

## ANNEX

### RREUSE Response to consultation on EU Strategy for Sustainable Textiles

#### EXECUTIVE SUMMARY:

RREUSE calls for an inclusive EU Strategy for Sustainable Textiles which promotes the role of social enterprises — *operators in the social economy whose primary objective is to have a social, societal or environmental impact over profit* – and concretely implement the waste hierarchy. Social enterprises active in the collection, management, sorting and resale of post-consumer textiles provide circular and sustainable solutions that should be safeguarded and promoted. Respecting the structure of the Consultation on an EU Strategy for Sustainable Textiles, and to create policies that are truly sustainable and trigger the development of local, green and inclusive jobs in the EU, RREUSE recommends the following:

#### 1. TEXTILES, A KEY SECTOR OF THE EU ECONOMY AND KEY ENABLER FOR THE RECOVERY

- Safeguard and reinforce role of social enterprises
- Mainstream repair and second-hand textiles
- Integrate social enterprises in new circular business models
- Ensure Extended Producer Responsibility (EPR) implements waste hierarchy and integrates social enterprises
- Develop skills in post-consumer textiles management
- Develop new technologies for re-use of textiles

#### 2. CIRCULAR ECONOMY IN THE EU TEXTILE SECTOR

- Implement waste hierarchy
- Develop re-use and preparing for re-use targets
- Make right to repair textiles as inclusive as possible

- Promote usage of natural, durable, unblended fabrics
- Give information on expected lifetime
- Make recyclability compatible with reusability
- Make re-using and repairing more accessible (financially and technically)
- Develop separate collection that prioritises and facilitates re-use

#### 3. GLOBAL COMPLIANCE, DUE DILIGENCE AND TRANSPARENCY

- Promote consistent definition of end-of-waste that facilitates re-use
- Make sanctions for non-compliance more coercive
- Control and measure (rather than limit) export of post-consumer textiles

*RREUSE is a non-profit network organisation representing social enterprises active in the circular economy, notably in re-use, repair and recycling. RREUSE currently has 31 members from 26 countries in Europe and the USA, federating a wider network of approximately 850 individual social enterprises. These organisations collectively handle 1 million tonnes of goods and materials annually through which they provide job and training opportunities to over 100,000 individuals, many of whom are at risk of social exclusion. RREUSE's mission is to ensure that policies, innovative partnerships and exchange of best practices promote and develop the role of social enterprise and local inclusive jobs in the circular economy.*

## Introduction

As an international network of social enterprises active in re-use, repair and recycling, collectively handling around 260,000 tonnes of used textiles annually, RREUSE awaits the publication of an EU Strategy for Sustainable Textiles with anticipation. We believe that developing eco-design requirements for textiles will be a milestone in the development of products that are fit for a circular economy. To ensure textile products still hold value when reaching the second-hand market, the first step is to make them as durable as possible.

The three pillars of sustainability including environmental responsibility, social inclusion and economic viability, developing a Strategy for Sustainable Textiles in cooperation with social enterprises – *operators in the social economy whose primary objective is to have a social, societal or environmental impact over profit* – would be particularly meaningful. This would present considerable opportunities to create local, green and inclusive jobs in the EU. According to [recent social enterprise estimates](#), collecting and sorting 1.000 tonnes of textile with a view of being re-used is creating between 20 to 35 jobs.

