

Submission from Community Resources Network Ireland (CRNI) to the Department of Climate, Energy and the Environment on the Textiles Extended Producer Responsibility (EPR) Delivery Plan

September 2026

Introduction

Community Resources Network Ireland (CRNI) is the all-island representative body for community-based reuse, repair, recycling and waste prevention social enterprises, and sits at the intersection of the circular and the social economy in Ireland.

Almost 45% of our membership base is active in the textiles sector, working across reuse, repair and recycling. Their shared purpose is to keep products and their value in the loop and within the community, delivering environmental, social and economic benefits.

CRNI is a member of the Department of Climate Energy and the Environment's Textiles Advisory Group. Our members The Rediscovery Centre, Charity Retail Ireland, Change Clothes, We Make Good, and Oxfam are also active members of this body. This submission has been prepared with the direct input of CRNI's textiles members and reflects their experience of operating within Ireland's existing textiles reuse and recycling infrastructure.

CRNI welcomes the opportunity for stakeholder engagement in the design of Ireland's Textiles EPR scheme and supports the Department's intention that the scheme should uphold the waste hierarchy, support the social economy and strengthen existing reuse and repair systems.

However, these principles need to be embedded throughout the design, governance, financing and operation of the EPR scheme rather than treated as individual or secondary measures.

The EPR cannot meet its legal waste-hierarchy obligations without a strong reuse system. Ireland already has an established network of charities, social enterprises and community based organisations collecting, sorting, preparing for reuse, repairing, redistributing, upcycling and reselling textiles. The EPR system should therefore strengthen, invest in and expand this infrastructure and create pathways for textiles at different grades to remain in productive use locally rather than create a parallel system that competes with or displaces it.

In particular, CRNI is concerned that a highly centralised EPR model driven principally by tonnage collected, processing efficiency or recycling volumes could unintentionally divert reusable material away from existing organisations and towards larger-scale waste-management routes. The success of the EPR scheme should instead be measured by how effectively it prevents waste and keeps textiles in use at the highest possible level of the waste hierarchy.

CRNI's comments below, organised by theme, set out how we believe this principle should be reflected in governance, funding, collection, access to materials, eco-modulation, quality assurance, data, targets and implementation.

We encourage the Department to align the EPR scheme development and delivery in both timeline and content with related EU and domestic developments and that the timeline set out in Section 6 of the Plan is adhered to, given the scale of preparation required across the value chain before the April 2028 go-live date.

CRNI's core requirements for a successful Textiles EPR scheme

CRNI considers that Ireland's Textiles EPR scheme should be designed around seven core requirements.

- First, the waste hierarchy must be given a practicable and legally enforceable effect. Prevention, reuse, preparation for reuse and the other value-retention practices such as sorting/triage, direct reuse, redistribution, preparation for reuse, remanufacturing/upcycling must be prioritised before recycling, recovery or disposal. These requirements should be reflected in national regulations, the terms of the PRO Approval, investment decisions, collection arrangements, contracts and performance indicators.
- Second, producer fees must meet the full reasonable and necessary costs of collection, transport, sorting and preparation for reuse where these activities are undertaken as part of the EPR system. Community-based social enterprises or charities should not be expected to subsidise delivery of producers' EPR obligations through their own trading income, charitable funds, volunteer contributions or grants.
- Third, a defined proportion of EPR resources should be earmarked for the development of reuse and repair infrastructure, organisational capacity, innovation, skills and quality assurance. This should be additional to the reimbursement of operational costs incurred in delivering EPR functions.
- Fourth, qualified social enterprise, charitable and non-profit reuse organisations should have reuse-first access to textile streams suitable for reuse or preparation for reuse, before those materials are allocated to recycling, export or other lower-order treatment.
- Fifth, social enterprise and non-profit reuse actors must have mandatory and continuing representation within the governance of the PRO and on all relevant committees and working groups dealing with issues such as collection, reuse, investment, targets, data, quality assurance, communications and infrastructure.
- Sixth, the EPR scheme must strengthen and invest in Ireland's existing value-retention infrastructure rather than displace it through a centralised, volume-driven waste-management model. Existing donation, charity retail, social enterprise and community reuse systems should be recognised as part of Ireland's national circular infrastructure and as delivery partners within the EPR system, and their local and regional capacity should be further developed.

- Lastly, we call for a commitment to increased traceability of textile flows and outcomes, so that materials can be tracked beyond collection and the actual destination and value-retention outcome be demonstrated.

