



This project is co-funded by the European Union and the Republic of Türkiye

Technical Assistance for Assessment of Türkiye's Potential on Transition to Circular Economy

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Textiles Extended Producer Responsibility (EPR)

Jordan Girling
Head of EPR

Activity 3.2.3. Training of Trainers on Integrated Waste Management in Line with Circular Economy
16-19 September 2024
Sakarya, Türkiye

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Head of EPR

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Who are WRAP?

WRAP (The Waste & Resources Action Programme) is an international climate action NGO that supports governments and policymakers around the world to design and implement effective policy mechanisms that tackle problematic waste. Our vision is a thriving world in which climate change is no longer a problem.

The logo for WRAP (The Waste & Resources Action Programme) features the word "wrap" in a dark blue, lowercase, sans-serif font. The letter "a" is stylized with a light blue, curved line that loops around it, resembling a recycling symbol or a continuous path.

Who are WRAP?

EPR at WRAP is led by Jordan Girling in his capacity as Head of EPR. Jordan works with international partners, governments, NGO's, charities, producers/manufacturers, and industry stakeholders to support the design of efficient and effective EPR systems. Jordan has 10+ years of EPR experience working with EPR stakeholders around the world.



Jordan Girling

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Why should we care about textile waste?

8% - 10%

of global greenhouse gas emissions come from clothing and footwear

The value lost every year due to clothing underutilisation and lack of recycling is

\$460 billion

29 million tonnes

of textile waste is generated by EU + USA

The total volume of greenhouse gas emitted from textiles production annually is

1.2 billion tonnes

Which is more than emissions from all international flights and maritime shipping combined

4th

Highest impact on environment and climate change in Europe

23 million garments

are sent to landfill or incinerated in the UK each year, which generates

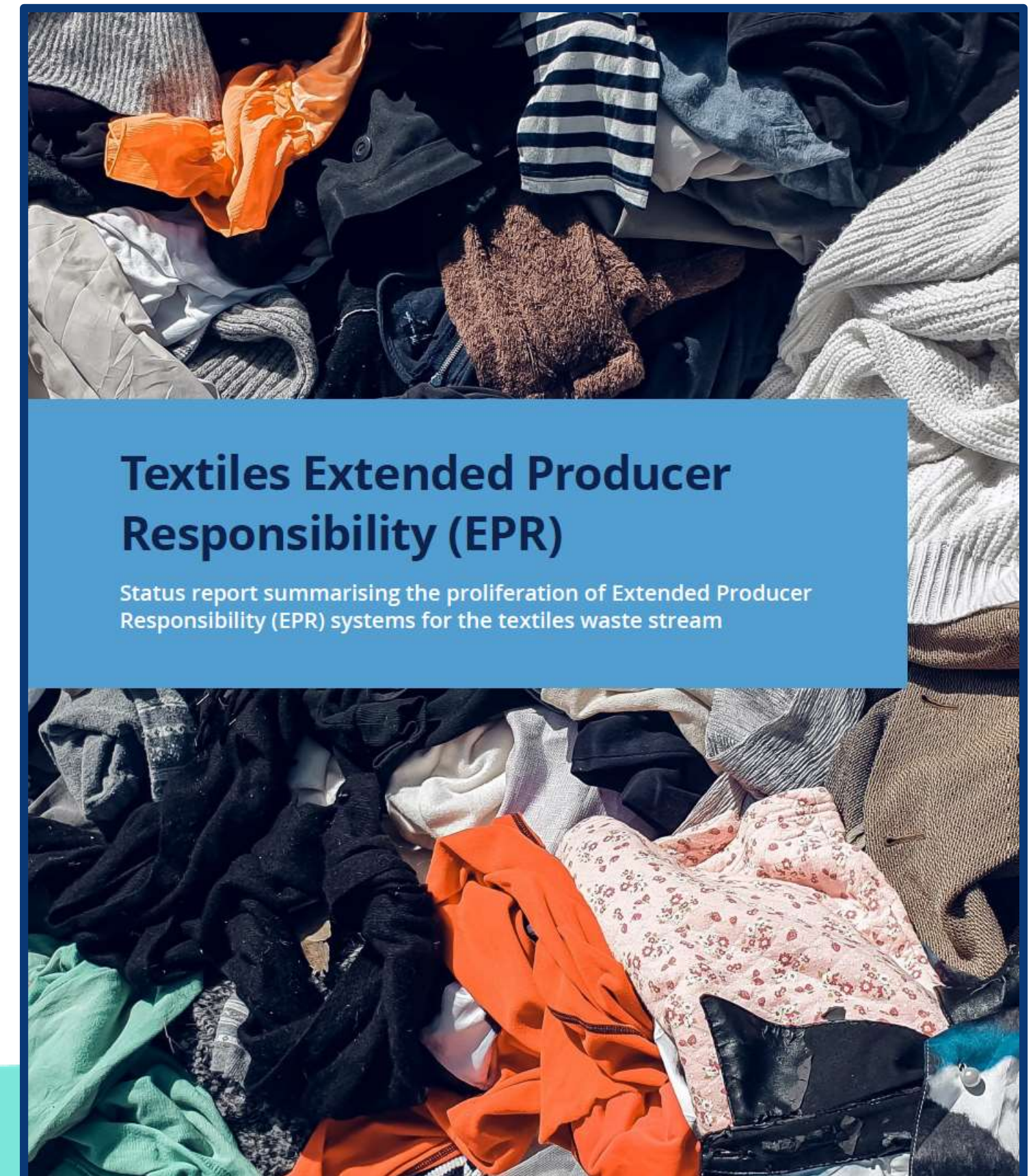
750,000 tonnes of CO₂

WRAP's relationship with Textiles EPR

WRAP lead the [Textiles 2030](#) initiative; a leading voluntary initiative to support businesses and organisations within the textiles industry to transition to more sustainable and circular practices.