RREUSE wants to ensure that the EU Strategy for Sustainable Textiles does not focus on recycling but instead prioritises activities related to waste prevention and preparation for re-use of waste textiles. To promote the implementation of a strategy that truly implements the waste hierarchy and foster the creation of meaningful employment and training opportunities, RREUSE calls on the Commission to implement the following recommendations:

- Help social enterprises active in the collection, sorting and resale of post-consumer textiles to safeguard and develop their activities
- Before encouraging consumers to purchase “sustainable” new textiles, support them to repair or purchase second-hand textiles in the first place
- Provide consumers with sufficient information about the negative impacts of purchasing new textiles, as well as about the positive environmental and social impacts of repairing or purchasing second-hand textiles instead
- Ensure that EPR schemes do not threaten social enterprise’ activities, notably through developing waste prevention and waste management targets following the waste hierarchy alongside social objectives
- Make textile products longer lasting, with less complex fibre blends (facilitating both re-use and recycling) and with standardised sizes
- Finance and facilitate the development of collection systems for post-consumer textiles
- Develop skills related to the prevention and sustainable management of waste textiles
- Avoid considering that investments in R&D and treatment facilities are only needed in the recycling sector (they are also needed for textile waste prevention and preparing for re-use)
- Ensure that the development of new business models do not compete with re-use operators and with consumers and independent repairers’ right to repair
- Clarify the end-of-waste status in a way that facilitates collection and helps prioritise re-use over recycling
- Severely sanction producers/designers of products that are non-compliant with EU’s legislative requirements (e.g. the same way planned obsolescence is sanctioned in France)
- Control and measure (rather than limit) the export of post-consumer textiles for re-use, reducing administrative burden while ensuring that the waste hierarchy is respected

In addition to these demands and those that can be found in the “[Recommendations for the EU Strategy for Sustainable Textiles](#)” developed by the Wardrobe Change Coalition (of which RREUSE is a member) and in “[The Civil Society Shadow European Strategy for Sustainable Textile, Garments, Leather and Footwear](#)” (co-signed by RREUSE and a number of its members), RREUSE would like to give more details on the logic behind its responses to the ongoing consultation:

## 1. TEXTILES, A KEY SECTOR OF THE EU ECONOMY AND KEY ENABLER FOR THE RECOVERY

### 1.1. How would you assess the relative importance of the following factors in promoting sustainability while ensuring resilience and competitiveness of the Textile Industry?

- RREUSE has mixed feelings about “***Supporting the uptake of circular business models among consumers (e.g. product-as-a-service, leasing, customised design)***”:

Encouraging producers/importers to develop product-as-a-service and leasing models can have the unintended consequence to trigger the development of monopolies for the management of used textiles, at a time when we need as many actors as possible to be involved in these activities. It is not yet demonstrated that these models automatically produce less waste or promote longer lasting products<sup>1</sup>. Also, these models risk competing with the activities of social enterprises that are currently providing job and training opportunities to people at risk of socioeconomic exclusion through their post-consumer textiles collection, management and resale activities.

If these new circular business models end up being financially supported by the EU, it will be essential to ensure that social enterprises have a role in their development. The expertise of these actors in the sustainable management of post-consumer textiles will be invaluable to the implementation of greener business models. Supporting the development of social enterprises is considered as a priority in the EU: an [Action Plan for Social Economy](#) will be developed by the end of the year. Therefore, it is the uptake of circular and social – or sustainable – business models that should be supported. The EU Strategy on Sustainable Textiles should investigate solutions that will help social enterprises develop these new circular business models themselves or partner with enterprises who wish to implement them.

- RREUSE suggests adding the following factor to the list provided in question 1.1: “***Providing economic operators with the necessary information about the positive environmental and social impacts of social enterprises active in the resale, repair and recycling of textiles***”:

One of the three pillars of sustainability is social impact. The sustainability and resilience of the Textile Industry will benefit greatly from a prominent role of social enterprises active in that sector. These

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<sup>1</sup> The Guardian, [Renting clothes is ‘less green than throwing them away’](#) (2021)

actors already implement business models that are sustainable, inclusive and circular: their role should be recognized and promoted towards the economic operators.

