

## Editorial

# TEXTILE WASTE: WHERE IS THE JOURNEY HEADING?

In May 2018, the Waste Framework Directive (WFD) 2008/98/EC was amended by the adoption of Directive (EU) 2018/851. Amongst numerous modifications and additions, the amended WFD now also affects textiles, which have not yet been a core issue of waste management. Furthermore, textiles are also in the focus of the “European Green Deal” (EC, 2019), “a new Circular Economy Action Plan for a cleaner and more competitive Europe” (EC, 2020a) and “a New Industrial Strategy for Europe” (EC, 2020b). While it is clear that there will be massive changes in the way textile waste is handled, it is not yet foreseeable where the journey will lead.

### Textiles are part of municipal waste

Up to now textiles have not been mentioned in the WFD at all. However, the Directive (EU) 2018/851 clearly defines that textiles are part of municipal waste. However, there is no clear and unambiguous definition of what is meant by the term textiles. It is not sharp to what extent products can contain non-textile components and what purpose textile products are used for. Overlaps and ambiguities may arise. In order to achieve a level playing field in the EU and to prevent national go-it-alone, it would be important for the Commission to clearly and unambiguously define which products fall under the term “textiles” and which do not.

### Re-use

The revised WFD assigns significant importance to re-use and explicitly mentions in this context textiles as well. Even though (preparation for) reuse is very welcome in terms of resource conservation, the question arises as to how this goal can be achieved. The measure preparation for reuse was already placed second in the waste hierarchy in 2008, but this has not led to the reuse of products gaining the importance it deserves within the last decade. It is to be feared that fashion chains, which in many cases follow the fast fashion business model, will counteract reuse. For an actual reduction in the consumption of clothing, legal framework conditions would have to be created that make the fast fashion business model unattractive and enable companies that offer sustainable fashion to be economically successful.

### Separate collection

One of the core changes in the revised WFD is the obligation of a separate collection of textiles. While it is clear that a separate collection of end-of-life textiles will become mandatory from January 1, 2025 at the latest, it is not yet

defined which targets or quotas will have to be met. On the one hand, quotas could be set for preparation for reuse and recycling, as is the case for municipal waste or packaging waste. In this case, a defined minimum percentage of the clothing sold would have to be acquired by separate collection. Whereby, in addition, it has not yet been determined how high these quotas will be. On the other hand, it would be perfectly possible to stipulate that new clothing must contain a certain minimum content of recycled material. In any case, we will know more by December 31, 2024 at the latest. However, it would be necessary to announce the exact targets as soon as possible, since the member countries need appropriate preparation time for their implementation.

### Recycling

Nowadays, the costs of separate collection and sorting are borne by the sale of second-hand clothing more or less exclusively. Others than reusable end-of-life textiles will rather cause costs than contribute to the financing. As a matter of fact, collectors ask for re-useable items only. This seems to be a chicken - egg problem. Currently, textiles that would be suitable for recycling are not collected because the appropriate processes are not developed or are not economical. However, since no (or only a few) recyclable textiles are collected, no adequate systems have yet been developed to recycle such fractions. EPR (extended producer responsibility) could be a way to get out of this dilemma. Even if the current collection systems are not optimal, as they only target reusable garments, an EPR system does not necessarily only show advantages either. Nowadays, many charitable organizations are involved in the collection and sorting of end-of-life clothing. On the one hand, this leads to the creation of jobs for people who are not employable on the normal labor market. On the other hand, clothing is also offered in second-hand stores for the socially disadvantaged. Finally, it must also be taken into account that many consumers have ethical concerns about throwing functional clothing in the trash. In that, an EPR system may even be disadvantageous and could ultimately lead to clothing being given the status of a disposable product such as for packaging. All these items considered, there is a need for thorough planning and not neglecting the customers' awareness in this field.

### Recycling rate

Even if there are no targets for re-use and recycling for end-of-life textiles set up to now, the amendment of WFD

might exhibit an indirect impact. For municipal waste, stringent targets for re-use and recycling will have to be met by 2030 (60%) and 2035 (65%). These minimum quotas are not easy to achieve and member countries will have to make great efforts to actually reach the targets. Since textiles account for around 4-6% of municipal waste, they can make a significant contribution to meeting the quotas.

## Conclusions

Even though recycling in many cases shows positive effects, such as reducing the consumption of resources, it is clear that recycling in itself is not a goal. The goal is to protect the environment and minimize the consumption of resources, and recycling is only one measure to approach this goal. In practice, as with other types of waste, the right mix of preparation for reuse, recycling, thermal recovery and landfilling must be found. However, it is not the case that recycling rates should be as high as possible in order to achieve the best possible protection of the environment or maximum reduction in resource consumption. At a certain point, the effort (financial, energetic) for recycling increases to such an extent that no more benefits can be achieved with a further increase.

The new EU legislation for dealing with end-of-life clothing is to be welcomed. In part, the specifications are not yet precise and further details from the Commission will follow in the near future. It is to be hoped that the additional and further-reaching stipulations will actually lead to a significant reduction in the environmental impact of the textile industry and are not just lip service. Specifically, the Commission's action should be such as to achieve the following objectives:

- A clear definition of what is meant by the term textiles in the WFD is absolutely necessary. It is essential to avoid different interpretations within the EU27.
- Measures to encourage producers and retailers to put

fewer textiles on the market that are more durable and less subject to fashion trends must be implemented. The primary goal must be to combat the causes but not the symptoms. Ideally, alternative business models are more profitable than fast fashion.

- The charitable idea of end-of-life textiles collection should be maintained to keep the motivation of the population high, diverting textiles from municipal waste. Clothing must not be placed on the same level as packaging. Therefore, possible EPR schemes must be designed as to align with this concept.
- A collection system for end-of-life clothing that allows for collection of it regardless of its quality, must be established and funded. That is, clothing that cannot be worn again, but can be recycled, should also be collected as wide-ranging as possible.
- Local reuse instead of exporting second-hand clothing to developing countries has to be encouraged. Europe should rather not export its (waste) problems.
- Producers and retailers must not only fund collection and sorting of end-of-life textiles but also the development and establishment of recycling schemes. There must be no economic advantage in thermal recovery over the recycling of end-of-life textiles. Incineration should only be used as a last resort.

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