Role of the social economy

The social economy already plays a vital role in Ireland's textiles reuse sector, but it remains vulnerable.

Social enterprises and community-based reuse and repair organisations face a distinct set of barriers, including: access to suitable material streams; competition from subsidised or better capitalised treatment pathways; limited access to infrastructure and innovation funding; procurement processes designed around larger commercial suppliers; premises and resource constraints; regulatory and insurance costs; skills and data requirements and dependence on short-term project funding that does not fund the organisational capacity required to deliver at scale.

Despite their challenges, social enterprises and community-based repair and reuse organisations are already providing many of the outcomes that the EPR scheme is intended to achieve.

Through collection, sorting, preparation for reuse, repair, resale and upcycling, these organisations extend product life, prevent significant volumes of textiles from becoming waste and reduce demand for new resources. They also generate social and economic value through employment, training, volunteering, community engagement and opportunities for people who may be distanced from the labour market or at risk of social or economic exclusion. This triple bottom line of environmental, economic and social return is a distinguishing feature of the sector, and one that a producer-led PRO acting on its own can't replicate.

On this basis, it's clear that the social economy can provide specialist operational infrastructure within a textiles EPR scheme, including sorting, grading, redistribution, preparation for reuse, remanufacturing, data collection and skills development.

CRNI therefore recommends that the Delivery Plan explicitly recognise community-based reuse and repair organisations and social enterprises as delivery partners within the EPR system, rather than solely as stakeholders or potential beneficiaries of funding.

Full cost coverage and investment in reuse

The design and implementation of EPR measures should take account of their long-term impact on the resilience, capacity and sustainability of the existing reuse, repair and recycling sector. Funding and investment decisions should strengthen the infrastructure, organisational capacity, skills and market conditions needed to sustain and scale these activities over the long term, rather than focusing solely on the immediate operational requirements of the EPR scheme.

The introduction of a textiles EPR scheme has the potential to create a genuine market for circular textile services. Sorting, preparation for reuse, redistribution, remanufacturing, traceability and community engagement are services required to deliver the scheme, and should create sustainable contracted and traded-income opportunities for social enterprises, who tend to primarily rely on short-term and unpredictable grant funding.

The principle that producer fees fund the management of used and waste textiles must extend explicitly to the activities undertaken by social economy, charitable and non-profit reuse operators on behalf of the EPR system.

Where such organisations undertake collection, transportation, sorting, preparation for reuse, repair-related preparation, data collection or other activities required to fulfil EPR obligations, the full reasonable and necessary costs of those activities should be funded through producer fees on a transparent and equitable basis.

This should be clearly distinguished from investment funding.

Operational cost coverage reimburses organisations for delivering functions required by the EPR scheme. Investment funding is required to build the infrastructure and capacity necessary to increase reuse and preparation for reuse over time.

CRNI therefore recommends that the final Delivery Plan:

- Ensure that producer fees cover the reasonable and necessary costs incurred by qualified reuse operators in undertaking collection, transportation, sorting, preparation for reuse and associated EPR activities.
- Establish a dedicated and clearly identified investment allocation for reuse and repair infrastructure and capacity.
- Ensure that this investment can support premises, sorting and preparation-for-reuse facilities, storage, equipment, repair capacity, vehicles, digital and data systems, staff skills, organisational development, sorting infrastructure, digital traceability systems, material identification/grading, remanufacturing equipment, workforce development and other infrastructure necessary to increase reuse.
- Provide dedicated investment in quality assurance, product safety, traceability, testing, grading and preparation-for-reuse processes.
- Support the development and adoption of recognised quality standards and assurance systems, building where appropriate on previous initiatives within the reuse sector such as CRNI's Remark project.
- Provide funding for innovation and demonstration projects that increase the quantity, quality and economic viability of textiles retained for reuse.
- Focus on funding being directed to the domestic social and circular economy sector, rather than being used to export textiles for processing elsewhere.
- Specify a minimum proportion or level of relevant PRO expenditure to be directed towards prevention, reuse, preparation for reuse, repair and associated social economy infrastructure rather than leaving this entirely to the discretion of the PRO.

- Require annual public reporting on expenditure directed towards prevention, reuse, repair, preparation for reuse and social economy participation.
- Include funding models that recognise that maximising reuse often requires more labour per tonne than lower-order bulk processing. This labour should be understood as value creation rather than inefficiency.

Awareness and community engagement

Social enterprises and community-based reuse organisations are also important channels for public awareness, behaviour change and knowledge sharing.

