T(h)reading a path

Towards textiles waste prevention targets

Policy Briefing

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Contents

Context

EU Commissioner for the Environment, Oceans and Fisheries, Virginijus Sinkevičius recently stated that '*the exponential rise in the extraction of resources is the root cause of the triple planetary crisis: climate change, biodiversity loss and pollution. Most materials, together with the embedded energy and other resources used in their production, are too quickly discarded in our atmosphere, water and land*'.[1] Indeed, the EU's material footprint, *i.e.* the sum of materials from inside and outside the EU needed to produce the goods demanded by EU citizens, is above the global average and at highly unsustainable levels. Material imports to the EU increased by 17% between 2009 and 2018, showing that the EU is '*externalising the environmental impacts of European consumption beyond its borders*'.[2]

The persistence of Europe's high levels of consumption and waste generation becomes particularly apparent when looking at textile waste generation: **every year the average European consumes 26 kg of textiles and generates approximately 11 kg of textile waste**. Only half of used clothes are collected for reuse or recycling, while recycling of textiles into new clothes is approximately at 1% and many of the collection clothes end up being exported and eventually, most textiles (87%) are incinerated or landfilled.[3]

The implications for the textile industry are alarming: in the EU, textile consumption generates the fourth-highest negative impact on the environment and climate, as well as the third-highest for water and land use (taking into account the impact globally).[4] When taking a closer look at the textiles value chain, not only does the processing of textiles release hazardous chemicals into the water which harms the environment and human health, but also microfibre (fibrous microplastics) released in the use-phase and at the end-of-life is an increasing concern. Factories typically use 0.58 kg of chemical inputs for every 1 kg of fabric produced – these compounds leak into the environment at all phases of the textile lifecycle[5] and about 8% of European microplastics released into oceans are from synthetic textiles. Globally, an estimated 16-35% of all

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[1] "Circular Economy: Faster Progress Needed to Meet EU Resource-Efficiency Targets, Ensure Sustainable Use of Materials and Enhance Strategic Autonomy," European Commission, 2023, environment.ec.europa.eu/news/circular-economy-faster-progress-needed-meet-eu-resource-efficiency-targets-ensure-sustainable-use-2023-05-15_en.

[2] "Towards resource consumption within planetary boundaries. The case for binding EU material footprint reduction targets," Institute for European Environmental Policy, 2022, ieep.eu/wp-content/uploads/2022/11/Towards-resource-consumption-within-planetary-boundaries-IEEP-2022.pdf.

[3] "The Impact of Textile Production and Waste on the Environment (Infographics)," European Parliament, 2023, europarl.europa.eu/news/en/headlines/society/20201208ST093327/the-impact-of-textile-production-and-waste-on-the-environment#:~:text=Textile%20waste%20in%20landfills%20and%20low%20recycling%20rates&text=Europeans%20use%20nearly%2026%20kilos.

[4] "EU strategy for sustainable and circular textiles," European Commission, 2022, environment.ec.europa.eu/publications/textiles-strategy_en.

[5] "Press release: Textile-producing nations unite to reduce chemical waste," UN Environment Programme, 14 October 2022, unep.org/news-and-stories/press-release/textile-producing-nations-unite-reduce-chemical-waste.

microplastics originate from textiles.[6] In 2016, 64% of the fibres in global apparel were synthetic, meaning fossil fuel-based, while natural fibre production requires massive land and water use resulting in water scarcity.[7] As a result, **the main climate impact of the industry lies in the production phase** of the value chain, as shown in Figure 1.