WRAP published a 2024 report to summarise the [proliferation of Textiles EPR systems around the world](#).



EU Strategy for Sustainable & Circular Textiles

The [EU Strategy for Sustainable & Circular Textiles](#) was published in March 2022. In line with the Strategy, a [proposal](#) that would require the mandatory adoption of Textiles EPR systems was published in July 2023. The mandatory separate collection of textiles will apply for all producers by January 2025. Regions around the world are planning similar policy. EPR systems for textiles do not necessarily only apply to clothing, the scope can be extensive.

The scope of Textiles EPR set by the European Commission is clothing, apparel, footwear, blankets, rugs, bed linen, and curtains. The European Commission estimated an EPR fee of €0.12 per garment.



EU Strategy for Sustainable & Circular Textiles

- ❖ Producers will be required to cover the costs of managing textile waste and producers will be given incentives to reduce waste and increase the circularity of textile products.
- ❖ The European Commission's 2030 vision for textiles is that all textile products placed on the EU market are durable, repairable, and recyclable.
- ❖ The Commission will set design requirements for textiles to make them last longer, easier to repair and recycle, as well as requirements on minimum recycled content.
- ❖ The European Commission will reverse overproduction/overconsumption, discourage the destruction of unsold/returned textiles, and tackle greenwashing to raise awareness about sustainable packaging.
- ❖ Illegal exports of textile waste to countries ill-equipped to manage it will be reduced/eliminated. There will be clarification of what constitutes waste and what is considered as reusable textiles. This will stop the exports of waste disguised as exports for reuse.

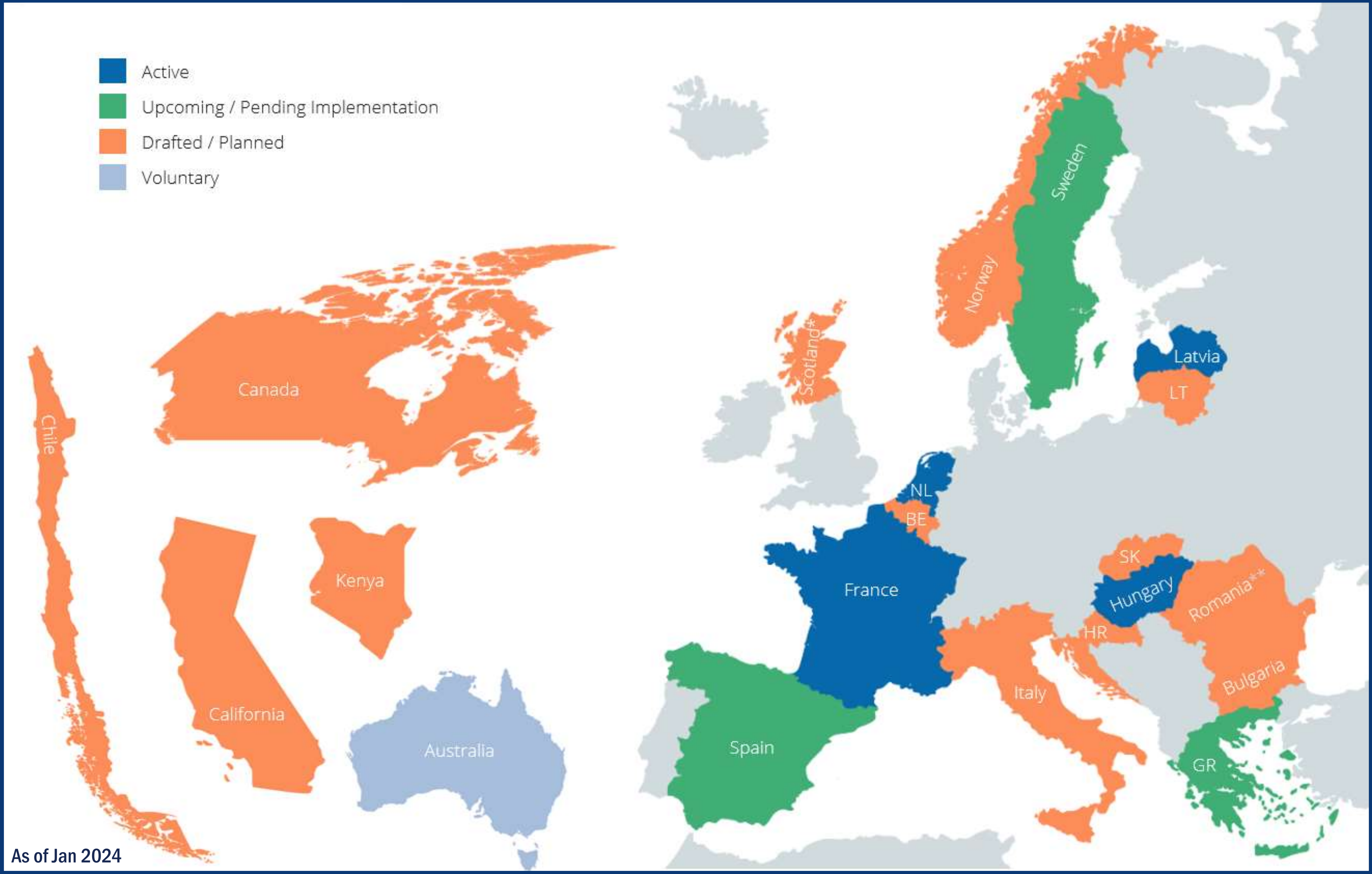


EU Strategy for Sustainable & Circular Textiles

- ❖ Online marketplaces will be obligated to register under Textiles EPR systems and obtain self-certification from producers that their products meet EPR requirements in the consumers place of residence.
- ❖ It has been proposed that microenterprises (enterprises with fewer than 10 employees or with an annual balance sheet less than €2 million) would be exempt from EPR obligation. Although, this has received push-back from industry stakeholders because microenterprises represent 88% of the market.
- ❖ Eco-modulation of EPR fees will be applied, where producers of harder-to-recycle products are charged higher fees and producers of easier-to-recycle products are charged lower fees.