Their position within communities provides a level of trust, visibility and practical engagement that complements national advertising and information campaigns. Many already work directly with citizens to promote donation, reuse, repair, responsible consumption and correct handling of post-consumer textiles.

The PRO's awareness programme should therefore include a dedicated community delivery component.

Funding should be available to community-based reuse and repair organisations to undertake local awareness and behaviour-change activity, with campaigns linked directly to practical opportunities for citizens to reuse, repair, donate and participate.

Funding for awareness raising activities should also include physical opportunities for participation, places where citizens can donate, swap, access affordable clothing and materials, learn skills and gain knowledge on the sector. This would allow for community engagement to be embedded in the EPR infrastructure, rather than just a communications activity.

Governance of the PRO

CRNI considers formal representation of the social economy and non-profit reuse sector within the governance of the PRO to be essential.

The PRO will make significant decisions affecting access to textile materials, collection infrastructure, contracting, producer-fee expenditure, investment priorities, targets, data requirements, communications and the future structure of textile reuse in Ireland. Organisations already responsible for a substantial proportion of reuse activity must therefore have a meaningful role in these decisions. Representation should not depend solely on the discretion of the PRO.

Approval to operate the PRO should require formal and continuing representation of social enterprise, charitable and non-profit reuse organisations within its governance arrangements,

reflecting the diversity of textile reuse activity, including smaller/community operators and organisations involved in redistribution, preparation for reuse and remanufacturing. This should include representation on the PRO Advisory Committee and on relevant committees, technical groups and working groups dealing with matters directly affecting the sector, including collection design, reuse and preparation for reuse, investment, quality assurance, targets, data, awareness and infrastructure.

In addition to this, the Department of Climate, Energy, and the Environment (DCEE) should have final approval, following consultation of reuse operators, over major structural decisions relating to the EPR, including the level of fees, eco-modulation functioning, future targets, and implementation timelines.

CRNI is willing to work with the Department, prospective PRO and other stakeholders to support an appropriate mechanism for representative participation by the community reuse and social economy sector.

CRNI also considers it essential that community-based organisations are actively involved in the design, commissioning, delivery and evaluation of consumer awareness and behaviour-change campaigns.

The Delivery Plan should therefore:

- Require formal social economy and non-profit reuse representation within the governance arrangements required for PRO approval.
- Provide for mandatory representation of reuse organisations, social enterprises and charities on the PRO Advisory Committee and relevant working structures.
- Ensure that representation is meaningful and sufficiently early to influence decisions rather than operating solely as a mechanism for consultation after decisions have been developed.
- Include community-based social enterprises and reuse organisations in the design and delivery of consumer awareness and behaviour-change campaigns.
- Ensure that investment in the existing social economy reuse system is explicitly recognised as an eligible and important use of PRO funding and operating surpluses.
- In a producer-led PRO, consider mechanisms preventing conflicts of interest where organisations involved in allocating material or contracts are also their potential recipients.

Eco-modulation

Eco-modulation has significant potential to shift the textiles market towards more sustainable and durable products, and we recommend that this potential be more clearly articulated within the Plan.

Well-designed eco-modulation can make circular design the economically rational choice for producers, rather than a voluntary add-on, and can help correct the current market imbalance in

favour of low-cost, short-lived products. Eco-modulation should ultimately help drive better design upstream, not merely fund management of poor-quality textiles downstream.

Separate collection and producer responsibility for post consumer products are important measures, but overproduction and overconsumption remain significant drivers of textile waste. The EPR system should therefore address the characteristics of the products placed on the market as well as their management after use.

CRNI considers that durability, repairability, expected product lifetime, intended function and use, ease of disassembly and remanufacture, fibre/material complexity, availability and accuracy of product information, and realistic reuse potential should be central to eco-modulation criteria. Eco-modulation should distinguish between products based on their actual environmental characteristics and expected use and lifetime, rather than relying on price or product category as proxies for environmental impact.

Products designed to last longer, be repaired more easily and retain sufficient quality to enter second or subsequent lives should attract materially lower producer fees than products designed for short lifespans or with little realistic reuse potential.

Eco-modulation should also provide a meaningful economic signal. Differences in fees must be sufficiently significant to influence producer behaviour rather than simply becoming a marginal cost of doing business.

Eco-modulation should also be clearly distinguished from any separate fiscal measure applied to ultra-fast fashion, on the model of other European examples. Its purpose is to differentiate producer responsibility fees according to the environmental characteristics and impacts of products, rather than to operate as a general tax on particular products, brands or price points. If the Government wishes to consider a specific tax or other fiscal measure on ultra-fast fashion, this should be developed and assessed separately from the design of the EPR fee structure.