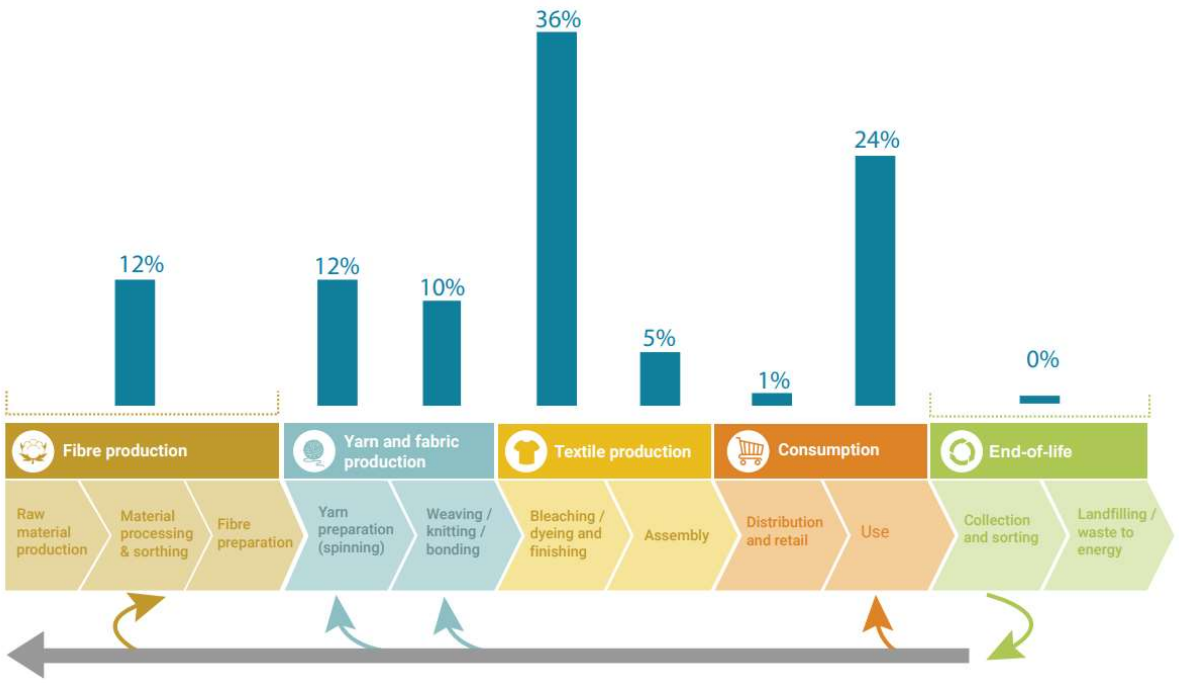

Figure 1: Climate impact across the global apparel value chain, UN Environment Programme (2020)

The World Resource Institute found that '*under business-as-usual growth projections, emissions (in the apparel sector) will grow to 1.588 Gt by 2030, well off pace to deliver the 45% absolute reduction needed across all sectors to limit warming to the Paris Agreement's goal.*' **Even with the six possible interventions modelled in Figure 2, there is still a gap of almost 40% (in comparison to emissions in 2019) of necessary emissions reductions to meet the 1.5 degrees target**.[8]

[6] "Microplastics from Textiles: Towards a Circular Economy for Textiles in Europe," European Environmental Agency, 2022, eea.europa.eu/publications/microplastics-from-textiles-towards-a#:~:text=It%20is%20possible%20to%20reduce%20or%20prevent%20the.

[7] "Sustainability and Circularity in the Textile Value Chain: Global Stocktaking," UN Environment Programme, 2020, wedocs.unep.org/20.500.11822/34184.

[8] "A Roadmap to Net-zero Emissions for the Apparel Sector," World Resource Institute, 2022, wri.org/technical-perspectives/roadmap-net-zero-emissions-apparel-sector.