Overview of Textiles EPR systems worldwide



As of Jan 2024

* Reference to Product Stewardship Plans for textiles in Scotland's Circular Economy & Waste Route Map

Overview of Textiles EPR systems worldwide

Country	Status	Scope	EPR Fee
Australia	Voluntary	Clothing	\$0.04 (€0.03) per unit
Spain	Pending	Clothing & Footwear	<i>To be confirmed</i>
California	Drafted	Clothing, Accessories, Household Textiles & Furnishings /Upholstery	<i>To be confirmed</i>
Bulgaria	Drafted	'Textiles & Footwear'	<i>To be confirmed</i>

Country	Status	Scope	EPR Fee
France	Active	Clothing, Footwear, & Household Textiles	Average: €0.01 per unit Max: €0.06 per unit
Netherlands	Active <i>(Producer obligations from 2025)</i>	Clothing, Footwear, & Household Textiles	Average: €0.01 per unit Max: €0.06 per unit
Sweden	Upcoming	Clothing, Household Textiles, & Accessories	SEK 0.23 (€0.02) per unit <i>(Expected fee for t-shirt provided as example)</i>
Hungary	Active	Clothing, Footwear, & Household Textiles, Accessories, & Carpets	HUF 145 (€0.42) per kg)

Case Study: France



Case Study: France

9 million textile items are sold in France every day.

3.3 billion textile items were placed on the market in France during 2022. This equates to

ers.

Each person in France bought on average,

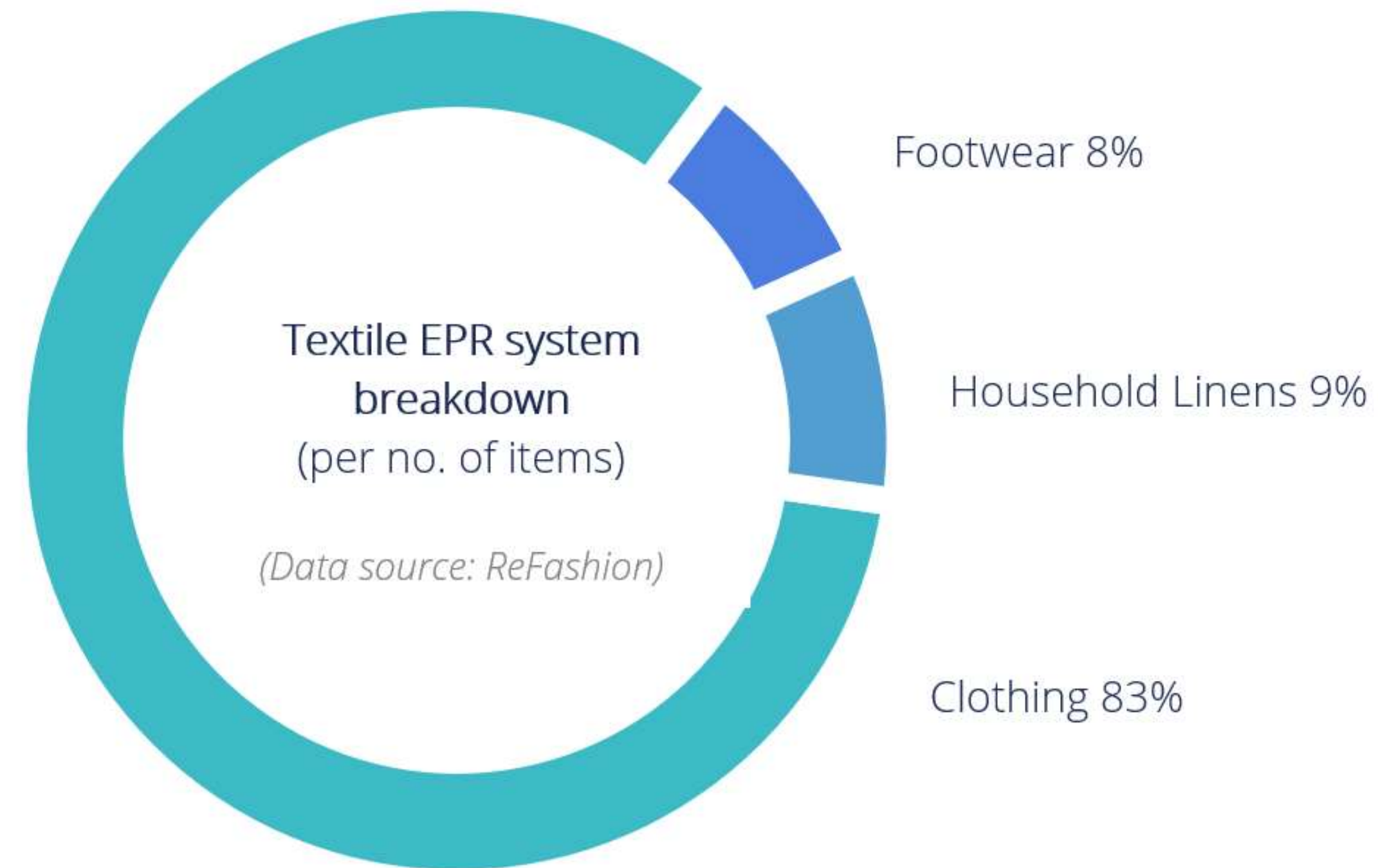
10 items of clothing, 4 pairs of shoes, and

5 items of household linen during 2022.