There is a strong need for improved information on textile flows and production volumes. CRNI therefore supports the periodic repetition of NATEX, or an equivalent assessment, after the implementation of EPR to provide a consistent evidence base for future policy.

CRNI also considers that supply-side measures such as eco-modulation should be complemented by appropriate demand-side measures to address the role of marketing and advertising in driving excessive consumption of short-lived fashion products. The Department should examine measures to reduce or restrict advertising practices that encourage overconsumption of products with limited durability, reuse potential or recovery value, recognising that producer fees alone cannot address the demand-side drivers of textile waste.

CRNI recommends that the final Delivery Plan:

- Establish eco-modulation as a central mechanism for reducing the environmental impacts of textile production and consumption.

- Require criteria to take account of durability, repairability, expected product lifetime, reuse potential, material composition and other relevant measures of circularity.
- Ensure that eco-modulation creates meaningful financial incentives for producers to move towards longer-lasting, repairable and reusable products.
- Investigate how production volumes, product price, product lifetime, repair costs and other appropriate indicators could contribute to addressing overproduction, subject to consistency with the developing EU framework.
- Investigate appropriate demand-side measures, including restrictions on advertising practices that contribute to overconsumption of short-lived and low-value fashion products.
- Require proactive Irish engagement with the European Commission as relevant EU eco-modulation criteria are developed.
- Investigate how indicators such as production volumes, company size, product price, time on the market and repair costs can be incorporated into eco-modulation, subject to consistency with the developing EU framework;
- Establish a statutory requirement for the NATEX study, or an equivalent assessment of textile flows and production volumes, to be repeated periodically following implementation of the EPR scheme, with the results used to assess progress and inform future policy and eco-modulation.
- Include a mechanism to measure local reuse outcomes and identify the funding that flows to community based projects as well as the social value created through job creation, training and community development initiatives supported by the circular economy.

Environmental Management Costs

We support transparency around Environmental Management Costs (EMCs). The textiles and fashion industries are already characterised by a lack of transparency concerning environmental impact and costs of production, consumption and post-consumer management. It's important to bridge this gap and communicate earnestly with consumers.

Making Environmental Management Costs visible could help consumers better understand the resources required to collect, sort, prepare for reuse and otherwise manage textiles after use.

However, these costs should not be presented in a manner that suggests environmental management is an optional consumer charge or that transfers producer responsibility onto the consumer, therefore transparency about where EMC/EPR funding ultimately goes is required. Consumers and stakeholders should be able to see what proportion supports prevention, reuse, preparation for reuse, social economy infrastructure and recycling respectively.

Overall, increased clarity is needed from the Department and industry on how much of the EPR fees on producers would be translated into increased prices for consumers.

The Delivery Plan should therefore:

- Clearly define which costs are included within Environmental Management Costs and how they are calculated.
- Ensure that producer responsibility for these costs is maintained irrespective of whether an Environmental Management Cost is displayed to consumers.
- Ensure that any visible cost information makes clear that the cost is incorporated within the EPR system and is not an optional environmental surcharge.
- Establish a consistent method for presenting Environmental Management Cost information across physical and online retail channels.
- Ensure consumer communications explain how EPR funding supports collection, sorting, reuse, preparation for reuse, recycling and other legitimate scheme activities.

Separate collection network

CRNI welcomes the recognition that the PRO may not deny social enterprises or reuse operators from participating within the separate collection system.

However, non-exclusion alone is insufficient.

Social enterprises, charities and community-based reuse organisations should be actively enabled to participate and should be recognised as part of the infrastructure upon which the new system should be built.

Ireland already has established donation, collection, sorting, repair and resale networks developed over many years by charities, social enterprises and community organisations. These systems have established infrastructure, public trust, local knowledge, skilled staff, volunteers and routes to domestic reuse. The EPR scheme should be additional to and supportive of this infrastructure.

It must not create subsidised competition for the same material streams or inadvertently transfer reusable textiles from organisations currently achieving reuse outcomes into centralised collection arrangements focused primarily on processing volumes.

Before finalising the national collection model, the comprehensive mapping of existing collection, sorting, repair, preparation-for-reuse and resale capacity should be evaluated.

The PRO should then demonstrate how its proposed collection system will strengthen and expand this capacity.

