

CISUTAC Vision for a Circular and Sustainable EU Textile Sector: A European EPR that drives circularity

The CISUTAC project aims to **increase circularity and sustainability** in textiles and clothing in Europe. Its main goal is to **remove current bottlenecks** in textile management to **increase circular use of textiles**, and to minimise the total environmental impact of the sector.

Within CISUTAC, partners are developing a shared vision for a more circular and sustainable EU textile sector based on an assessment of EU developments enabling circularity, and national measures to implement the mandatory separate collection of discarded textiles. The vision explores different elements of circularity and advises on strategic directions to identify relevant innovation gaps and possible solutions emerging from CISUTAC.

Extended Producer Responsibility (EPR) aims to ensure that producers contribute to the costs of waste management and bear financial responsibility or financial and organizational responsibility for the end-of-life phase of their products. EPR has been identified as a **key element of CISUTAC vision**. If properly implemented, EPR could reduce the environmental impact of textiles, promote circular business models such as reuse and recycling, and contribute to more efficient end-of-life management. CISUTAC vision on EPR proposes a set of guiding principles for an EU-wide textiles EPR that supports the shift to circular economy.



Establish EPR schemes tailored to widespread circularity

EPR is one of the key policies that ought to support the implementation of the obligation for EU Member States to separately collect discarded textiles as of January 2025. The recent proposal by the European Commission for a targeted revision of the Waste Framework Directive (WFD) introduces mandatory EPR schemes for textiles, with minimum requirements for harmonisation, which is essential to realise the environmental benefits that EPR seeks to achieve. Implementation of national schemes with diverging coverage or objectives risks serious inefficiencies in delivering a well-functioning system for textile reuse and recycling in Europe. A common framework for EPR will also avoid variations in compliance requirements resulting in increased burdens and costs for companies, especially SMEs.

A harmonised EPR scheme should look beyond waste management costs to effectively implement textile circularity by linking eco-design criteria to waste management policy, boosting research and innovation, and awareness raising.

To unlock EPR's potential to deliver positive impacts, we need to identify the remaining barriers to textile circularity, the costs of an industrial circular transition and the necessary structural changes. It should be recognised that specificities among national waste management systems exist, and flexibility should be maintained to accommodate country-specific operational solutions (e.g., logistics). EPR cannot alone address all the sustainability challenges currently facing the textiles value chain. The EU Textile Strategy foresees a wider policy framework addressing sustainability, including, for instance, the Eco-design for Sustainable Products Regulation (ESPR). A regulatory alignment, including implementation, is imperative to enable a successful transformation of the sector in the coming years.



Respect the waste hierarchy

EPR schemes shall be designed with respect to the waste hierarchy. It shall aim to contribute to the textile circular economy by enabling waste prevention, efficient collection, sorting, preparation for reuse, reuse, preparation for recycling and recycling. One of the measures that should be introduced to ensure that EPR schemes will respect the waste hierarchy is the implementation of separate targets for preparation for re-use and for recycling. The targets should be based on reliable data to support implementation.

The sorting and pre-processing of discarded textiles from end-users and factories are complex, time-consuming, and labour-intensive processes. They should be optimised and improved through partnerships, logistic improvements, financial incentives and support for research and innovation that will advance and scale up digitalisation and automation.

Measures should be introduced to scale up local reuse and repair sectors together with key actors, such as social economy actors and local authorities. This could be done through the introduction of repair and re-use funds. Revenues generated by the EPR fees should contribute to the green transition by investing in circular business models. Currently, very limited volumes of textile waste are being recycled. With the mandatory separate collection of textile waste, around 2.2 million tons of waste will be available for recycling in 2030¹, making it necessary to further develop recycling technologies, and build up a recycling value chain that can deliver. The fibre-to-fibre recycling technologies must further expand their ability to handle fibre blends, lower their costs, and improve their output quality. Many innovative recycling technologies have started moving from pilot stage to becoming ready for commercial scaling. As these technologies get more advanced, they will most likely begin to perform better both from an ecological as well as cost-competitiveness point of view. EPR funds should support the transition into this direction. Indeed, it is important to help SMEs, which lack necessary capacities and resources, in pursuing innovation and technological development.