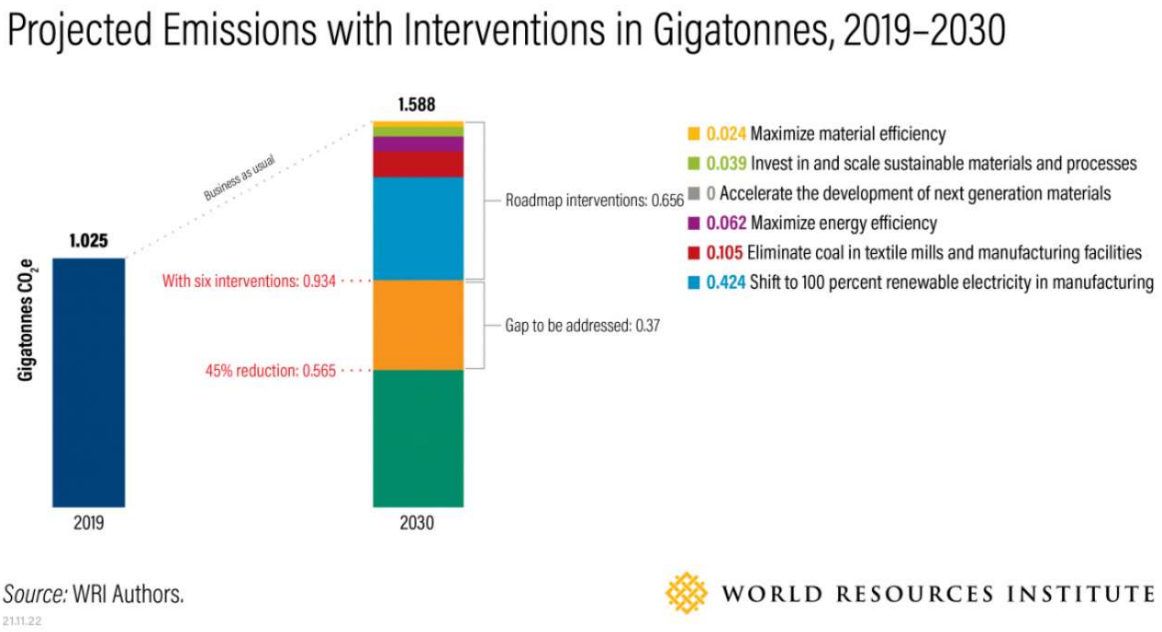

Figure 2: Projected Emissions with Interventions in Gigatonnes, 2019-2030, World Resource Institute (2022)

Given this daunting outlook, the United Nations Environmental Programme concluded that the industry needs to '*evolve from an industry producing large volumes of essentially disposable items, to one producing valuable items that remain in use for a long period*'.[9] These findings also run counter to initiatives taken by the sector that focus mainly on recycling. While more recycled material input could alleviate some of the environmental burden, fibre-to-fibre recycling of textiles is in its infancy at about 1% and even if improved, is unlikely to keep up with the high levels of new clothing production and disposal.

[9] "Sustainability and Circularity in the Textile Value Chain: Global Stocktaking," UN Environment Programme, 2020, wedocs.unep.org/20.500.11822/34184.

"Even with the foreseen interventions in the textile production chain, such as material and energy efficiency or material substitution, there is still a gap of almost 40% of necessary emissions reductions to meet the 1.5 degrees target."

Theresa Mörsen, Waste and Resources Policy Officer

The key driver of growth in the sector over the past two decades were the decreasing clothing prices - in the EU, prices decreased by 30% between 1996 and 2018 relative to inflation. This development was enabled by the increasing use of cheap, synthetic fibres from fossil fuel[10] and the relocation of production to jurisdictions with poor labour and environmental standards.[11] Low prices led to the dawn of fast-changing fashion trends[12] to '*satisfy emotional needs*' also known as *'style consumption*.'[13] Constant digital advertising and the widespread use of social media have also contributed to this trend.[14] The World Resource Institute hit the nail on the head when calling '*unchecked consumption*' the elephant in the room.[15] Indeed, the reasons for clothing disposal found that poor fit and perceived value were the reasons for discarding garments in 63% of cases, rather than the state of the garment, as found in a review of 17 studies on disposal reasons (see Figure 3). The authors concluded: '*it does not help to make clothes stronger if they are not going to be used longer anyway.*' [16]

[10] "EU strategy for sustainable and circular textiles," European Commission, 2022, environment.ec.europa.eu/publications/textiles-strategy_en.

[11] "Beyond circular fashion," Zero Waste Europe, 2023, zerowasteeurope.eu/wp-content/uploads/2023/01/Jan23-ZWE_Beyond-Circular-Fashion_-Report.pdf.

[12] Fletcher, Kate. 2014. Sustainable Fashion and Textiles. (second edition). Earthscan, London.

[13] Cho, Erin, Shipra Gupta, and Youn-Kyung Kim. 2015. "Style Consumption: Its Drivers and Role in Sustainable Apparel Consumption." International Journal of Consumer Studies 39 (6): 661–69. doi.org/10.1111/ijcs.12185.

[14] "Consumer Research for ECAP 2016-2019," WRAP, 2019, ecap.eu.com/wp-content/uploads/2019/12/Consumer-Research-for-ECAP.pdf.

[15] "Elephant in the Boardroom: Why Unchecked Consumption is Not an Option in Tomorrow's Markets," World Resource Institute, 2017, wri.org/research/elephant-boardroom-why-unchecked-consumption-not-option-tomorrows-markets.

[16] "Review of clothing disposal reasons," Clothing research, Kirsi Laitala and Ingun Grimstad Klepp, 2022, clothingresearch.oslomet.no/2022/10/19/review-of-clothing-disposal-reasons/.