- RREUSE believes that if ***“the conditions to ensure sufficient flow of recycled materials”*** must be created, there is also a need to ***“create the conditions to ensure sufficient flow of second-hand textiles”***:

The EU is facing new requirements under the Waste Framework Directive to separately collect textiles by 2025. This will result in a significant increase in the quantity of textiles being collected and - if not well managed – in a subsequent increase in volumes exported. While textile exports for reuse will continue to play an important role in the future, they represent a loss in value of reusable items and associated environmental and social impact to the local market. We believe it is critical to support greater levels of local reuse and repair through investments in infrastructures (particularly in partnership with social enterprises) and other measures. This will not only support the social benefits of reuse but will also improve the environmental benefits of post-consumer textiles management (through reduced transport), support the local economy and build local resilience.

- In addition to ***“Providing economic operators with the necessary information about environmental and social impacts of textiles along the whole value chain”***, the EU has an opportunity to take a leadership role in **developing an EU-wide convention for labelling that requires transparency**:

Many re-use and recycling operators complain that the accuracy of the information accessible on labels is not guaranteed. Labelling transparency to clearly identify the fabric blends in textile products is essential to facilitate better management of waste textiles. This would not only help some forms of reuse, upcycling and downcycling but would facilitate the better separation of textiles by category for recycling. Where EPR schemes are in place, the modulation of fees would also encourage - alongside more transparent labelling - producers to place materials that are more recyclable on the market.

## **1.2. Which of the tools listed below should be given priority at EU level to recover from the crisis and promote resilience and sustainability of the textile industry?**

- RREUSE remains cautious with the suggestion to ***“Require Member States to implement mandatory Extended Producer Responsibility for textiles (and footwear)”***:

As explained in detail in [this position paper on EPR](#), as well as in this [paper developed with the “Wardrobe Change Coalition”](#), EPR can be counterproductive if implemented without clear targets on waste prevention and preparing for re-use. It also bears risks of disrupting the collection activities currently conducted by social enterprises. If producers/importers are responsible for the collection and management of waste textiles, we can expect recycling to be prioritised over prevention and preparing for re-use. Requiring Member States to implement mandatory Extended Producer Responsibility for textiles (and footwear) should go together with an obligation for Producer Responsibility Organisations or producers to guarantee that collection models and sorting facilities will prioritise re-use over recycling and promote circular design. Specific targets on textiles re-use could be developed, [as it is currently discussed in the Netherlands](#). Safeguarding a share of EPR fees

to social enterprises re-use activities, [as this will be the case in France](#), can also be a way to encourage socially and environmentally responsible re-use.

- In addition to **“Promot(ing) the development of skills applicable to sustainable textile production (e.g. design, product development)”**, consider **promoting the development of skills in post-consumer textiles management (e.g. repair, sorting out, re-use, upcycling, remanufacturing)**:

The development of skills should not be considered only for the design phase. Jobs in the post-consumer textiles management will have to be created to cope with the increasing quantities of clothes that will be collected once the mandatory separate collection of waste textiles kicks in (2025). In fact, and considering that a successful implementation of circular policies should make the quantity of textiles produced and placed on the EU market decrease, support for textile workers currently dependent on the existing system of overconsumption is required to provide for a just transition and support a fair circular economy. In addition, measures are needed to incentivise the reuse, repair and upcycling of waste fabrics (e.g. financial reward to companies that partner with reuse or upcycling initiatives to use waste fabrics and materials).

### **1.3. In your opinion which of the following technologies will contribute most to support a competitive and sustainable textile sector in the EU?**

In this section 1.3, the focus is clearly on technologies that are related to the production and the recycling of textiles. However, a circular economy approach is required involving the entire life cycle of textiles including technologies supporting circular design and reuse.

With regards to technologies supporting the competitiveness of the textile sector, there exists a lot of room for complimentary technologies to human labour in the collection and sorting process for used textiles. They should help improve re-use rates, confirm the economic viability of re-using post-consumer textiles, create new jobs / training opportunities and improve the conditions of workers involved in these activities. The objective should not be to replace manpower with machines in the name of cost reduction. Such technologies can include support infrastructure for collection and sorting through to sales and marketing of used textiles.