Case Study: France

France was the first country in the world to adopt EPR for textiles. The Textiles EPR system has been active in France since 2008. In 2008, 2.3 billion textile items were placed on the market in France; this increased to 2.8 billion by 2018 (21% increase). The Textiles EPR system in France applies to clothing, footwear, and household linens.



Case Study: France

- ❖ Collective or individual compliance is permitted. 95% of the market are registered members of the [Refashion](#) collective compliance scheme. Refashion have over 4,000 registered members and operate one textile collection point per 1,440 inhabitants of France.
- ❖ The current EPR fee is a maximum of €0.06 and an average of €0.01 per garment.
- ❖ France's Textiles EPR system has adopted the concept of eco-modulated EPR fees, where producers of harder-to-recycle and less environmentally friendly products are charged higher EPR fees and producers of easier-to-recycle and more environmentally friendly products are charged lower EPR fees.
- ❖ Producers are obligated to display the Triman Logo and accompanying Sorting Instructions on in scope textiles to inform consumers of how the textiles can be collected for recycling.



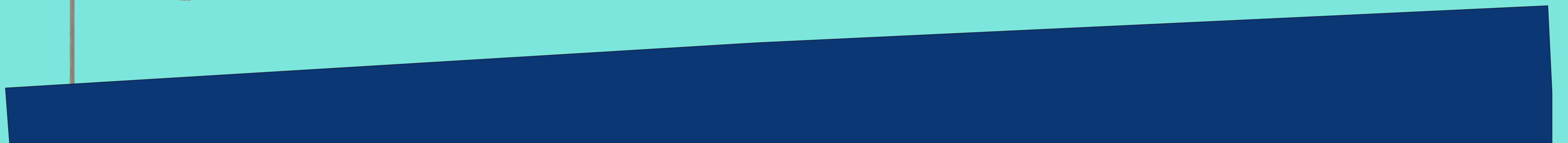
Case Study: France

Is France's Textiles EPR system successful?

- ❖ France's Textiles EPR system contributed to a threefold increase in the collection and recycling rates of consumer textiles since 2006.
- ❖ 49% of French population surveyed declared that they buy less clothes than before, compared to 38% in 2021.
- ❖ During the last 10 years, the level of EPR contributions has risen from €11 million to €25.5 million in 2019.
- ❖ Refashion have provided €5.6 million of funding for research and development in the textiles sector over the last 12 years.
- ❖ The French Ministry of Ecological Transition, which sets the directive for Refashion, has dramatically increased Refashion's budget, estimating a spend of €1 Billion across 6 years to improve collection, sorting, reuse, and recycling.



Case Study: Norway



Case Study: Norway

106,000 tonnes

of textiles were put on the market in Norway during 2022, averaging

3 kg per inhabitant.

Norway is a net importer of textiles, with less than 5% local production and in 2020, there were approximately

670,000 tonnes

of textiles in use in Norway.



Case Study: Norway

A working group for Textiles EPR was commissioned by the Norwegian Ministry of Climate & Environment in September 2022. The working group was tasked with providing a basis of knowledge that would be required for the introduction of a Textiles EPR system and to provide recommendations on how a Textiles EPR system could be designed for Norway.

❖ **Scope of Textiles EPR in Norway:** “Any product, regardless of the mixing or assembly process employed, which consists mainly of textile fibres or leather.”

This includes clothing (incl. workwear and uniforms), footwear, bags, accessories, household textiles (e.g., bed linen, towels, tablecloths, blankets, and non-attached carpets), and healthcare textiles. Products which are not mainly composed of textiles are not counted as textiles. This includes furniture, mattresses, and carpets.

❖ **Obligated companies:** Any company that brings textiles into circulation on the Norwegian market for the first time will have obligations. Foreign companies that place products on the Norwegian market via online platforms will also have obligations.

❖ **Eco-modulated EPR fees:** It was advised that environmental authorities should require PROs to develop a basic model for eco-modulation as soon as possible.





WRAP & Textiles EPR



WRAP's relationship with Textiles EPR

WRAP delivered a public 2024 webinar on Textiles EPR systems. WRAP has also spoken about Textiles EPR to various audiences and conferences during 2024.

Incl. [Drapers Sustainable Fashion](#), [PREVENT Waste Alliance](#), [California Product Stewardship Council](#), [TÜV Sustainability Summit](#), [Fashion Takes Action](#), [Municipal Waste Europe](#), [EXPRA \(Extended Producer Responsibility Alliance\)](#), [ISWA \(International Solid Waste Association\)](#), [NERC \(USA North East Recycling Council\)](#), and [RCA \(Recycling Council of Alberta\)](#)



WRAP's relationship with Textiles EPR

WRAP published a [Textiles Policy Options](#) report and a [Cost Benefit Analysis](#) to support the UK Government with the design of a national Textiles EPR system. 7 targeted policy objectives:

- ❖ Reduction of environmental impacts
- ❖ Increase of UK's recycling industry profitability
- ❖ Reduction of residual waste (landfill & incineration)
- ❖ Maximisation of domestic, social, & economic benefits
- ❖ Reporting & monitoring of impacts throughout value chain
- ❖ Increase of domestic and reduction of low-quality reuse exports
- ❖ Advancing benefits for value chain



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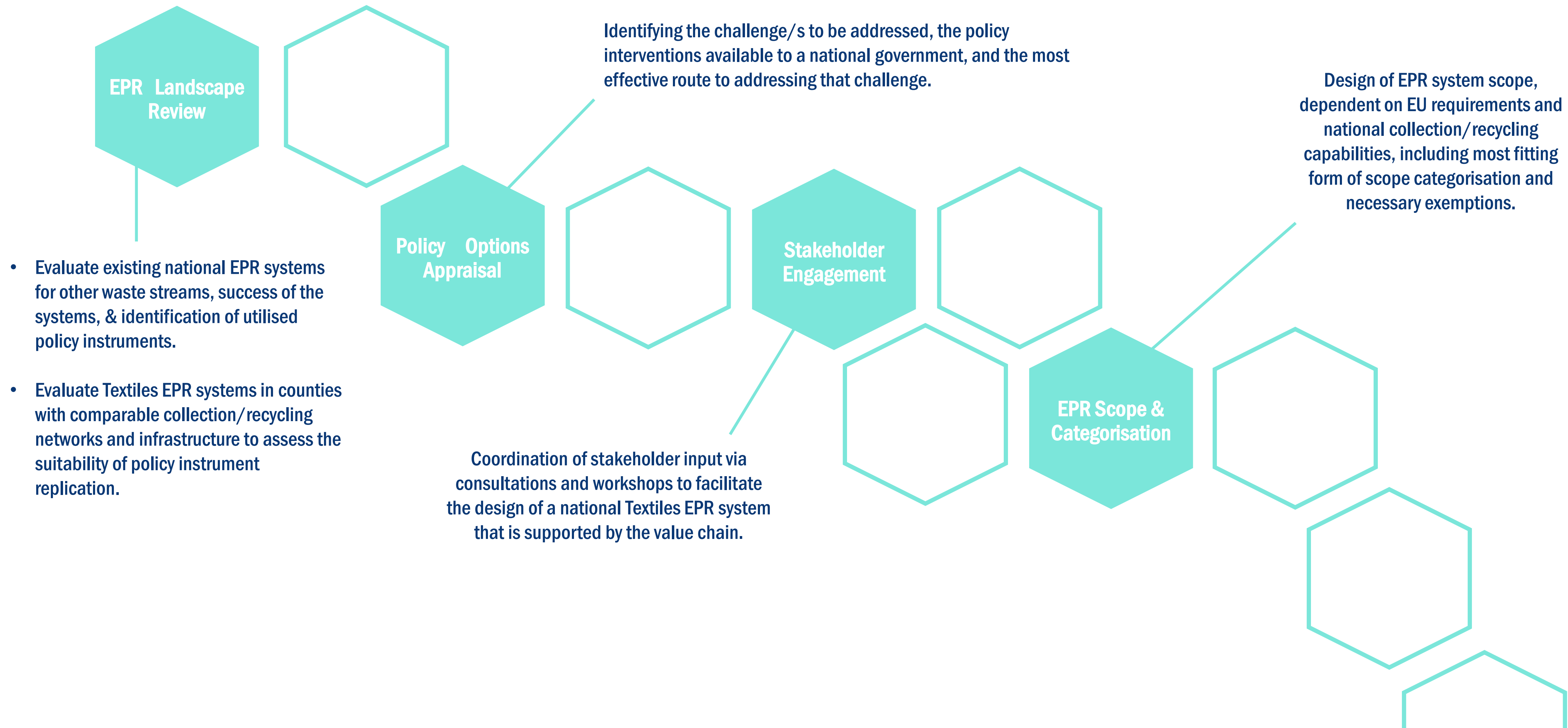


- ❖ **EPR fee (admin & support instruments):** ~£13 per tonne of textiles
- ❖ **EPR fee (used & waste textiles):** ~£349 per tonne of textiles
- ❖ **Consumer prices:** +1.8% - +2.5%
- ❖ **Textile consumption:** ~39,416 tonne reduction
- ❖ **GHG emission savings:** ~2.9 million tonnes
- ❖ **Water savings:** ~483 million m³
- ❖ **Savings to local authorities:** ~£142 million
- ❖ **Income from recycled materials:** ~£658 million
- ❖ **Recycling rate:** +12 percentage points
- ❖ **Landfill / incineration rate:** -26 percentage points