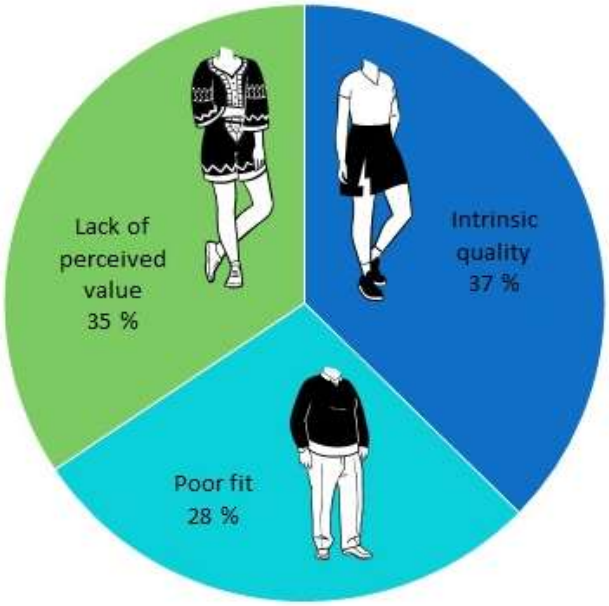

Figure 3: The main reasons for clothing disposal, Laitala and Klepp (2022)

The fashion industry's dominant business model relies on persuading consumers to continuously consume new fashion trends. European apparel companies increased the number of fashion collections per year on average from two in 2000 to five in 2011. Likewise, the shift to online shopping, home deliveries, and mounting social pressure driven by aggressive advertisement, especially targeting the younger generations via social media, intensifies this phenomenon. While the average European clothing consumption has increased by 40% between 1996 and 2012, 30% of the clothes produced every year are not even sold to consumers, underlining that **overproduction is factored into the business model**.[17] Despite increasing awareness of the problems created by fast fashion, continued high growth rates are predicted by the industry.[18] Moreover, while increased consumption clearly is a global trend, Europe remains the top customer of apparel, as shown in Figure 4.

[17] "Textiles and the environment ," European Parliament, 2022, europarl.europa.eu/RegData/etudes/BRIE/2022/729405/EPRS_BRI(2022)729405_EN.pdf.
[18] "Pulse of the Fashion Industry 2019," Global Fashion Agenda, 2019, globalfashionagenda.org/impact-initiatives/pulse-of-the-industry/.

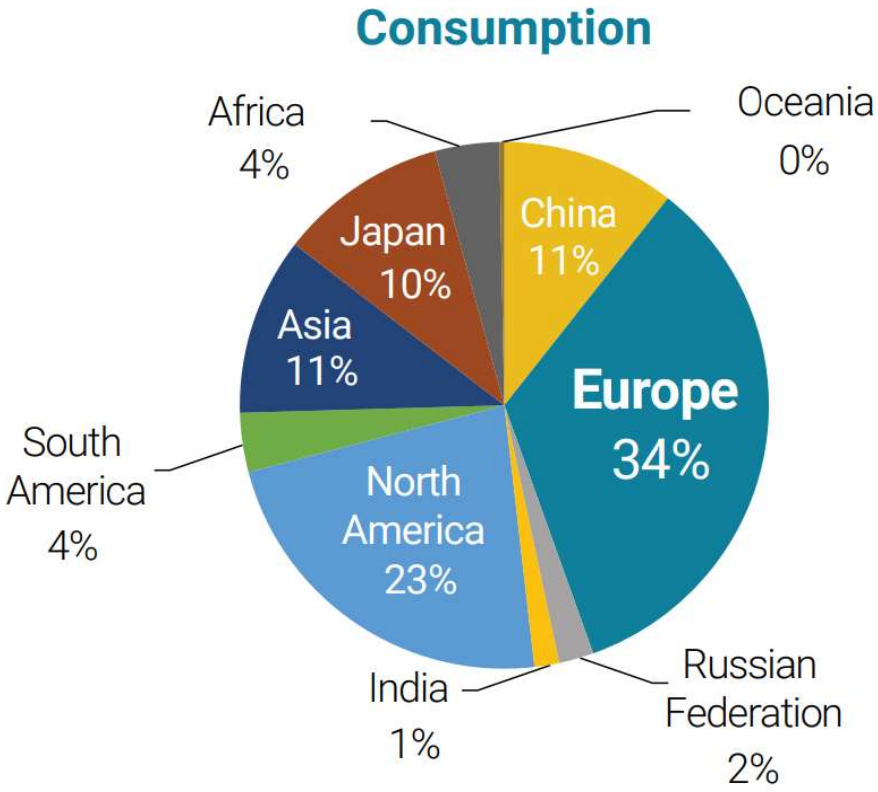

Figure 4: Textile consumption globally, UN Environment Programme (2020)