For example:

**Digital donations & e-commerce platforms for re-use of goods:** Many social enterprises selling second-hand textiles have developed or are thinking about developing online e-commerce platforms ([Thriftify](#) and [Label Emmaüs](#)) in order to maximise their sales. Donation apps and platforms are of high interest for re-use operators to make it easy for citizens to donate goods to social enterprise and buy second-hand ([Fairwertung](#), [Sachspenden.at](#), [Trëmma](#)).

Further developments in AI and computer vision technology being trialled in a number of contexts could also help re-use operators identify the condition and value of a used item just by taking a picture. Such tools help to make the of processing used textiles items more efficient and increase the volume of used clothing placed on the second-hand market.

**Sorting of used textiles:** There exist a great many ways to improve the efficiency of the textile sorting process. For example, the [JRC's Circular Economy Perspectives in the EU Textile sector](#) (page 73), provides an example of sorting technology aiding workers in their activities. It consists of using your voice, through a headset, to classify textile by material, quality and texture. Similar techniques could also be investigated, trialled and replicated.

Other technologies that would facilitate the differentiation between re-usable textiles and textiles that cannot be re-used (because overly stained, damaged by holes or discoloration, etc.) could also be developed.

## 2. CIRCULAR ECONOMY IN THE EU TEXTILE SECTOR

### 2.1.1. Which elements of circularity in the value chain do you consider should be tackled as a priority?

- **“Ensuring repair services and consumers rights to repair”** should be as inclusive as possible:

Repairing textiles products should be possible for both consumers and independent repairers. Attempts to develop monopolies on the repair of textiles, for example through giving access to repair information, spare parts or fabrics to a selected number of authorised repairers or making the repair of a textile product possible only at the shop of the retailer, should be prohibited.

### 2.2. Raw materials

#### 2.2.1. Which element of raw material selection do you consider should be prioritised in order to promote sustainability?

- RREUSE suggests adding this following element: **“Promoting the utilisation of quality raw materials that make textile products durable and easy to maintain”**:

Avoiding the use of mixed fibres and plastic based fibres, beyond making textile products easier to recycle, also raise their value and make them easier to sell second-hand.

Encouraging designers to use recycled materials is a good solution to reduce the environmental impact of the textile industry. However, this should not compromise the purity of the materials used. If using recycled content means blending several materials together and making products difficult or impossible to recycle, there is clearly an issue. The use of recycled materials should not compromise the durability, the quality, the non-hazardousness and the recyclability of products.

## 2.4. Design of products

### 2.4.1. In order to facilitate the transition to a more circular economy, how would you assess the relative importance of the following product features?

- **“Technical durability and information on the expected lifetime”** are essential features for the reusability of textiles:

The longer textile products can last, the higher the chance they will reach the second-hand market in a decent condition. To inform consumers about the expected lifetime of textile products, RREUSE would recommend using the number of washes after which the product starts to wear in a noticeable way. This number could be accessible next to the logo informing the consumer about the recommended washing temperature.

To accompany any labelling initiatives, a public awareness and education campaign is essential to encourage consumers to pay attention to maintenance recommendations.

- **“Reusability: upgradability, modularity, size and shape flexibility”** and **“Lower resource demand for care and maintenance (e.g. require less frequent laundering, lower temperature, easy/no iron etc.)”** should not go against recyclability:

RREUSE understands the need to look into upgradability, modularity, size and shape flexibility as product features. However, there are risks that these features will compromise recyclability in the long run. Shape flexibility might require a blend of organic and plastic fabrics that will be difficult to recycle. Same issue with product features that lower resource demand for care and maintenance.

RREUSE believes that it is possible to address both durability/reusability and recyclability. As explained previously, textile products that are easy to recycle (because containing only one type of organic fibre) are often those that are of higher quality and that easily find their way to second users. Therefore, to enhance reusability, it is important to choose solutions that do not compromise recyclability.

