RREUSE feedback on EU Strategy for Textiles

Over half of RREUSE’s 27 members work with used textiles, garment, leather and footwear (TGLF), collectively managing 257,000 tonnes across Europe annually\(^1\). Thus, the “EU Strategy for Textiles” is highly anticipated by the EU re-use sector and RREUSE welcomes the release of its roadmap. Undoubtedly, this initiative will also please the 75% of EU citizens who view sustainability as very or extremely important when buying fashion\(^2\).

RREUSE and the 60+ signatories of the “Fair and Sustainable Textiles, European civil society strategy for sustainable TGLF” are happy to see the document mentioned in the roadmap. RREUSE is also grateful for the acknowledgement of the impact that COVID-19 had on the trade of second-hand TGLF.

Nonetheless, RREUSE would like to take this opportunity to raise the following points:

1. **Give priority to prevention and preparing for re-use**

RREUSE feels that the roadmap focuses too much on developing the textiles recycling sector. For instance, the objective of this strategy is said to address “structural weaknesses regarding textile waste collection, sorting and recycling in the Member States”. What about tackling overconsumption\(^3\) or supporting repair and re-use activities?

Buying a used TGLF item instead of a new one reduces its carbon footprint by 82 %\(^4\). Reducing the impact of the TGLF industry simply by making fast fashion recyclable will not suffice. There is a pressing need for ecodesign policies to focus on making TGLF products more durable and repairable, as well as for sustainable investments to finance re-use activities.

Fortunately, the roadmap states that the waste hierarchy will be considered when studying the role of EPR. Whether linked to EPR schemes\(^5\) or not, **concrete targets prioritising re-use over recycling must be developed**, preferably in coordination with employment targets valorising the role of social economy actors.

2. **Protect re-use operators of the social economy**

It is encouraging to see that the “environmental and social impact” of the EU textiles sector will be addressed, especially if this goal is applied to the production of new TGLF as well as the management of used TGLF. **Protecting the role of social economy enterprises in that sector is essential to support the integration of disadvantaged groups on the job market**. This will be a particularly welcome step in the context of the COVID-19 crisis recovery.

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\(^1\) RREUSE, 2019 Impact & Activity Report – Available [here](#)
\(^3\) European Parliament (2021), MEPs call for binding 2030 targets for materials use and consumption footprint – Available [here](#); EEA (2021), Sustainability: What are the alternatives to economic growth? – Available [here](#)
\(^4\) ThredUp (2019), Resale report – Available [here](#)
\(^5\) RREUSE (2020), Extended Producer Responsibility and the role of social economy re-use operators: Implementing a socially inclusive waste hierarchy – Available [here](#)
Collection, sorting and sales of second-hand TGLF can locally create 20 jobs per 1,000 tonnes of used clothes and shoes\textsuperscript{6}. Developing partnerships along the TGLF value chain together with social enterprises would maximise sustainable production and consumption (e.g. reward systems for companies who partner with re-use/upcycling initiatives to use waste fabrics and materials).

An impact assessment should also be carried out regarding separate collection obligations for TGLF under the Waste Framework Directive, taking into account the associated environmental, social and economic impacts on used-textile management operators.

3. Voluntary approaches and new business models are not enough

The strategy described in the roadmap is not solid enough to encourage the EU TGLF sector to move towards a circular economy. Incentivising new business models such as ‘product as a service’, for which the sustainability still needs to be demonstrated\textsuperscript{7}, or promoting the use of voluntary labelling will fall short in making the sale of low-quality products less profitable. The battle against fast fashion will not be won by giving consumers more choice or information.

Ecodesign measures must make textile products more durable and repairable, advertisement should be limited, the destruction or premature recycling of unsold and returned goods should be banned and floor prices for some emblematic items must be developed to internalise the environmental and social externalities caused by the production of TGLF products.

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\textbf{RREUSE} is an international network representing social enterprises active in re-use, repair and recycling. RREUSE members divert around 1 million tonnes of goods and materials on an annual basis from landfill.

In 2018, RREUSE members active in re-use extended the lifespan of 214 500 tonnes of products, counterbalancing the average CO2 emissions of approximately 108 000 EU citizens.

Environmental services, including those of re-use and repair, enabled 850 social enterprises federated by RREUSE’s wider network to fulfil their social mission, which for the most part includes the provision of work opportunities, training and support services for disadvantaged individuals. There are approximately 95,000 employees, volunteers and trainees engaged in the activities of RREUSE members.

\begin{itemize}
\item \textsuperscript{6} RREUSE (2016) Ethical principles for the clothing re-use sector – Available here; RREUSE (2015) Re-use has higher employment potential than recycling – Available here
\item \textsuperscript{7} Circle Economy, European Environmental Bureau, Fair Trade Advocacy Officer – Available here
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