Unravelling the policy options

EU policy to rein in fast fashion is all bark, no bite

In response to the EU's high levels of material consumption and waste generation, the European Commission has put forward its Circular Economy Action Plan (CEAP) with the aim to *'advance towards keeping (...) resource consumption within planetary boundaries, and therefore strive to reduce (...) consumption footprint and double (...) circular material use rate in the coming decade.'*[19] For textiles in particular, the Commission published in 2022 the *Strategy for Sustainable and Circular Textiles* that foresees measures on design, labelling, information requirements, supply chain due diligence, Extended Producer Responsibility (EPR), and reuse.[20] Although stated as a goal of the strategy, one aspect that is reflected rather weakly in the proposed revision of the *Waste Framework Directive (WFD)*[21] is waste prevention. **This omission in the textiles strategy and the *WFD* proposal represents a misalignment with the EU's established concept of the 'waste hierarchy' that prioritises waste prevention over reuse, recycling, and recovery.**

Figure 5: The 'waste hierarchy' as defined under the Waste Framework Directive, European Commission (2022)

[19] European Commission. 2020. "A New Circular Economy Action Plan." Eur-Lex.europa.eu. March 11, 2020. eur-lex.europa.eu/legal-content/EN/TXT/?qid=1583933814386&uri=COM:2020:98:FIN.
[20] "EU strategy for sustainable and circular textiles," European Commission, 2022, environment.ec.europa.eu/publications/textiles-strategy_en.
[21] "Proposal for a Targeted Revision of the Waste Framework Directive," European Commission, 2023, environment.ec.europa.eu/publications/proposal-targeted-revision-waste-framework-directive_en.

The *WFD* as well as the *European Green Deal* define waste prevention as the main priority. It is obvious that preventing waste will ultimately also decrease resource and energy use embedded in the products.[22] **The circular economy is hence not an end in itself but a tool to lower absolute resource consumption** and, therefore, must be in tune with the waste hierarchy. Unfortunately, many circularity indicators focus on one single activity of the life cycle stage and risk '*obscuring possible burden shifting*', whereas '*an essential precondition for a sustainable [circular economy] is that resource extraction is kept within levels of regeneration and that waste and emissions are kept within limits that allow ecosystems to continuously support human societies*', as noted in the Journal of Industrial Ecology.[23]

For example, when comparing different circular activities for a pair of jeans, research found that the 'reduce' scenario results in the lowest environmental impact (measured in global warming potential (GWP)) and is preferable to reuse, recycling, or sharing.

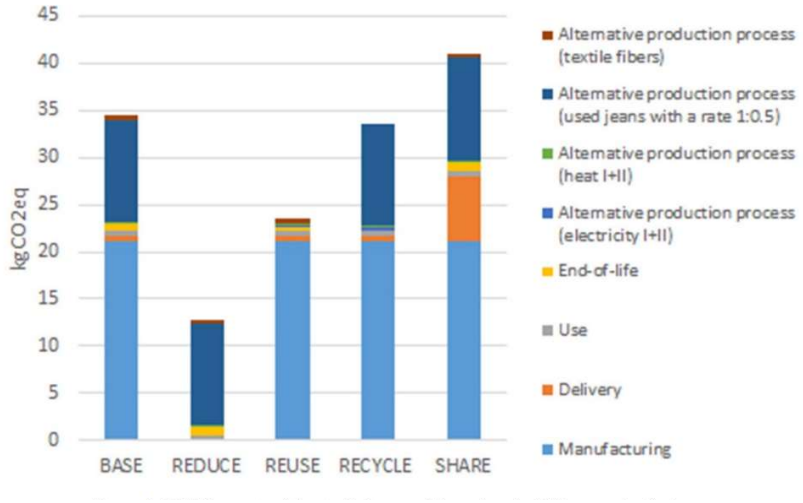

Figure 6: GWP impacts of the studied ownership and end-of-life scenario for jeans, Levänen et al. (2021)

While recycling and reuse can make a contribution to lowering impact, if the sector is to align with the goals of the Paris Agreement, these scenarios are most likely insufficient.

[22] Bartl, Andreas. 2014. "Moving from Recycling to Waste Prevention: A Review of Barriers and Enables." Waste Management & Research 32 (9_suppl): 3–18. doi.org/10.1177/0734242x1454198.

[23] Helander, Hanna, Anna Petit-Boix, Sina Leipold, and Stefan Bringezu. "How to monitor environmental pressures of a circular economy: An assessment of indicators." Journal of Industrial Ecology 23, no. 5 (2019): 1278-1291.

Circularity is silver, prevention is gold

Waste prevention is already an established concept in EU law: the *WFD*[24] defines it in article 3.12 as: '*"prevention" means measures taken before a substance, material or product has become waste, that reduce: (a) the quantity of waste, including through the re-use of products or the extension of the life span of products; (b) the adverse impacts of the generated waste on the environment and human health; or (c) the content of hazardous substances in materials and products*'. Waste prevention can hence be qualitative and quantitative. However, targets would only aim at quantitative measures, as outlined below.