- **“Availability of information on product repair”** and **“Product design facilitating maintenance and repair activities and availability of spare parts”** should be inclusive:

Information on product repair and spare parts must be accessible to consumers and independent repairers too (not only to retailers or authorised repairers as it is often the case for electronics). These features should also be accessible at a reasonable price.

- RREUSE also suggests adding the following product features:
  - **“Reusability: Standardised sizes”**:

Too often, clothes’ sizes do not mean the same depending on which country the product comes from or on which brand designed the product. This confuses consumers and discourages them to visit second-hand shops (they fear to spend too much time trying clothes before finding the right size). This is also a serious limitation to the purchase of second-hand clothes online. Such standardisation should

be based on an objective measurement and avoid the usage of terms that can feel discriminatory (eg. Small, Medium and Large). This would also limit the practice of purchasing several sizes of the same item online, a practice which is common for consumers who want to receive at least one item that fits (and which is facilitated by free return policies). This proposal should be taken into account when reviewing the labelling of textiles.

- **“Reusability: Ease of disassembly and durability of components”:**

Repairers should be able to replace the parts that are quickly wearing with spare parts that are, themselves, durable. For example:

- Zippers that break often and are difficult to remove and replace
- Elastic bands that are often sewed in instead of just being laced in
- Etc.

- **“Reusability: Gender neutrality”:**

For young children’s clothing, **gender neutrality** is also a feature that can help increase reusability. This would, for example, facilitate the transmission of clothes between siblings, at least until a certain age.

## **2.4.2. How can the environmental impact from microplastics shed from clothing/textiles best be tackled without causing environmental problems in other areas?**

RREUSE agrees with **“Developing eco-design measures, such as essential requirements per fibre type (e.g. filament, staple fibre) that ensure low shedding rates”**, unless these measures require complex blends or designs that will reduce their reusability/recyclability.

## **2.5. Consumption Behaviour**

### **2.5.1. How would you assess the relative importance of the following measures to promote sustainable consumption behaviour at EU level?**

- In the suggestion to **“Encourage economic incentives to buy sustainable/circular textiles (e.g. through differentiated taxation levels depending on products’ resource efficiency)”**, RREUSE insists that second-hand textiles are included in the definition of **“sustainable/circular textiles”**:

As they take precedence in terms of resource efficiency, incentives for **repairing clothes** or **purchasing second-hand textiles** (such as reduced or zero VAT) should be more rewarding than those that will encourage people to buy new **“sustainable/circular”** textiles. Working on **educating consumers and mainstreaming second hand goods** through driving demand and investing in marketing should also be investigated.



- RREUSE suggests adding the following measure: **“Thoroughly measure textiles placed on the EU market and post-consumer textile flows”**:

This will help identify what policies are needed to drive down the consumption of new textiles and foster the uptake of second-hand textiles and repair services.

### **2.5.2. Which of the following business models contributing to a circular economy do you believe have most potential for economic viability and upscaling?**

- RREUSE strongly advises against collection models based on the **“Take-back and resell of own brand products”**:

These practices are very likely to trigger the creation of monopolies that will threaten the textile repair and re-use sector. Take-back and resell of clothing exists for decades and is implemented by independent operators, a lot of them being from the social economy sector. Encouraging brands/retailers to collect back their own products will seriously impact these activities that are providing job and training opportunities to people at risk of socio-economic exclusion.

In addition, when collecting post-consumer textiles, retailers often incentivise discarders to purchase new items thanks to vouchers. This practice is in opposition with the development of sustainable consumption and simply encourages the purchase of new clothes.

