

# GUIDING PRINCIPLES ON TEXTILES COLLECTION AND MANAGEMENT

December 2023

## INTRODUCTION

**The revision of the Waste Framework Directive (WFD) and the development of end-of-waste (EoW) criteria for textile waste will have a major impact across the European Union. The waste status has the potential to either boost or endanger social enterprises in textiles collection and management and is therefore a key issue for the RREUSE network.**

The WFD defines waste as “any substance or object which the holder discards or intends or is required to discard”, but different Member States’ interpretations in this area have resulted in a diversity of national contexts in which social enterprises have been operating. The impact that a harmonised waste status would have on those different realities should be carefully assessed and reflected in the ongoing legislative developments.

In some countries (e.g. the Netherlands, Greece, Germany, Austria) donations brought to second-hand stores operated by social enterprises or to re-use centers are not considered waste, therefore small organisations or re-use centers do not need a waste permit. If all organisations including those only working with donations for re-use were required to obtain a waste permit, administrative burden and financial cost could lead to a collapse of that entire segment of the social economy. On the other hand, there are countries where all collected textiles, regardless of the manner of collection, are considered waste and any entity managing such textiles needs a waste permit. In such contexts, a potential exemption for donations could be detrimental. One major issue is that it may lead to mainstream businesses massively entering the second-hand market at the expense of social enterprises that would be left with predominantly lower-quality textiles.

To account for the diversity of national contexts and for the essential role that social enterprises play – by preventing the premature recycling of reusable goods, creating inclusive jobs and generating income from the sale of used textiles that benefit local communities – RREUSE has developed a set of guiding principles for policy making on textiles collection and management.

**We appeal to policy makers at all governance levels to follow these principles in any policy developments related to this crucial area for social enterprises and societies at large. The goal should be to preserve the diversity of national framework conditions without watering down the general social and ecological ambition.**

## GUIDING PRINCIPLES

**1 Local re-use and preparation for re-use must come first.**  
The priority follow-up for collected textiles must always be local re-use. To that end, both the proximity principle and the waste hierarchy have to be front and center of policy making.

**2 Social enterprises’ vital role should be protected.**  
Social enterprises are the only actors in the circular economy for textiles that always put local re-use and preparation for re-use first. It is crucial to preserve this sector and not allow for it to be overrun by purely profit-driven and/or unethical actors.

### **3 Direct deliveries to social enterprises should be preserved.**

The possibility of in-store donations to social enterprises should be preserved as they lead to social enterprises directly receiving higher-quality textiles and therefore to a higher degree of local reuse. These donations should be counted as collected textiles in the EPR schemes.

### **4 Donations must be limited to social enterprises.**

The term “donation” only applies to giving something for free to a social enterprise, charity organization or a state mandated re-use center and must not be used in the case of purely commercial second-hand retailers.

### **5 Waste can be a resource but still must be reduced.**

In the context of the climate crisis and other environmental emergencies it is vital to educate citizens that their consumption patterns have to change: in favour of buying less, of better quality, used, and holding on to the goods for as long as possible.

### **6 Social enterprises need a guaranteed central role in textiles collection.**

To be able to perform their critical role in used textile management, social enterprises must be recognised and involved as key actors in the collection of textiles under the EPR schemes.

### **7 Funding distribution has to be aligned with waste hierarchy.**

The distribution of the EPR fees must follow the waste hierarchy. That means 1) placing waste prevention efforts, re-use and preparation for re-use activities ahead of recycling; and 2) distributing funding accordingly.

### **8 The EPR fees must cover social enterprises’ textile management cost.**

All textile-management costs incurred by social enterprises – for collection, sorting, re-use/repair – and preparation for re-use activities, training as well as residual waste disposal – should be fully covered from the EPR fees.

### **9 Administrative burden must be manageable**

Any new policy measures have to account for the long history and diversity of social enterprises in the re-use and preparation for re-use of textiles, by not introducing excessive administrative burdens.

### **10 Social enterprises should receive support in the transition.**

Any new regime will potentially endanger the already precarious existence of social enterprises in certain contexts, and it is therefore crucial that the sector receives all the necessary support – financial, operational, training, administrative – to successfully adapt.

