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How to design and develop EPR for textiles in the EU?

Framework report

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Executive summary

Extended Producer Responsibility (EPR) is a central policy tool to address the environmental and economic burdens of the textile sector. This report highlights key points and strategic messages, aiming to serve as a useful guide for EU Member States embarking on the design of textile EPR schemes.

The Waste Framework Directive (after its revision by Directive (EU) 2025/1892) introduces a binding obligation for all Member States to establish textile EPR schemes. These schemes must ensure that producers assume financial responsibility, and, where appropriate, organisational responsibility, for the end-of-life management of textile and footwear products. A certain degree of harmonisation across Member States is essential to avoid market distortions, reduce administrative burdens, and ensure comparable data and performance outcomes across the EU.

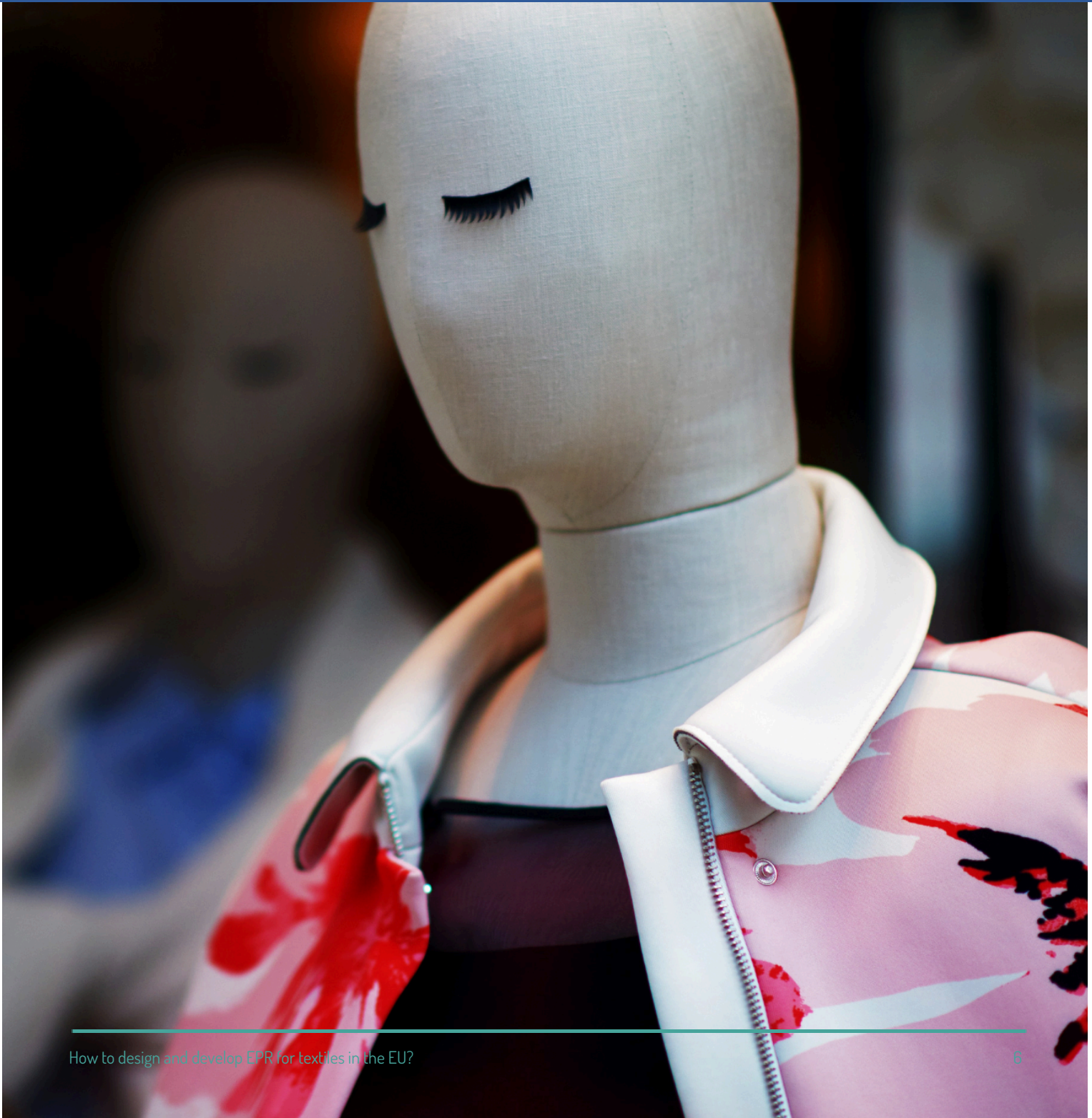
This report identifies some key priority areas for policymakers to consider in the design of textile EPR schemes:

