

Response to Consultation on “Roadmap for EU strategy for sustainable textiles”

With reference to the European Commission’s roadmap proposal and consultation documents which can be accessed [here](#).

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Contact:

The Stockholm Environment Institute (SEI) is an international non-profit research and policy organization that tackles environment and development challenges. Headquartered in Sweden, the institute has centres in Estonia, Thailand, Kenya, UK, US, and Colombia. We connect science and decision-making to develop solutions for a sustainable future for all. Stakeholder involvement is at the heart of our efforts to build capacity, strengthen institutions and equip partners for long-term change. Our knowledge and findings are accessible: as our own open access material, in leading academic journals, and repackaged for effective decision support.

A background to the contributors to this response, and a disclosure of their interests can be found in Annex A.

Key recommendations:

1. Each EU member state should develop a strategic approach and regulatory framework. There is a need to set national targets (based on EU targets set by relevant directives) for increased collection, reuse and recycling of textiles and policy measures that provide incentives for all relevant actors (collectors, sorters, recyclers and re-sellers of post-consumer textiles) in the value chain meet these targets.
2. Member States should ensure the economic viability of textiles collection, reuse, and recycling (e.g., by Extended Producer Responsibility scheme, waste fees and taxes).
3. Strengthen regional sorting capacity and recycling by supporting R&D and investments into relevant technologies.
4. Provide EU and national level support to new business models and the development of international business clusters in the form of grants, financial support, business counselling and coaching.
5. Adapt policies and strategies that support green/circular public procurement for increased circularity.

Strategy and regulatory framework

In order to develop a successful circular textile system, there is a need for a systematic approach. EU member states should set targets for increased collection, reuse and recycling

of used post-consumer textiles. These targets should be adopted by national governments and supported by relevant policy measures that would provide legal and economic incentives for all relevant actors (collectors, sorters, recyclers and re-sellers of post-consumer textiles) across the value chain to meet these targets. It is recommended to focus on the following areas, actions and supportive policy measures:

Provide economic support to boost the competitiveness, sustainability and resilience through cooperation of the textile sector and strengthen sorting capacity and recycling within Europe

The operational costs of the circular textile system can be high, especially for collection of used textiles and for the recycling of non-reusable textiles. The economic viability of operations will come under further pressure towards 2025 when non-reusable textiles will increase their share in collected textiles. Therefore, a critical element of a circular textile system is ensuring that organisations acting at all stages along the value chain (this includes collection, reuse and recycling) can operate under economically viable conditions. We recommend ensuring economic viability of collection and processing of textile waste with sustainable investments during transition phases. Extended Producer Responsibility scheme, waste fees and taxes could be considered as possible measures to ensure the financial viability of the collection and recycling of used textiles.

Business models that promote longer use of products (e.g. lease, rent, re-commerce, repair, resell, reuse), product take-back and material circularity (e.g. upcycling) play a vital role in accelerating the circular economy transition. These new business models generate money and jobs, as well as promote circular consumption practices. New circular business models are often start-ups which would benefit from EU and national level financial and business support by funding bodies in the form of grants, business counselling and coaching.

We recommend the development of collaborative EU-wide and regional business clusters across the value chain to strengthening the capacity in circular transition (e.g. Telaketju¹ project). These clusters could increase the productivity of the involved companies, drive innovation and knowledge in the field, and stimulate new businesses through collaboration. The development of business clusters could be backed by providing financial support. For example, the business clusters could apply for EU funds applications and investment loans.

Along with reusable textiles, collection activities produce large quantities of non-reusable textile waste. A significant share of this was sent for recycling to third countries. Disrupted secondhand markets (e.g. third countries banning the import of used textiles) have highlighted the need to reuse and recycle more clothes and textiles within Europe. We recommend supporting the R&D of sorting and recycling technologies and their establishment in Europe. Local recycling of textiles would provide the possibility for manufacturers to source recycled materials locally. As a result, this would boost local circular textile ecosystem and help with local job creation across the value chain. In addition to individual company grants,

¹ <https://telaketju.turkuamk.fi/en/front-page/>

funding opportunities should be provided for multi-stakeholder initiatives and research programs.

Creating market for sustainable textiles by Circular/Green Public Procurement

Circular/Green public procurement can provide a powerful mechanism to encourage the development of circular production and circular products. We recommend EU Member States develop circular procurement strategies, which can include specific targets on procurement practices and eco-design and minimum circular criteria in public procurement guidelines and rules. This could for example be through setting purchase criteria that favored eco-designed workwear and other textiles e.g. durable, repairable and recyclable products and products with recycled content. While promoting circular procurement, it is important to provide education and knowledge for those responsible for procurement. Therefore, consideration must be given to knowledge transfer and sharing of existing good practice examples regarding implementation of green/circular procurement.

The proposed recommendations are composed based on report “Post-consumer textile circularity in the Baltic countries: current status and recommendations for the future” Watson D., Kant Hvass K., Moora H., Martin K., Nausédé V., Gorauskiene I., Akule D.²

Annex A. Background and disclosure of interests

This response includes contributions from:

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As part of our work, over the past several years, SEI Tallinn has actively engaged with projects and activities related to circular textile systems including

- [Towards circular Nordic-Baltic textile system](#) with support from the Nordic Council of Ministers

² <https://pub.norden.org/temanord2020-526/>