¹ Estimates based on McKinsey White Paper "Scaling textile recycling in Europe—turning waste into value", July 2022.



Incentivise eco-design for sustainable products

A common structure for EPR fees is needed and should include eco-modulation criteria. To contribute to textile circular economy and tackle fast fashion, in the sense of irresponsibly produced excessive volumes of unsustainable and low-quality garments at low price levels, eco-modulation of fees should be aligned with sustainability criteria identified in the upcoming ESPR and their amount should be decided by Member States. Modulated fees must be replicated consistently by all Member States, towards greater impact that will create real incentives for producers to adopt circular design.

Further research is needed on how EPR and eco-modulation can work best in practice, including what the optimal levels of EPR fees to provide sufficient incentives for companies to improve the quality and durability of products are, and how to best support the waste hierarchy by increasing local re-use and repair, and ease of recycling.



Respect the heterogeneity of textiles

Textile products offer a wide variety of applications, materials, technical features and requirements, business models (rental use, second-hand etc.), current and future potential for circularity. For many textile products, no sufficient information is available to quantify EPR's impact, costs and benefits. More information on the progress of technology, investment plans, research and innovation projects should be acquired to assess the end-of-life options that exist for different types of textiles. Some textile products may be better placed in different EPR regimes, for example where they have distinctive properties for end-of-life management.

Textiles produced or designed in controlled value chains present higher chances to be reused or recycled, while complex textile products such as personal protective equipment (PPE) must follow tight requirements, for special chemical coatings etc., and offer little or no opportunity for recycling or simple design with the currently available technologies.



Develop shared responsibility and foster partnerships

A successful transition to a circular economy requires strong partnerships along the value chain based on mutual understanding and shared responsibilities. Therefore, EPR should set clear rules and obligations for all relevant actors included in the governance (producers, importers, distributors, distance sellers, organizations implementing PROs, private or public waste operators, e.g., recyclers, local authorities, and re-use and preparing for re-use operators as social economy actors).

Effective administration with minimised administrative burdens can be ensured through cooperation, where all waste management actors are fairly represented and

supported for their functions. Equal treatment shall be provided for all EPR stakeholders to participate and benefit from the opportunities offered by the transition to circular economy. This is essential for building cost-effective national EPR schemes that drive business competitiveness.

EPR should support collaborations that will enable the effective exchange of information, foster materials pooling, eliminate contradictory rules, maximise local reuse and link demand and offer of recycled materials. Fostering relations between the different actors, such as producer organisations, social economy operators and local authorities can create and preserve local and green jobs through implementation of waste prevention and waste management policies.



Ensure uniform and effective compliance and enforcement

The system should be effectively enforced, allowing monitoring of implementation and data collection. The inclusion of imported products from third countries in EPR schemes, including via online sales, is critical to ensure a level playing field for responsible EU companies and contribute to the overall objectives of EPR. National market surveillance authorities should be equipped with the necessary capacities and infrastructure to control that there are no free riders. A system of uniform, effective and proportionate penalties for non-compliance should be in place.



Allow enough time for proper implementation and stakeholder consultation

The setting up of a national EPR scheme is a complex process that involves various stakeholders. It therefore needs to be ensured that a feasible timeframe is provided to properly design and implement the scheme, tailored to the needs and specificities of the national waste management system. Effective stakeholder consultations will make it possible to identify the support needed and potential solutions to manage the impacts of EPR obligations and related requirements and ensured continued competitiveness for all stakeholders involved.



Boost more sustainable consumer behaviour

Consumers play a key role in turning circularity into a reality by making well-informed, responsible, and sustainable textile consumption choices and ensuring environmentally sound waste management. EPR shall support consumer behavioural change by financing awareness-raising campaigns for end-users on, among others, sustainable consumption, waste prevention, re-use, preparing for re-use, recycling, other recovery, and disposal of textiles.