

Dear
Executive Vice President Frans Timmermans,
Commissioner Virginijus Sinkevičius,
Commissioner Thierry Breton,

Establishing EU-harmonised rules for Extended Producer Responsibility as a key enabler for championing the transition to a circular and climate-neutral apparel and footwear sector in the EU

We firmly believe the future of the textiles, apparel, and footwear sector is circular, where products are made to last and made from safe, renewable, recycled, and sustainably sourced materials. **To enable and accelerate this shift towards a circular economy, it is essential to preserve the competitiveness of the textile industry by leveling the playing field to support a properly functioning market for recycled textiles both within the EU and at a global level is central for success.** It will both be paramount that products are designed to be sustainable, durable, and recyclable, but it will be equally important that the needed reverse logistics are in place i.e., appropriate infrastructure capacity for collection, sorting, and recycling across the entire EU.

The 2025 separate collection obligation of textile waste laid down in the 2018 Waste Framework Directive, is an important step in that direction. Many Member States are currently developing individual national Extended Producer Responsibility (EPR) schemes to implement the collection obligation (e.g., France, Sweden, the Netherlands). Differing in scope and approach we see such fragmentation of national waste management systems and EPR rules across the EU as a risk and a lost opportunity for establishing an effective and consistent circular textiles, apparel, and footwear sector in the EU.

Based on the requirements in the Waste Framework Directive, we ask for EU-wide harmonised rules on the scope and requirements on EPR for textiles, apparel, and footwear. This should include: a set of common definitions providing the basis for EU eco-modulation; a clear scope and allocation of responsibilities across all relevant stakeholders, a robust mechanism of monitoring, control, and surveillance, and a transparent reporting system.

The opportunity for establishing harmonised definitions, criteria, rules, and requirements for EPR schemes at EU level – and the implications of not establishing harmonised rules

- Harmonised EU rules on eco-modulated fees would enable companies to consistently make more sustainable product design choices, to make products more durable, recyclable, from recycled content with overall lower environmental impacts.
- Harmonised EPR rules and requirements would allow the scaling up of textile, apparel, and footwear waste collection faster and more efficiently: scale is one key enabler for a circular economy. Establishing different national and regional schemes across the EU represents a large risk of developing an inefficient collection, sorting, and recycling system, preventing the scalability industry needs.
- Harmonised EU rules would incentivise setting up more effective flows of ‘post-consumer wastes’ and the ‘capital needed to establish infrastructures’ across the EU. They would also reduce the costs of recirculation of materials and resources.
- Harmonised rules are critical enablers to establish transparent and uniform reporting requirements on waste and resource flows across the EU creating traceability and transparency – prerequisites for a safe circular system. In contrast, differing national rules would lead to a multiplication of costs and reporting requirements.
- Harmonised rules allow faster and efficient implementation of EPR schemes across the EU. Without the lead time needed to define national approaches, national authorities and stakeholders can focus on capacity building and developing the local solutions based on the common EU rules. This would create the right level of flexibility respecting national needs, existing systems, and different Competent Authorities.

We believe EU-wide harmonised EPR rules should be established with the purpose of delivering circular value chains that prolong the life of products through preparing for reuse, or if not suitable for reuse encourage recycling of the materials from apparel and footwear. Therefore, an EU wide EPR rules should finance:

1. The scaling and development of infrastructure for collection, manual, as well as automatic sorting, preparation for reuse, and fibre-to-fibre recycling and ensure these are available across the whole of the EU. Bringing fibre-to-fibre recycling to sufficient scale will be a key enabler realising a circular textile model and may be boosted by the ReHubs Initiative. To effectively roll out the needed reverse logistics, there will be a need for initial investment support to get the system up and running across the EU.
2. The transparency and traceability of material flows: Which is key for establishing the functioning markets for safe, high-quality recycled materials.
3. Awareness raising and consumer education on the value of taking care of and repairing garments and the importance of delivering garments for separate collection at end of use.

Harmonised EU rules and requirements on EPR, collection, sorting, and recycling standards and common definitions for the apparel and footwear industry will support the industry in their journey creating a circular and climate-neutral apparel and footwear ecosystem. We, the undersigned: manufacturers, brands, retailers, collectors, sorters, recyclers, municipalities, cities, civil society; are committed to closely collaborate and do our part to deliver on this urgently needed systemic shift of our sector.

Yours sincerely,

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ABOUT THE POLICY HUB – CIRCULARITY FOR APPAREL & FOOTWEAR

The Policy Hub unites the apparel and footwear industry to speak in one voice and propose policies that accelerate circular practices. Launched in 2019, the Policy Hub has five partner organisations: Sustainable Apparel Coalition (SAC), Global Fashion Agenda (GFA), Federation of the European Sporting Goods Industry (FESI), Textiles Exchange (TE), and Zero Discharge of Hazardous Chemicals (ZDHC). In total, these organisations represent more than 500 apparel & footwear stakeholders including brands, retailers, manufacturers, and NGOs.