



# Submission to EU strategy for sustainable textiles roadmap

## 1.0 Background Context - RREUSE

CRNI is a member of RREUSE, 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. We fully support and have included below the RREUSE feedback on the EU Strategy for Sustainable Textiles Roadmap.

## 2.0 Textile reuse in Ireland

Of the 257,000 tonnes of textiles that RREUSE members handle across Europe annually, approximately 14,500 tonnes is handled in Ireland.

This is largely managed by a very active and extensive network of charity shops (with over 460 shops across the country) through the [Irish Charity Shops Association](#) (ICSA). Our members also upcycle textiles ([Rediscovery Centre](#), [Roscommon Women's Network](#)), provide lending services ([Cloth Nappy Library Ireland](#)), online marketplaces ([thriftify](#), [FreeTrade Ireland](#)) and raise awareness through education and workshops in schools and the community ([Rediscovery Centre](#), [Cloth Nappy Library Ireland](#), [the UseLess Project](#)).

## 3.0 Give priority to prevention and preparing for re-use

We agree with the following **RREUSE position**:

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<sup>1</sup> or supporting repair and re-use activities?

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<sup>1</sup> 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](#)



Buying a used TGLF item instead of a new one reduces its carbon footprint by 82%<sup>2</sup>. 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 reuse activities.

Fortunately, the roadmap states that the waste hierarchy will be considered when studying the role of EPR. Whether linked to EPR schemes<sup>3</sup> 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.

## 4.0 Protect re-use operators of the social economy

We agree with the following **RREUSE position**:

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.

Collection, sorting and sales of second-hand TGLF can locally create 20 jobs per 1,000 tonnes of used clothes and shoes<sup>4</sup>. 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.

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<sup>2</sup> ThredUp (2019), Resale report – Available [here](#)

<sup>3</sup> RREUSE (2020), Extended Producer Responsibility and the role of social economy re-use operators: Implementing a socially inclusive waste hierarchy – Available [here](#)

<sup>4</sup> RREUSE (2016) Ethical principles for the clothing re-use sector – Available [here](#); RREUSE (2015) Re-use has higher employment potential than recycling – Available [here](#)



CRNI would like to propose two further measures to protect the social impact of textile prevention and reuse.

**1. A balance must be struck between supporting local reuse and facilitating the export of textiles**

The impacts of CRNI's social enterprise members in textile reuse are wide ranging and include carbon savings, supporting local jobs, training and volunteer opportunities, and in many cases<sup>5</sup> raising much needed funds for essential services (e.g. over 50% of ICSA members raise funds for health, housing and disability services). Through providing affordable fashion and other household goods, they also support low income families.

It is not as well understood that textiles collected by commercial operators in Ireland (via bring banks or in schools or sports clubs) are primarily sent for export. While textile exports for reuse will continue to play an important role in the future, both in Ireland and across Europe, they represent a loss in the value of the reusable item and associated social impact to the local market. The export of goods can also have negative social and environmental impacts<sup>6</sup> on receiving markets. Some countries<sup>7</sup> have been pushing back more recently on textile imports particularly where these are lower quality.

The EU is facing new requirements under the Waste Framework Directive to separately collect textiles by 2025. This could see a significant increase in the quantity of textiles passing into the reuse sector and - if not well managed - significant increase in volumes exported.

We believe it is therefore critical at this time to build into the roadmap support for greater levels of local reuse and repair through investment in infrastructure (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 textile management (through reduced transport), support the local economy and build local resilience.

**2. A Just Transition plan is required to support textile workers who are dependent on the existing system of overconsumption in order to support a fair circular economy**

The Covid-19 pandemic has had an important impact on the whole textile sector. The impact has been particularly severe on garment workers, as the fallout from cancelled orders (due to reduced

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<sup>5</sup> including the [ICSA](#) and its members, [Roscommon Women's Network](#), [Gateway to Education Limerick](#) and [East Belfast Mission](#)

<sup>6</sup> <https://www.textilemountainfilm.com/>

<sup>7</sup> e.g. Rwanda, Uganda, Tanzania all contemplated bans in 2018 - see <https://www.dw.com/en/east-africa-pushes-second-hand-clothing-ban/a-42747222>



consumption) has taken its toll. According to the Worker Rights Consortium (WRC)<sup>8</sup>, based on interviews with nearly 400 garment workers across the world, almost 80% of workers, many making clothes for some of the world's largest fashion brands, are going hungry. Almost a quarter of those surveyed said that they were facing daily food shortages.

Clearly any future policy that aims to reduce the current levels of overconsumption in favour of a more circular economy model - as is required to support climate goals and social good - must also take into account these workers and the potential impact on their livelihoods. A Just Transition plan is therefore required to mitigate the impact of circular economy policy on these workers.

## 5.0 Voluntary approaches and new business models are not enough

We agree with the following **RREUSE position**:

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<sup>9</sup>, 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.

CRNI would like to add three further points to this theme:

### 1. Stronger measures are required to halt the destruction of returned goods

Our members have raised particular concerns regarding the destruction of returned goods by retailers. We submit that stronger measures, such as legislation, are required to ensure retailers manage garment returns in a more responsible manner. Alternatively, it should be made more cost effective to clean, repack and resale items than to destroy or prematurely recycle them.

### 2. Measures are needed to incentivise the reuse, repair and upcycling of waste fabrics

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<sup>8</sup> See article [here](#)

<sup>9</sup> Circle Economy, European Environmental Bureau, Fair Trade Advocacy Officer – Available [here](#)



Our members have also suggested that measures should be introduced to financially reward companies that partner with reuse or upcycling initiatives to use waste fabrics and materials. This could take the form for example of gift aid or other such incentives.

### 3. Better labelling transparency is required to facilitate better management of textile waste

In addition to the proposed measures that support reuse (such as making textile products more durable and repairable), better labelling is needed to clearly identify the fabric blends in textile products. 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<sup>10</sup> the modulation of fees would also encourage - alongside more transparent labelling - producers to place materials that are more recyclable on the market.

## 6.0 Community Resources Network Ireland

CRNI's vision is an Ireland where the word waste doesn't exist and the entire community benefits from the environmental, social and economic benefits of reuse. We work towards this vision by supporting our members, mainstreaming community resources and developing our capacity and are funded by the EPA under the National Waste Prevention Programme.

We represent a diverse range of 37 social enterprises, funded projects and other enterprises in reuse, repair and recycling as shown [here](#). The **environmental, social and economic benefits** of our members in 2019 were as follows:



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<sup>10</sup> RREUSE (2020), Extended Producer Responsibility and the role of social economy re-use operators: Implementing a socially inclusive waste hierarchy – Available [here](#)