The *WFD* also mandates the establishment of waste prevention programmes by Member States (articles 9 and 29) and provides examples of waste prevention measures in Annex IV, including planning, product design, awareness raising, and promotion of reuse and repair. While the directive mandates that Member States shall take measures to prevent waste generation, it does not provide any targets to measure the achievements. An analysis by the European Environmental Agency of the waste prevention programmes introduced by Member States shows that they prefer voluntary measures like encouraging reuse and repair or awareness raising over binding market-based instruments. The report concludes that '***although waste prevention programmes have been established for almost 10 years, it is difficult to prove a link between the introduction of the programmes and an effect on waste generation***.'[25] The EEA, therefore, proposes the introduction of quantitative waste prevention targets at the EU level to consolidate efforts. This would, however, also require the definition of harmonised indicators to measure achievements. So far, quantitative targets and indicators to measure textile waste prevention in particular are missing from national plans.[26] A good practice example is the Spanish waste prevention programme setting out a list of waste prevention measures (*e.g.* reduction of waste amounts, reuse/extension of life, reducing hazardousness and environmental impact), however, no specific targets are set. Luxembourg introduced quantitative and qualitative objectives and a list of measures for each type of waste, yet, indicators for monitoring are missing.[27]

[24] Directive 2008/98/EC. Consolidated text: Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives, 2018, Official Journal L 312 22.11.2008, p. 3, data.europa.eu/eli/dir/2008/98/2018-07-05.

[25] "Tracking waste prevention progress — A narrative-based waste prevention monitoring framework at the EU level," European Environmental Agency, 2023, eea.europa.eu/publications/tracking-waste-prevention-progress, p. 60.

[26] "Progress towards waste prevention in Europe — the case of textile waste prevention," European Environmental Agency, 2021, eea.europa.eu/publications/progressing-towards-waste-prevention-in.

[27] "Tracking waste prevention progress — A narrative-based waste prevention monitoring framework at the EU level," European Environmental Agency, 2023, eea.europa.eu/publications/tracking-waste-prevention-progress.

Without targets policy has little direction

The EU already introduced legally binding targets for recycling in the *WFD*, for emissions reduction in the *Fit for 55 package*, to name but a few examples. As the EEA emphasises: '*target setting is the cornerstone of policymaking in the area of waste prevention (...) Targets can drive the policy process, as they require: developing indicators for monitoring progress towards the target; indicating data requirements to measure progress; (...) evaluating the effectiveness of the entire waste prevention programme at the end of its implementation.*'[28] Indeed, waste reduction targets[29] are already foreseen for other waste streams like food waste[30] and packaging via the proposal for a *Regulation on Packaging and Packaging Waste (PPWR)*.[31] For example, in article 38 of the proposed *PPWR*, the Commission introduces a reduction target for packaging waste generated per capita, by (a) 5 % by 2030; (b) 10 % by 2035; (c) 15 % by 2040. **These precedents demonstrate the ability and legal mandate of the EU to introduce waste stream-specific reduction targets**. In addition, the European Parliament bestowed democratic legitimacy upon such measures by voting in favour of including targets for textile waste prevention in the *WFD* revision.[32]

To introduce textile waste prevention targets and indicators, the EU can draw on the work already established in the field. The EEA recently introduced an indicator framework to monitor the progress of waste prevention at the level of the EU-27 that could serve as a basis for textile-specific indicators. However, the authors note that specific data ought to be collected across EU countries in a systematic and harmonised way for successful monitoring.[33] To address the issue of waste data availability, Watson et at. propose a target for waste generation per capita per year based on either composition analysis of household waste or, in case this is not feasible, they **suggest an input-based indicator** based on the '*new textile products (by weight) put on the market per capita per year (...)* ***This indicator is considered to represent a good proxy indicator for reduction of textile wastes.***'[34] Such an input-based indicator has already been utilised in a study on behalf of the working group for an EPR scheme for textiles in Norway, set up by the Ministry of Climate and

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[28] "Progress towards waste prevention in Europe — the case of textile waste prevention," European Environmental Agency, 2021, .eea.europa.eu/publications/progressing-towards-waste-prevention-in.

[29] i The terms 'waste prevention targets' and 'waste reduction targets' are used interchangeably in this paper.

[30] "Proposal for a Targeted Revision of the Waste Framework Directive," European Commission, 2023, environment.ec.europa.eu/publications/proposal-targeted-revision-waste-framework-directive_en.

[31] "Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC", 30 November 2022, COM(2022) 677 final, European Commission, Directorate-General for Environment, eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52022PC0677.

