



To:

European Commission

- Head of Cabinet of Commissioner-designate for Environment and Circular Economy
- DG ENV
- DG GROW
- DG REGIO
- DG EMPL

European Union Member States' Ministers of

- Economy and Finance
- Climate and Environment
- Labour and Social Affairs

OPEN LETTER

18 November 2024

Re: Textile Emergency Action Plan (TEAP) needed quickly - Emergency funding to prevent the collapse of textile collection, sorting, reuse and recycling in the EU

Dear European Union policy makers, dear Ministers,

We are writing to raise the alarm over the future of the used textile value chain and its operators within and beyond the EU.

In less than two months, the EU will collect more textile waste than ever before as the EU-wide obligation to ensure the separate collection of textiles comes into force on 1 January 2025. Many Member States do not have functioning systems in place to fulfil this obligation. They lack infrastructure and funding for collection, local reuse, preparing for reuse and recycling. Aside from that, the used textiles market is on the brink of financial collapse, while funding based on Extended Producer Responsibility (EPR) will not be in place for at least another two to five years. Even countries with existing EPR schemes for textiles are facing an unprecedented crisis as the system still needs significant investments and improvements before it can function effectively.

Our respective members across the EU hereby call your attention to the fact that the used and waste textile sector in the EU is facing its greatest-ever crisis. The existing sector is equipped with key know-how, infrastructure, workforce and relationships with the public that they have been building for decades. This system is already under immense strain, and the upcoming crisis will further worsen the situation due to lack of funding and support. If nothing is done to prevent it, this will result in a major setback to the EU's ability to deal with its own textile waste. If existing infrastructure collapses, the future restart of the sector will cost a great deal more than preserving existing investments. That will cause serious regression rather than progress toward the EU's circular economy transition and competitiveness. Additionally, a single social enterprise creates 20 to 35 jobs for individuals at risk of social exclusion per 1,000 tonnes of textiles collected. A collapse in this sector would, therefore, have severe consequences for people, the environment, and the economy.

In the absence of appropriate and effective EPR fees to fund the collection and processing of collected post-consumer textiles by the collection deadline, we ask for an intervention that matches the gravity of the emerging crisis: the EU should provide emergency funding to protect existing facilities and operators and the future of used textile value chains.

The sector has been struggling ever since the rise of fast and ultra-fast fashion flooded the market with low-quality, fossil fuel-based pieces that are produced at unprecedented rates. Existing infrastructure has been overloaded since well before the mandatory separate collection is set to begin. Sorting plants – such as SOEX, the German leader in exporting and recycling second-hand textiles, and the largest in Europe – are going bankrupt, affected by the increasing quantities and lowering prices. Operators have nowhere to send the reusable items and cannot store them indefinitely. There are already cases of reusable and recyclable textiles being incinerated in residual waste incinerators at regular prices because they cannot be sold or stored anymore. Likewise, the EU cross-border second-hand clothing market is saturated, recycling options are inconsistent and retail sales are below all budget forecasts.

Given the gravity of the situation, we are calling for an emergency transitional funding mechanism that can ensure the sector's survival during the period between the formal beginning of separate collection and EPR being in place.

We call on the EU and national policy makers to propose a funding mechanism, for example through the existing EU tools such as the Recovery and Resilience Fund, the Just Transition Mechanism, managed by CINEA, or loans from the EIB with an obligation for Producer Responsibility Organisations to repay the loans at national level once EPR for textiles is active. Whether grants or loans are the way forward, their amount and structure should be rapidly available and adapted to the sector's needs.

In line with the waste hierarchy, this emergency funding should prioritise local and regional reuse efforts. Funding should target textile collectors and sorters with a special emphasis on social enterprises that support work integration and poverty prevention for people at risk of socio-economic exclusion and the set up and execution of collection by municipalities.

This measure is essential: to ensure and protect the EU's competitiveness and resources; and for the EU to demonstrate that it takes responsibility for its own waste as well as for the implementation of its own laws. Separate collection and treatment of post-consumer textiles is an important step away from a linear economy and toward a circular economy. The signatories do not wish to risk the continued dumping of textile waste in non-EU countries as a result of a timing issue. We are therefore calling for an immediate solution to an immediate problem. This should not lead us to forget the roots of the problem: overproduction, which needs to be addressed through strong eco-design requirements.

We are at your disposal for a meeting and look forward to your response.

Sincerely,

RREUSE
ACR+
ZWE

[RREUSE](#) is Europe's largest network of social enterprises active in reuse, repair and recycling whose 1,200 social enterprises collectively manage over 337,000 tonnes of used textiles per year. As such, they play a pivotal role in the circular economy as well as provide job and training opportunities for people distanced from the labour market or at risk of socio-economic exclusion. On average, a social enterprise in RREUSE network creates between 20 and 35 jobs per 1,000 tonnes of collected textiles.

[The Association of Cities and Regions for sustainable Resource management](#) (ACR+), has been advocating for 30 years already for decentralised authorities' crucial role regarding material resources and circular economy. The international network gathers local and regional authorities working to transition to waste-free circular systems in their territories and beyond, together with other stakeholders. Through its various activities, ACR+ provides its members with concrete tools, technical data, and innovative approaches to enact a just and sustainable transition.

[Zero Waste Europe](#) (ZWE) is the European network of communities, local leaders, experts, and change agents working towards a better use of resources and the elimination of waste in our society. We advocate for sustainable systems; for the redesign of our relationship with resources; and for a global shift towards environmental justice, accelerating a just transition towards zero waste for the benefit of people and the planet.