## **2.6. Post-consumer textiles reuse and recycling**

### **2.6.1. How would you assess the relative importance of the following challenges to a greater reuse of used textiles? (note that challenges to recycling are considered later)**

- RREUSE admits that there is still a **“Lack of separate collection systems for post-consumer textiles and textile waste”**:

Bearing in mind the mandatory separate collection of textiles that will start in 2025, these collection systems need to be more widespread and tailored to the needs of discarders. This requires significant investments in new infrastructure. Different forms of collection points in places that are usually busy (offices, public spaces, supermarkets, etc.) should be experimented to identify what are the best solutions to maximise collection. Digital tools such as smartphones’ applications (eg. [DonateNYC](#) in New York, [Altkleiderspenden](#) in Germany or [Sachspenden](#) in Austria) should be developed to help discarders locate the places where they can donate/discard textiles. As many stakeholders as possible should be involved in the collection of post-consumer textiles and textile waste, and access to this material should be given to social enterprises in priority.

These collection models should also be more communicated and financially supported by municipalities or EPR schemes when they exist. Some municipalities are still making collectors of used textiles pay for the right to set up collection containers on their territories, even though it is in

municipalities' interest to let collectors settle down, notably thanks to the resulting reduced cost of waste management.

- RREUSE believes that the **“Saturation of global markets for second-hand textiles”** is overrated and should not justify a focus on recycling activities:

It is true that the overconsumption of textiles, which itself results from the low price, durability and quality of new textiles, makes the absorption of second-hand textiles by the global market more difficult. However, looking at the number of unsold clothes that get discarded, it is possible to say the same of new textiles.

RREUSE does not believe that the global market for second-hand textiles can be considered as being saturated. The export of used textiles is still practiced by a great number of re-use operators, demonstrating that this market does exist. In no case should the assumption of a saturated global market for second-hand textiles lead policy makers to believe that recycling is the main solution for re-usable but redundant textiles.

However, it is necessary for the quantity of new textiles put on the EU market to drastically decrease and for the local demand for second-hand textiles to be fostered through developing local behaviour change and creating local markets for re-use as a priority. The proximity principle should be kept in mind so that the proportion of used textiles collected in the EU that is re-used in the EU (or preferably in the region/country where it is collected) is the highest possible.

- RREUSE suggests adding the following challenge to a greater reuse of used textiles: **“Lack of separate targets for preparing for re-use/re-use to be implemented at national/regional level”**

It is suggested in section 2.6.2 that there is a **“Lack of targets for reuse and recycling to be implemented at national level”**. RREUSE would prefer to mention, in this section 2.6.1, the **lack of separate targets for preparing for re-use/re-use to be implemented at national/regional level**.

The updated Waste Framework Directive features an obligation for Member States to report their preparing for re-use rates separately from recycling rates as well as to monitor data on re-use. By the end of 2024, the European Commission must look into the feasibility of setting separate quantitative targets for re-use and preparation for re-use rates<sup>2</sup>. Re-use and preparing for re-use targets, whether applied within the framework of an EPR scheme or not, are essential to enhance cooperation between all actors of the re-use value chain (preparing for re-use and re-use operators, municipalities, waste management operators, producers, PROs and retailers). Examples of national and regional re-use and preparing for re-use targets can be found in Spain, Flanders and France.

- RREUSE suggests adding the following challenge to a greater reuse of used textiles: **“Lack of concrete legal implementation of the waste hierarchy”**

The whole questionnaire, and particularly section 2.6 gives the reader the impression that recycling is prioritised over waste prevention and preparing for re-use. The mere fact that 200 characters are left

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<sup>2</sup> [RREUSE \(2018\), RREUSE position on the updated EU Waste Framework Directive](#)

to the respondent to complete section 2.6.1 on re-use whilst 500 characters are available for section 2.6.2 on recycling translates this approach. The EU Strategy on Sustainable Textiles needs to concretely implement the waste hierarchy and :

- Decrease the overall consumption of new textiles
  - Improve the price competitiveness of reused textiles and repair compared to new textiles (e.g. through economic instruments)
  - Increase utilisation of reused textiles by ensuring its quality/safety/durability
  - Act on the lack of demand from end-consumers (households and public bodies) for second-hand textiles
- RREUSE suggests adding the following challenge to a greater reuse of used textiles: **“Coping with non-reusable textiles”**

In the post-consumer textiles value chain, re-use operators are often the first to conduct sorting operations. This means that they will be the first to cope with the share of collected textiles that is non-reusable. A first classification between what can be recycled and what must be directly landfilled / incinerated often happens at this stage. Managing this non-reusable share is costly and reduces the viability of re-use activities.