Collection should be designed around the next-best use of material, not simply maximum collection tonnage. Sorting and triage need to happen early enough to preserve value. The system should enable multiple local pathways, from direct reuse, redistribution, preparation for reuse, to remanufacturing and recycling, with reusable material protected from unnecessary contamination or premature classification as waste.

“Reuse First” access to material

Access to high-quality reusable material is fundamental to the viability of community reuse organisations. CRNI therefore considers that the EPR scheme should move beyond providing merely transparent or non-discriminatory access to collected material.

It should establish a clear “Reuse First” principle.

Textiles assessed as suitable for direct reuse or preparation for reuse should be made available first to qualified reuse operators capable of returning those products to use before they are allocated to recycling, export, energy recovery or other lower-order treatment.

This should be supported by transparent procedures, appropriate quality and traceability requirements and safeguards against cherry-picking or inappropriate diversion.

A “Reuse First” approach gives practical effect to the waste hierarchy. Without it, reuse organisations may nominally be permitted to participate in the collection system while still losing access to the quality materials required to sustain their activities.

CRNI therefore recommends that the final Delivery Plan:

- Prohibit collection arrangements that unnecessarily displace or duplicate established high-performing reuse infrastructure.
- Require mapping of existing textile collection, sorting, preparation-for-reuse, repair and reuse capacity before the PRO finalises its collection system.
- Require the collection system to identify textiles suitable for direct reuse and preparation for reuse at the earliest practicable stage.
- Establish transparent “Reuse First” access for qualified social enterprise, charitable and non-profit reuse operators to appropriate material streams before recycling or other lower-order treatment.
- Protect existing donation channels and clarify ownership and access arrangements for textiles collected through both existing and EPR-funded systems.
- Ensure that the system does not create incentives to classify reusable textiles prematurely as waste or direct them towards lower-order treatment.
- Require monitoring of the quantities and proportions of collected textiles entering direct reuse, preparation for reuse, repair, recycling, export and other treatment routes.

Procurement and contracting

The design of PRO procurement will have a major bearing on whether community-based reuse organisations can participate meaningfully in the EPR scheme.

Contracting arrangements based primarily on scale, turnover, lowest unit cost or tonnes handled could systematically favour large commercial waste-management operators even where community-based organisations deliver greater reuse and social value.

The PRO should therefore be required to adopt procurement arrangements that reflect both the waste hierarchy and wider social value.

Contracts should, where appropriate, be divided into proportionate lots and qualification criteria should be appropriate to the scale and nature of the service being procured.

Multi-year arrangements should be considered where they can provide the certainty necessary for social enterprises to invest in staff, premises and infrastructure.

Evaluation criteria should recognise reuse rate and value retention, preparation-for-reuse performance, local employment, skills development, community value, environmental outcomes and quality, employment and training outcomes, local economic value and traceability as well as price and operational capacity.

The EPR system should not simply reward the lowest cost per tonne collected or processed.

The Department should also use public procurement as a mechanism to demonstrate circular textiles practice. CRNI recommends that the State and semi-State sector establish measurable targets for the procurement, use, reuse, repair and end-of-life management of uniforms and other workwear, supported by appropriate reporting and recognition for organisations demonstrating good practice. This would provide a practical demonstration of circular procurement while reducing textile waste and creating demand for durable, repairable and reusable products.

Waste hierarchy prioritisation

The waste hierarchy must sit at the centre of the EPR scheme and have practical and enforceable consequences.

Prevention and reuse should not be treated as desirable outcomes alongside recycling. They are higher-order activities and should be prioritised accordingly.

CRNI therefore calls for the waste hierarchy to be reflected expressly in national EPR regulations, the terms of PRO Approval, investment decisions, contracting arrangements, targets and performance reporting.

Approval of the PRO should be conditional on demonstrating how its proposed operating model will achieve prevention, direct reuse and preparation for reuse before recycling.

CRNI supports the introduction of repair vouchers or consumer subsidies funded through EPR as a practical mechanism to extend product life and support the waste hierarchy, and strongly advocates for the inclusion of charity and social enterprise organisation perspectives in the development of a repair voucher scheme.

CRNI also supports the introduction of statutory reuse and preparation-for-reuse targets, supported by a transparent methodology for measurement.

Interim milestones should be established so progress can be monitored prior to longer-term

national or European targets, and separate measurable targets for different outcomes are recommended.

Targets and performance indicators should be carefully designed so that the PRO does not become incentivised primarily to maximise tonnage collected.

