current EPRs operating in the UK focus on items that are waste. However, many of the used clothing items collected do not become waste at the point of collection (in England, Wales and Northern Ireland) because the items are re-used. It should be pointed out though that if these collection systems were not in place the vast majority of these items would become waste. In addition:
- 25 This EPR would be as much about preventing items becoming waste in the first place as it would be about being able to recycle waste back into useful products, therefore we should avoid any requirement for the products to be classed as waste in the first place. The EPR should apply to products decided as per paragraph 15, irrespective of whether they waste or not.
-