

Transposing textiles EPR: the EU state of play in 2025

Executive summary
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The textiles problem today

Textiles have become one of the fastest-growing and most environmentally impactful consumer goods in Europe. Globally, textile production has doubled between 2000 and 2015, while clothing use-time in the EU has dropped by almost 40% between 2000 and 2015, according to the Ellen MacArthur Foundation¹.

This can be assumed to have dropped even further as of 2025, in line with the trend of rapidly rising waste volumes. In 2022, according to the EEA², EU citizens consumed an estimated 8.5 million tonnes of textile products annually, equivalent to 19 kg per person. Furthermore, based on data from 2024³, around 16 kg of textiles are discarded per person each year. According to the European Commission⁴, only 22% of post-consumer textiles are currently collected separately in the EU for reuse and recycling, while less than 1% of material is recycled back into new clothing fibres.

Based on available data, the textile supply chain for the EU was responsible for roughly 159 million tonnes of CO₂-equivalent emissions in 2022⁵, 8% of European microplastic releases to oceans⁶ (from synthetic textiles), and extensive pressure on water and land resources globally, especially in producing countries.

Social impacts of the sector also remain acute⁷: low wages, poor working conditions, and cases of human rights infringements and child labour persist across global supply chains.

Furthermore, Europe's reuse sector and social enterprise-led collection and sorting of discarded textiles are now reaching a crisis point⁸. Sorters and second-hand operators face declining textile quality value due to the rising amounts of poor-quality fast and ultra-fast fashion, rising collection costs, and limited domestic recycling capacity. Without stable and sustainable financing, many social actors risk closure, which would negatively impact not only the reuse sector but also the many people relying on social enterprises for their employment.

¹ Ellen MacArthur Foundation (2019) [Fashion and the circular economy – deep dive](#).

² EEA (2025) [Consumption of clothing, footwear and household textiles per person](#).

³ EEA (2024) [Management of used and waste textiles in Europe's circular economy](#).

⁴ European Commission (2023) [Circular economy for textiles: taking responsibility to reduce, reuse and recycle textile waste and boosting markets for used textiles](#).

⁵ EEA (2025) [Greenhouse gas emissions from EU's textiles consumption](#).

⁶ EEA (2025) [Textiles](#).

⁷ United Nations Environment Programme (2020) [Sustainability and Circularity in the Textile Value Chain – Global Stocktaking](#).

⁸ ZWE (2024) [Open letter: Textile Emergency Action Plan needed quickly](#).

A proposed solution: EPR

The majority of issues within the textiles sector today are directly linked to overproduction and lack of regulatory policies. In this context, Extended Producer Responsibility (EPR) has emerged as a pivotal policy instrument that, if implemented alongside complementary policies, has the potential to drive circularity and put into practice the Polluter Pays Principle⁹. The revised EU Waste Framework Directive¹⁰ (WFD) obliges Member States to introduce EPR for textiles by April 2028 at the latest. As of 1 January 2025, separate collection of textiles has been mandatory, yet it has not been fully implemented.

The introduction of textile EPR systems across the EU, including the setup of Producer Responsibility Organisations (PROs) taking on the financial management, will cover the costs of separate collection, yet the long transposition period of 30 months since the law entered into force in October 2025, means significant financial insecurity for local actors that are currently responsible for ensuring the separate collection. While the increasing volumes of separately collected textiles are a step in the right direction for circularity, they also exacerbate the current crisis faced by the reuse sector, which has to handle rising volumes without extra funding available to support the collection, sorting, preparation for reuse, and repair of discarded textiles.

Once in place, EPR will shift the financial and organisational responsibility for textile waste from municipalities and social enterprises to producers. A progressive EPR could also incentivise better design for durability, reparability, recyclability, and support reuse and the use of more recycled fibres. If structured properly, EPR systems could introduce fee modulation (ecomodulation) which rewards more sustainable producers and penalises less sustainable products, aligning with the EU Circular Economy Action Plan¹¹ and the EU Strategy for Sustainable and Circular Textiles¹². However, in practice, EPR has so far not had an impact on design or consumer behaviour across other waste streams¹³. EPR is currently a policy tool primarily for waste management, while the design of textiles will be mandated in the future via the Ecodesign minimum requirements for textiles¹⁴, as outlined in the Ecodesign for Sustainable Products Regulation (ESPR) at the EU-level.

Nonetheless, implementing effective textile EPR systems is central to achieving targets for waste prevention, separate collection, (preparation for) reuse, and recycling, and to supporting a fair transition for the reuse and sorting sectors in the EU, as well as, importantly, in receiving countries outside of the EU. That said, EPR still

⁹ *i: In this context, polluter is a stand-in for producer brand.*

¹⁰ EUR-Lex (2025) [Directive \(EU\) 2025/1892 of the European Parliament and of the Council of 10 September 2025 amending Directive 2008/98/EC on waste \(Text with EEA relevance\).](#)

¹¹ EUR-Lex (2020) [A new Circular Economy Action Plan For a cleaner and more competitive Europe.](#)

¹² European Commission (2022) [EU strategy for sustainable and circular textiles.](#)

¹³ ZWE (2025) [Designing EPR to foster the EU's competitiveness and strategic autonomy.](#)

¹⁴ EUR-Lex (2024) [Regulation \(EU\) 2024/1781 of the European Parliament and of the Council of 13 June 2024 establishing a framework for the setting of eco-design requirements for sustainable products, amending Directive \(EU\) 2020/1828 and Regulation \(EU\) 2023/1542 and repealing Directive 2009/125/EC \(Text with EEA relevance\).](#)

holds the potential to be transformed into a more effective financial incentive for better design; yet, this paper outlines the status quo.

At the time of writing, many EU Member States are in the process of discussing or designing the structure of what their textile EPR system should look like. There is therefore a lot of interest in existing European EPR schemes to see what has worked and could be replicated, as well as what has not and should be avoided.

It is important that diverse stakeholders are included in the design process of a textiles EPR to ensure the creation of a system that works well for all relevant actors. Thus, including not only producers, but also meaningfully including municipalities, waste managers, collectors, sorters, social enterprises, and recyclers is paramount to creating fair and functional systems that reflect the reality of operations on the ground. Such inclusive design and governance would help increase transparency, align environmental and economic incentives, and foster more effective progress towards waste prevention, reuse, and recycling outcomes.

To assist national policymakers and others involved in the design of EPR systems, this publication presents an overview of the textiles EPR systems in the EU which are already in place or in preparation with public consultation. Our aim is to provide clear and concise information that can be assessed and used in other countries across the EU or beyond, if national EPR schemes for textiles are being discussed.

Disclaimer: This text has been prepared in September–November 2025, in the context of ever-evolving transpositions of textiles EPR across EU Member States. Therefore, by the time of reading, some of this information may be slightly out of date.



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. www.zerowasteurope.eu



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