[32] "European Parliament resolution of 1 June 2023 on an EU Strategy for Sustainable and Circular Textiles," European Parliament, 1 June 2023, europarl.europa.eu/doceo/document/TA-9-2023-0215_EN.html.

[33] "Tracking waste prevention progress — A narrative-based waste prevention monitoring framework at the EU level," European Environmental Agency, 2023, eea.europa.eu/publications/tracking-waste-prevention-progress.

[34] Watson, David, Leonidas Milios, Ioannis Bakas, Márton Herczeg, Birgitte Kjær, and Naoko Tojo. Proposals for targets and indicators for waste prevention in four waste streams. Nordic Council of Ministers, 2013, p.18.

Environment.[35] The authors considered data from placing on the market (PoM) of textiles in lieu of waste data: the study was conducted using available data on imports, exports, production of new textiles, exports of used textiles, and shares of textiles in mixed household waste, supplemented by the collection of primary data. While there are uncertainties about the quality of the available data due to the complex system with its numerous actors, this approach nonetheless represents a good example of how the necessary data for the volumes of textiles PoM could be generated. Likewise, the new Dutch EPR scheme for textiles introduces targets for recycling and reuse based on the annual reporting requirement for producers from 2024 onwards.[36]

The textile sector is a main user of virgin plastics. Synthetic fibres account for around 60% of textiles production with 70-90% of those being polyester.[37] Systemiq recently quantified the reduction of polyester necessary to achieve a high-circularity, low-emissions system and recommended reducing PET/polyester consumption by one-third. Reduction in combination with recycling and the use of recycled content could halve greenhouse gas emissions by 2040. To achieve this, they deem it necessary to engender a '*steady slowdown in polyester textile demand growth and stabilisation by 2040.*' The report modelled that by 2040, consumption of polyester in textiles could be reduced by 40% (compared to 2020) through resource efficiency and reducing overproduction.[38] Since synthetic fibres (mainly polyester) account for around 60% of material and in order to not fall into the trap of material substitution, **we propose an overall reduction target for textile waste of at least one third (33%) by 2040 in comparison to 2020 to be measured in kg per capita per year.** Substituting polyester with other fibres would result in the burden shifting and increase pressure on *e.g.* land and water use through cultivation of bio-based fibres. It is essential to set policy on the right trajectory as soon as possible while using available input-based indicators. Additional data to fine-tune the trajectory up to 2040 will soon become available via the introduction of the Digital Product Passport (DPP) and the obligation to report under existing national and future EU EPR schemes for textiles.

It remains crucial to remember that **'reuse' does not constitute 'waste prevention'**. Waste prevention is an upstream measure at the product level, as clearly indicated in the waste hierarchy. As per definition, "'*prevention' means measures taken before a substance, material or product has become waste*', yet, reuse can be conducive to this end.[39] Setting reuse targets can hence contribute to waste prevention if reuse decreases the demand for new products, however, reuse targets can never replace waste prevention targets. In some cases, facilitating reuse via resale of fast fashion textiles can in fact drive further purchasing of new garments.

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[35] "2023 Kunnskapsstatus for tekstiler og tekstilavfall i Norge," NORSUS and NORION Consult, 2023, norsus.no/publikasjon/2023-kunnskapsstatus-fortekstiler-og-tekstilavfall-i-norge/.
[36] "Infographic: extended producer responsibility for textiles," Government of the Netherlands, 2023, government.nl/documents/publications/2023/05/01/infographic-extended-producer-responsibility-for-textiles.
[37] "Beyond circular fashion," Zero Waste Europe, 2023, zerowasteeurope.eu/wp-content/uploads/2023/01/Jan23-ZWE_Beyond-Circular-Fashion_-Report.pdf.
[38] "Circular PET and Polyester A circular economy blueprint for packaging and textiles in Europe", Systemiq, 2023, systemiq.earth/wp-content/uploads/2023/07/Circular-PET-and-Polyester-Full-Report-July-2023.pdf, p. 7.
[39] "Consolidated text: Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives" 5 July 2018, European Parliament, eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:02008L0098-20180705

Major brands have already launched their own resale platforms to secure a piece of the growing resale business cake[40] but some brands offer store credits instead of cash tying resale to continued consumption.[41]

Overarching waste prevention targets give member states the flexibility to tailor measures to their national contexts. Economic incentives such as **EPR fees can play a pivotal role** in either rewarding or penalising business models that rely on fast fashion trends and place huge volumes of short-lived clothes on the market. Producers have the ability to implement upstream measures to attain resource-use reduction. Business models based on selling timeless and durable garments on demand could benefit from public funding for R&D and knowledge exchange. Governments have the power to create the necessary conditions and infrastructure for such businesses to thrive.