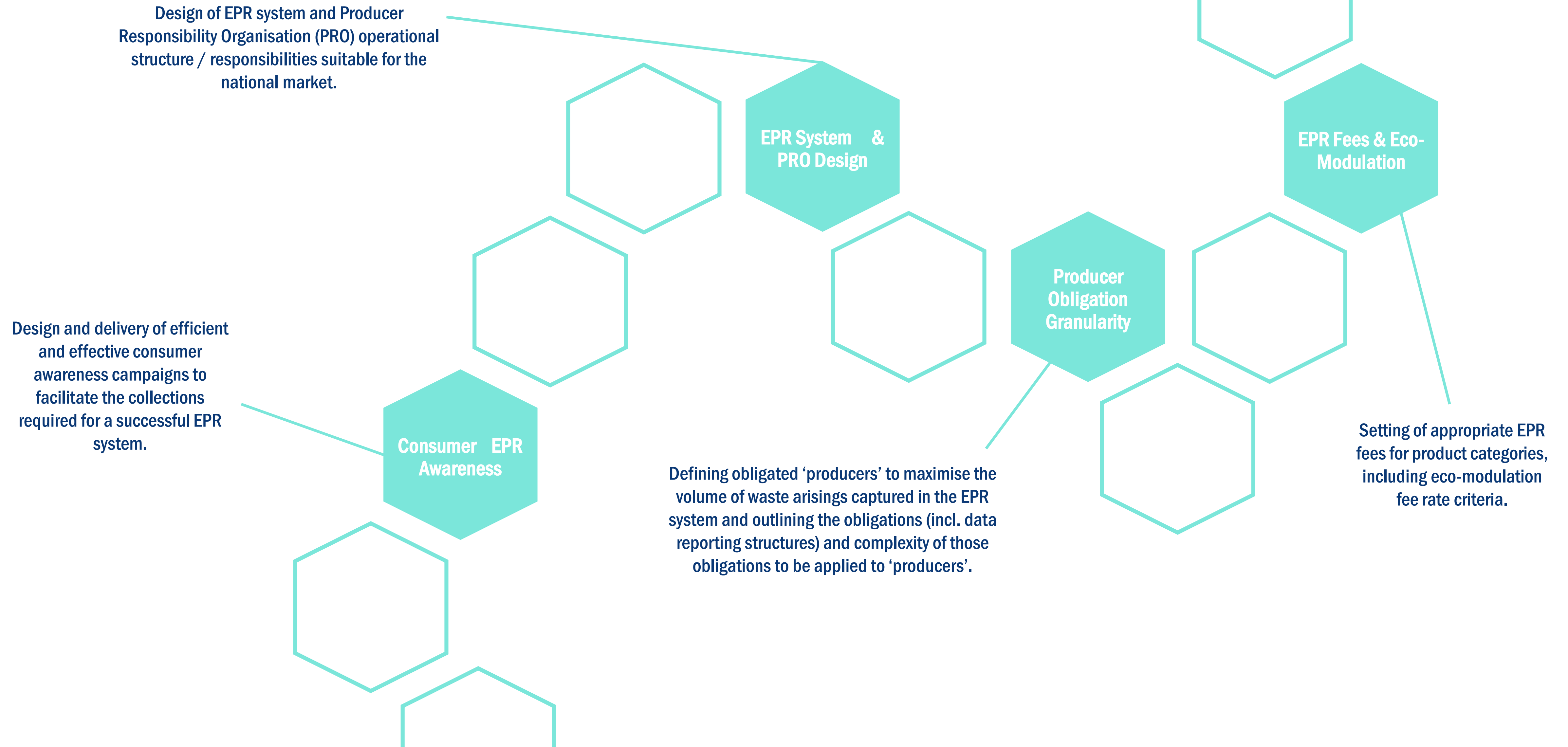


Designing, implementing, & operating Textiles EPR systems

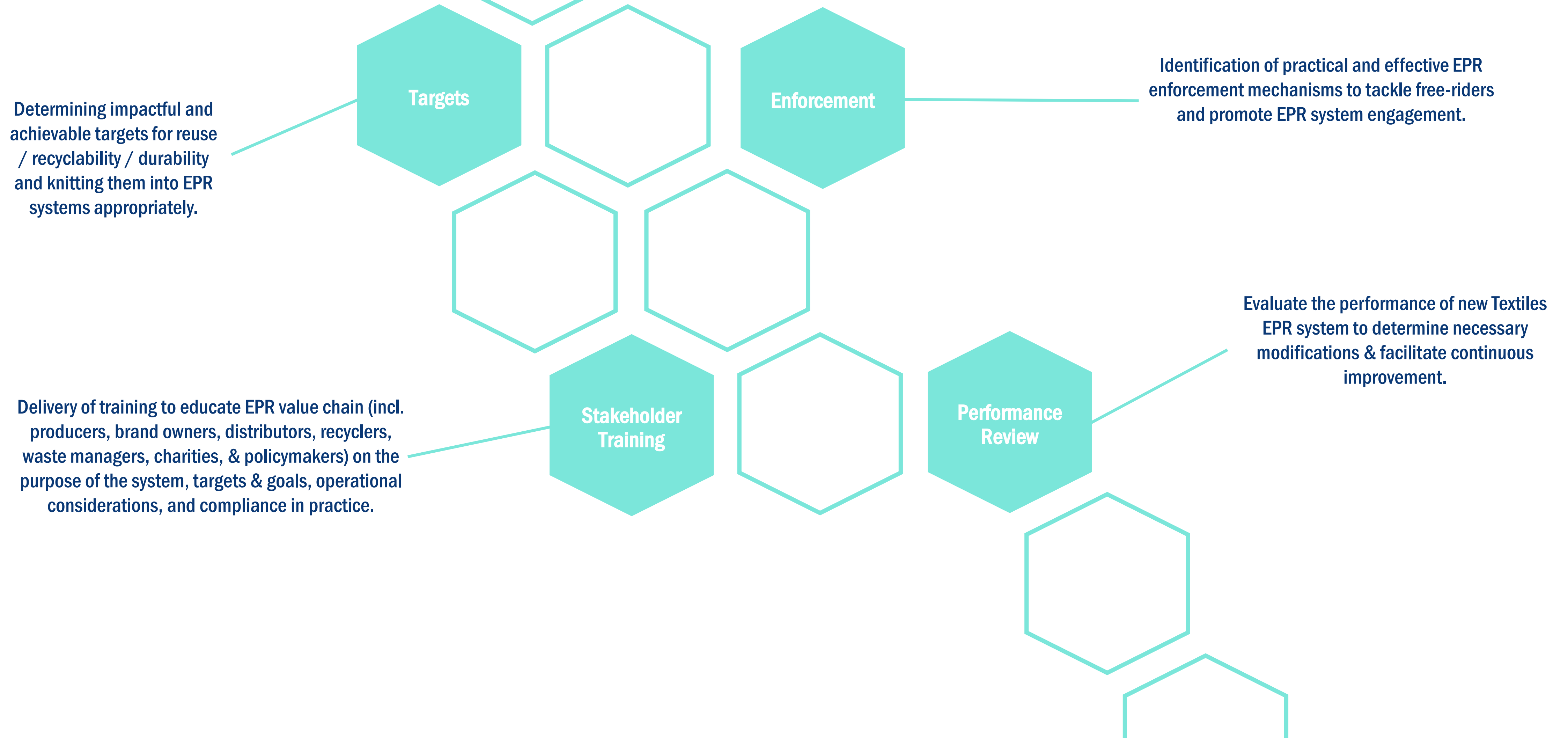
Designing, implementing, & operating Textiles EPR systems