Relevant indicators should include quantities directly reused, quantities prepared for reuse, percentage of reusable products retained in Ireland, repair outcomes, product lifetime extension and the proportion of EPR expenditure supporting prevention and reuse. Reporting should distinguish direct reuse, redistribution, preparation for reuse, remanufacturing/upcycling, fibre recycling, export and disposal. Items as well as tonnes/kg should be considered for reuse measurement, as weight alone can incentivise bulk processing rather than retention of products in use.

Social, economic and community impact

CRNI believes the EPR scheme should also recognise the wider value generated through community-based circular activity. Social value, including employment, accredited/non-accredited skills development, pathways for people distanced from the labour market, affordable access to clothing/materials, volunteering and local economic activity should form part of the scheme's impact framework.

Where EPR expenditure supports social enterprises, the PRO should capture and report proportionate information on relevant environmental, social and economic outcomes, while keeping reporting requirements proportionate for smaller organisations with limited capacity.

This could include employment created or sustained, training opportunities, pathways for people distanced from the labour market, volunteer participation, skills development and community engagement alongside environmental indicators such as tonnes and items reused or prepared for reuse.

Reporting requirements should be proportionate and should not impose unnecessary administrative burdens on smaller operators.

CRNI is developing its own approach to measuring the environmental, social and economic impact of community-based circular organisations and would welcome opportunities to work with the Department, EPA and other stakeholders to align relevant measurement approaches.

Legal status of post-consumer textiles

There remains a lack of clarity regarding the legal status of post-consumer textiles at various points in the collection, reuse and recycling chain.

The distinction between a used product intended for reuse and a waste textile requiring preparation for reuse has significant consequences for collection, storage, transportation, processing and cross-border movement.

Any uncertainty could create unnecessary regulatory burdens or investment risks for organisations seeking to maximise reuse.

This issue should therefore be urgently resolved in parallel with, rather than following, development of the EPR scheme.

CRNI recommends that the Department establish a defined workstream to address the legal status of post-consumer textiles, taking account of relevant work at European level.

Actual reuse and preparation for reuse operators must be directly involved in this process so that legal and regulatory arrangements reflect operational realities.

A central principle should be that regulation must not inadvertently make reuse and preparation for reuse more difficult, administratively burdensome or expensive than lower-order treatment options.

Related waste stream: mattresses

CRNI calls on the Department to progress, in parallel, the work needed to establish a dedicated mattress EPR scheme, ensuring that its development is appropriately coordinated with the textiles EPR. Mattresses remain a bulky, difficult-to-process waste stream, with effective recycling rates in Ireland estimated at just 5-10% of mattresses placed on the market, well below the EU average of 14%, according to a CRNI paper submitted to the Department in 2021 to inform policy options for a mattress Extended Producer Responsibility scheme. The sector needs the same degree of policy certainty, appropriate financing and long-term investment signal that this Delivery Plan now aims to provide for textiles.

Implementation and monitoring

The measures proposed throughout this submission should be incorporated into the implementation framework for the Textiles EPR scheme through clear responsibilities, timelines, indicators and accountability mechanisms.

The implementation framework should include effective mechanisms for monitoring and auditing producer compliance, including appropriate arrangements to verify that textiles companies are meeting their EPR obligations and that data submitted within the scheme is accurate and complete. Compliance monitoring should be sufficiently robust to ensure that responsible producers cannot gain a competitive advantage through non-compliance.

CRNI recommends a commitment to periodically review relevant developments and best practice in other EU Member States as textiles EPR schemes are implemented, with lessons

incorporated into the Irish scheme where appropriate. This should include consideration of approaches to reuse, repair, eco-modulation, producer compliance, public procurement, data, targets and the participation of the social economy.

The final Delivery Plan should distinguish clearly between:

- Actions requiring legislation or regulation.
- Requirements to be included within the PRO Approval.
- Operational responsibilities of the PRO.
- Responsibilities of the Department and regulatory bodies.
- Areas requiring continued stakeholder participation.

The transition to EPR offers an important opportunity not simply to finance the management of increasing volumes of post-consumer textiles, but to redesign the system so that fewer textiles become waste in the first place and substantially more products remain in productive use.

Ireland already has a community-based reuse infrastructure capable of contributing to this objective. The EPR scheme should build on that foundation, strengthen it and enable it to grow.

Its success should ultimately be judged not by how efficiently Ireland manages textile waste, but by how effectively it prevents textiles from becoming waste at all.

In conclusion, CRNI wholeheartedly supports the development of an effective Textiles EPR scheme and is committed to working constructively with the Department, the future PRO and other stakeholders to achieve its implementation.