"Since member states' waste prevention programmes have not delivered any tangible waste reduction over the past 10 years that they have been in place, we suggest setting concrete targets, starting with textile waste in the current revision of the WFD. We propose an overall reduction target for textile waste of at least one third by 2040 in comparison to 2020, using available input-based indicators. It is essential to set policy on the right trajectory for substantial waste reduction as soon as possible"

Theresa Mörsen, Waste and Resources Policy Officer

[40] "Resale Report 2023," ThredUp, 2023, thredup.com/resale/.
[41] "Fast Fashion Brands Launching Resale Platforms: Circular or Cynical?," good on you, 2022, goodonyou.eco/fast-fashion-resale/.

Addressing common reservations

Oftentimes concerns about the socio-economic impact of waste prevention measures are brought forward to argue against ambitious targets. However, scaling circular activities to meet waste prevention targets, such as reusing, repairing or sharing clothes can contribute to the creation of new jobs. A report by RREUSE concluded that '*for a selection of re-use focussed activities, chosen due to their relevance to ongoing policy developments at EU level, the job creation figures can be represented as follows: Textile re-use: 20 – 35 jobs / 1,000 tonnes*'.[42] In addition, the Circular Economy Action Plan estimated that the **number of jobs linked to the circular economy in the EU already grew by 5% between 2012 and 2018**.[43] It must also be considered that the current textile production system with its global supply chain, diverse players, and tight margins fails to provide decent work and livelihoods for many and is in urgent need of an overhaul.[44]

The implementation of the current EU waste law is lagging[45] and the majority of Member States are at risk of missing the 2025 recycling targets for municipal waste. Yet, rather than slowing down waste legislation by postponing or lowering targets for waste management, effective **waste prevention reduces volumes and can help achieve targets for activities at the lower end of the waste hierarchy, like recycling**.

Another caveat concerning ambitious EU policy is that the EU is only one player in a complex global system and EU consumption is increasingly outpaced by emerging markets. Yet, the EU remains one of the largest consumers of apparel as shown above, and, therefore, legislation on textile waste prevention would have a global impact. Effective EU legislation has been exported to other jurisdictions before and the EU can take this opportunity to advocate for measures against textile overproduction at the international level. Finally, as the EU historically consumed high levels of natural resources, it should **lead by example** to address the triple planetary crisis.

[42] "BRIEFING JOB CREATION IN THE RE-USE SECTOR: DATA INSIGHTS FROM SOCIAL ENTERPRISES," RREUSE, 2021, .rreuse.org/wp-content/uploads/04-2021-job-creation-briefing.pdf.
[43] "Communication from the commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: A New Circular Economy Action Plan for a cleaner and more competitive Europe" 11 March 2020, COM/2020/98 final, European Commission, Directorate-General for Environment, eur-lex.europa.eu/legal-content/EN/TXT/?qid=1583933814386&uri=COM:2020:98:FIN.
[44] "Sustainability and Circularity in the Textile Value Chain: Global Stocktaking," UN Environment Programme, 2020, wedocs.unep.org/20.500.11822/34184.
[45] "Waste Early Warning Report," European Commission, 2023, environment.ec.europa.eu/publications/waste-early-warning-report_en.

Policy recommendations

As presented above, voluntary measures for waste prevention, and textile waste prevention in particular, have so far not yielded tangible results. Setting legally binding targets, similar to other circular measures like recycling, is therefore key to drive textile waste prevention and alleviate the environmental burden of, in particular, production. We therefore call on the European Commission to:

1. Introduce textile waste prevention targets during the ongoing revision of the *Waste Framework Directive*. This will encourage Member States to ensure the effectiveness of circular measures in their waste prevention plans. Alternatively, the European Commission should by the end of 2024 present to the co-legislators a legislative proposal including waste prevention targets for textiles in accordance with Article 9.9 of the *WFD*;

2. Develop a set of specific indicators for the monitoring of textile waste prevention;

3. Allocate funds from the prospective Extended Producer Responsibility (EPR) scheme to textile waste prevention measures;

4. Mandate reporting on how much textile is collected either separately or in mixed waste in a systematic and harmonised manner across the EU;

5. Produce guidance for the implementation of policy instruments that are most suitable for achieving the objectives of Article 9, *e.g.,* support for alternative business models, EPR fees and other economic incentives, or restricting fast fashion advertisements.

Zero Waste Europe is the European network of communities, local leaders, experts, and change agents working towards the elimination of waste in our society. We advocate for sustainable systems and the redesign of our relationship with resources, to accelerate a just transition towards zero waste for the benefit of people and the planet.

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