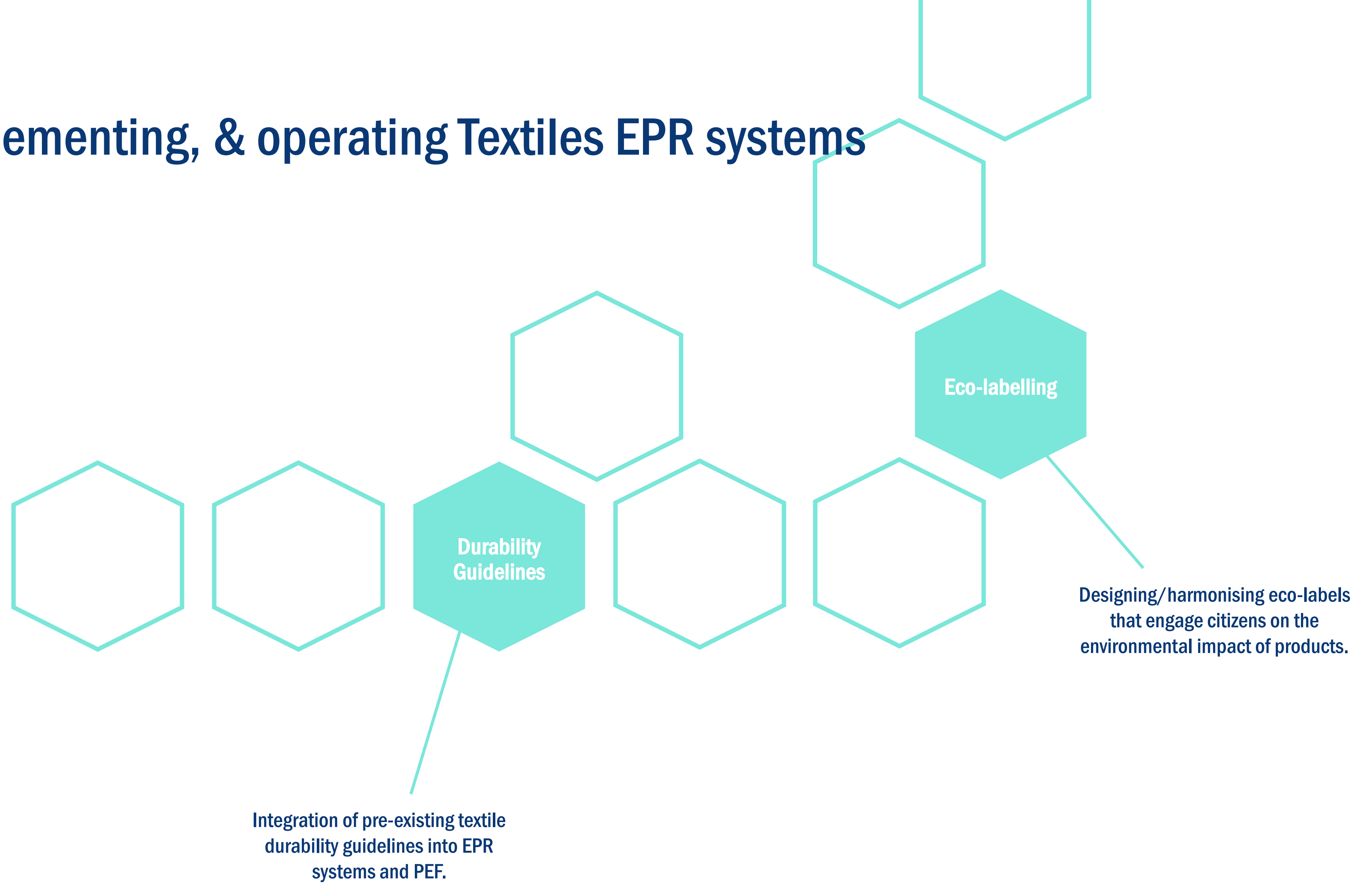
Designing, implementing, & operating Textiles EPR systems



Designing, implementing, & operating Textiles EPR systems



Designing, implementing, & operating Textiles EPR systems



Australia Case Study

Australia Case Study

Australia has a form of ‘voluntary EPR’, operated by the [Seamless](#) stewardship scheme.

In 2021, clothing textiles were placed on the Federal Minister’s Priority List for Product Stewardship, with industry required to take action to reduce clothing sent to landfill. In 2023, MP Tanya Plibersek launched Seamless and issued a clear directive that the scheme would be mandated if not taken up by enough businesses.