To support the re-use sector, it is essential to also finance the collection, sorting and disposal of the non-re-usable fraction. Financial support from municipalities or EPR schemes (if they exist) should be investigated to cover these costs. However, by doing so, and following the principles of the waste hierarchy, it is important to make sure that re-use remains more financially interesting than recycling for re-use operators.

### **3. GLOBAL COMPLIANCE, DUE DILIGENCE AND TRANSPARENCY**

#### **3.1. Which of the following aspects are in your opinion more effective to promote sustainability (including fair wage, decent working conditions and labour and human rights) across the value chain?**

As a general comment to this section, RREUSE is calling for robust employment legislation to be required in every country from which textiles are imported. In particular, there is a need for strict supply chain responsibilities including guarantees of fair pay for textile workers in non-EU-countries, based on respective national norms or at least on ILO norms.

- **“Ensuring consistency on definitions of waste/non-waste with respect to used textile collection”** should facilitate the re-use of post-consumer textiles:

Clarifying the definitions of waste and non-waste is a prerequisite to the smooth management and flow of used textiles. However, a balance must be found between unregulated collection and movement of used textiles and collection which would be too costly and administratively burdensome.

Classifying used textile collection points as waste collection points might make it difficult to set them up in certain places where environmental regulation forbids to set up waste management facilities. However, it is also important to ensure that what is collected in used textile collection points will be sorted out to separate waste items from re-usable textile. Beyond a mere clarification on definitions of waste/non-waste, the Commission should look into:

- Making post-consumer textile collection points easy to set up in places that are accessible and visible to discarders
- Ensuring that collected used textile will go to sorting facilities that will, according to a transparent process, separate residual waste from re-usable items and recyclables
- Ensuring that what is considered as re-usable after the sorting process is considered as non-waste

### 3.2. Which of the following instruments should be given priority to ensure that imported textiles materials and products comply with EU's legislative requirements?

- RREUSE suggests adding the following instrument: **“Severely punishing producers/importers putting products that do not comply with EU's legislative requirements on the EU market”:**

For example, in France, planned obsolescence is a felony punished with up to two years of imprisonment and €300.000 fines.

After a certain number of products declared as non-compliant with EU's legislative requirements, the individuals responsible for the design of these products should be forbidden to operate.

### 3.3. Which of the actions listed below should be given priority to ensure that separately collected post-consumer textiles in the EU are processed and treated with due diligence to the waste hierarchy, environmental protection, human and labour rights and decent working conditions abroad?

The best way to ensure that separately collected post-consumer textiles are properly processed and treated is to re-use these products as locally as possible, notably where it is easier to ensure that the waste hierarchy, environmental protection, human and labour rights and decent working conditions are respected. It is already in the social/environmental objectives and in the financial interest of social enterprises active in the collection and resale of post-consumer textiles to maximise the share which is re-used locally. However, while waiting for EU policies to mainstream more circular business models, exporting used textiles remains the best solution to extend the lifetime of products that do not meet their demand locally. To limit the unintended negative consequences of exporting used textile, we need:

- To support operators that are prioritising local re-use over direct export
- To help operators finance the pre-sorting of post-consumer textiles
- To make it gradually more difficult (even though not impossible) to export post-consumer textile, depending on the status of what is exported (re-usable, recyclable or unsorted).



- More transparency on the destination of what is exported
- More transparency on the status of the exporters/beneficiaries (e.g. commercial recyclers vs charities)
- More support (through EU budget or EPR) for importing countries to properly deal with end of life management of post-consumer textile

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