“I want to see industry leadership... But if I don't see enough movement in a year, then I will regulate.”



Australia Case Study

Following the Australian Government adding textiles to the Federal Minister's priority list for Product Stewardship, WRAP worked extensively with the [Australian Fashion Council](#), [Charitable Recycling Australia](#), [Queensland University of Technology](#), and [Sustainable Resource Use](#) to establish a National Stewardship Scheme for clothing in Australia.

Why was it needed?

On average per year, Australians:



Buy 56 items of clothing per person



Manufacture / import 1.4 billion pieces of clothing

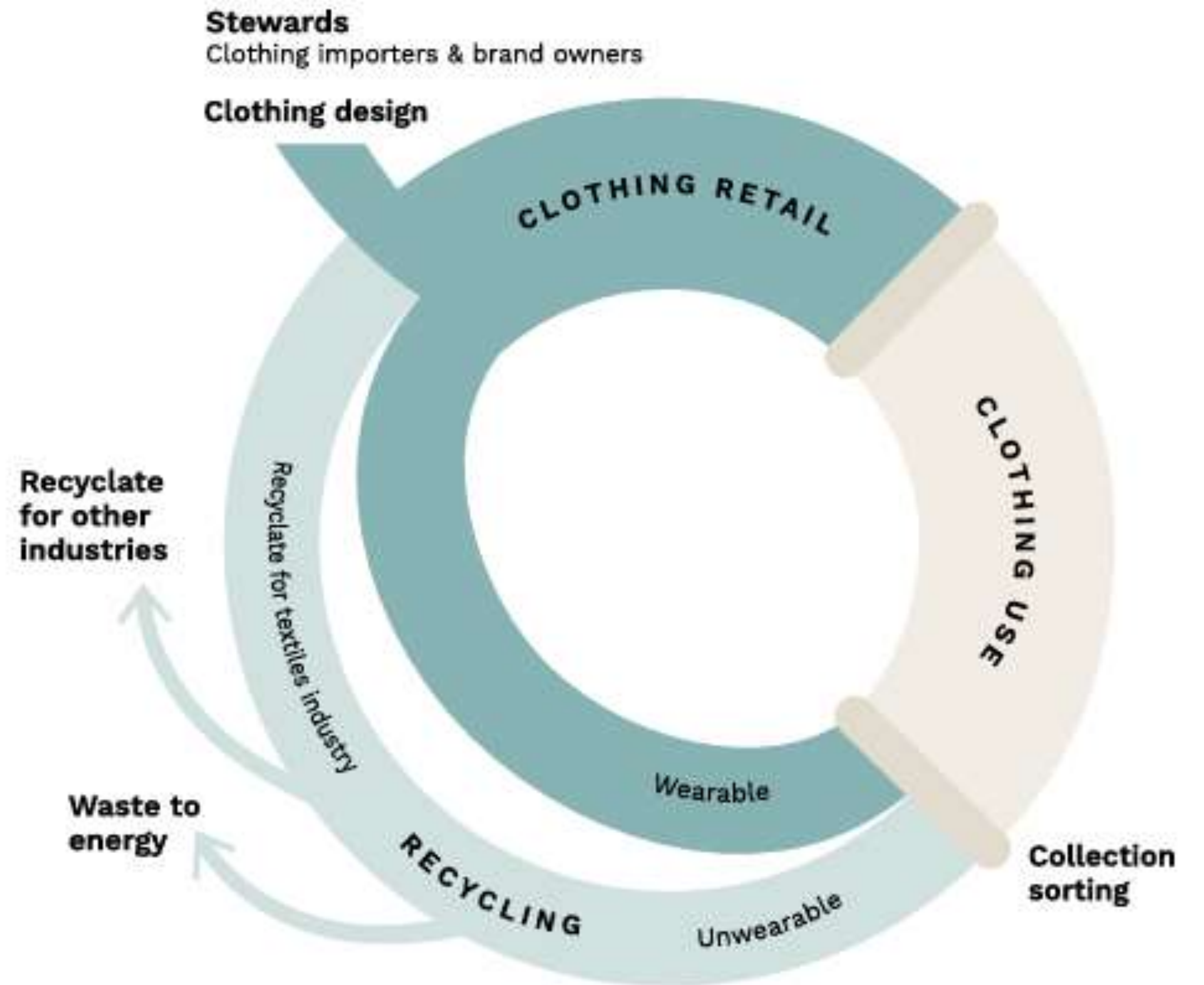


Send 200,000 tonnes of clothing to landfill each year

Australia Case Study

Seamless aims to create a circular clothing industry by 2030.

Seamless aims to have 60% of industry sign-up in order to divert 120,000 tonnes of end-of-life clothing from landfill by 2027. If 60% of the market by volume sign up to the scheme, a funding pool of \$36 million will be raised per year to transform the industry.



Australia Case Study

The design of Seamless and its circularity roadmap started in June 2023. Seamless commenced operations in July 2024.

The scheme charges a levy of **four-cent per garment** to incentivise clothing design that is more durable and recyclable, as well as funding the expansion of textiles collection, sorting, and recycling infrastructure.

'Procures' include:

- ❖ Manufactures in their own facilities / Organisations commissioning manufacture
- ❖ Organisations importing products purchased directly from distributors or brands outside of Australia

Eco-modulation of EPR fees

The recommendation is to lower ('eco-modulate') the contribution by 25%, to 3 cents, if the new clothing has attributes that meet the specified criteria.

Thank you

Upcoming WRAP EPR presentations

USA Packaging EPR
3rd December
Register here:



EU Packaging EPR (PPWR)
10th December
Register here:



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Thanks for your attention.



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