- Define a clear product scope and stakeholder responsibilities.** Textile EPR applies to clothing, household textiles, and footwear, with flexibility for Member States to expand the scope based on national needs. This report also clarifies the roles of key actors – producers, Producer Responsibility Organisations (PROs), public authorities, waste operators, and social economy entities – stressing the need for clearly defined responsibilities, transparent governance, and effective coordination mechanisms.
- Align EPR with the waste hierarchy and circular economy objectives.** EPR schemes must prioritise prevention as well as reuse and preparation for reuse ahead of recycling and disposal. Introducing binding targets will be essential to achieve the desired outcomes. Separate collection and recycling targets are important but insufficient unless complemented by reuse and repair measures that preserve the value of products and materials. Strengthening textile reuse systems and preparation for reuse should not only be an environmental priority but also a social opportunity through job creation and skill development in the workforce.
- Ensure the critical role of social economy actors.** Social economy organisations are historically key contributors to the collection, sorting, reuse, and preparation for reuse of textiles. The report highlights the need to protect their access to collected textiles, ensure fair compensation, support their development in the field of textile recycling, and ensure their representation in the policy design phase.

- **Define cost coverage and financial transparency.** Producers must cover the full costs of textile waste management, including collection, sorting, communication, data management, monitoring, enforcement, and the management of textiles found in mixed municipal waste. Transparent financial management and fair cost allocation are essential to ensure system credibility and long-term stability.
- **Safeguard data transparency, monitoring, and enforcement.** Reliable data systems, producer registers, and reporting obligations are identified as foundational elements of textile EPR that must be prioritised in the design of EPR and ongoing implementation. The report stresses the need for strengthened enforcement of obligations at the PRO-level, including sanctions for non-compliance, controls on online sales, traceability of collected textiles, and safeguards against illegal exports.

Textiles EPR, if well-designed and robustly enforced, can be a critical policy lever for shifting waste management and prevention costs from public authorities to producers. The recommendations outlined in this report would strengthen reuse and recycling markets and reduce the volume of textiles ending up in landfills and incinerators, becoming a catalyst for EU Member States to transition towards more circular textile systems.

Introduction



Context

The revision of the Waste Framework Directive (WFD)¹ introduced Extended Producer Responsibility (EPR) as a key instrument to advance the sustainability of the textile sector and to move towards a more circular model.

In view of the obligation for Member States to establish national EPR schemes to finance and organise the collection, sorting, reuse, preparation for reuse, and recycling of textile and footwear waste, the purpose of this document is to provide guidelines to Member States in the process of defining and developing their national EPR schemes. This report presents examples and best practices from existing EPR schemes to showcase how to maximise the positive environmental (and social) outcomes of the new policy.

While developing national EPR schemes, it is important that actors bear in mind the current policy debates around the harmonisation of these systems across the EU.

Textile sector and impacts

In recent years, increasing attention has been focused on the textile sector due to its environmental impact and the need to modify current production and consumption models. Online sales, fast and ultra-fast fashion, low-cost textile products, and similar trends have made the textile sector one of the sectors with the highest environmental impact.

In 2022, European consumption of textile and footwear products reached 19 kg per person per year, amounting to 8 kg of clothing, 4 kg of footwear, and 7 kg of household textiles.² Another figure that clearly illustrates the shortcomings of the current production and consumption system is the estimate that between 4% and 9% of textile products placed on the market are destroyed without ever being used.³ In 2022, the average capture rate for textiles and shoes waste from households in the EU27 was just under 15%, and only 451,268 tonnes of textiles were reused in the EU (excluding Bulgaria and Cyprus and including Norway), corresponding to an average of 1.7 kg of textiles per person. In relation to exports, the exports of used textiles from EU countries were 1.44 million tonnes in 2025 (3.2 kg per person)⁴.

The textile sector is one of the economic sectors with the highest environmental impact. In comparison with other consumer goods, in 2022, European textile consumption caused the fifth-highest value chain pressures on land and on the use of primary raw materials, the fourth-highest water use and the fifth-highest negative impact on greenhouse gas emissions. It also contributes to other environmental impacts, such as microplastic pollution resulting from the production, use, and washing of textiles. Regarding waste generation, in 2022, the

¹ Directive (EU) 2025/1892 of the European Parliament and of the Council of 10 September 2025.

² EEA (2025), [Measuring Europe's textiles circularity – through the lenses of the EEA Circularity Metrics Lab](#).

³ EEA (2025), [Europe's environment 2025 – Knowledge for resilience, prosperity and sustainability](#).

⁴ EEA (2026) [Textiles](#).

European Union produced around 7 million tonnes of textile waste, corresponding to 16 kg per capita.⁵ Of this amount, only 15% was separately collected; the remaining 85% ended up as mixed household waste and therefore could not be reused or recycled.⁶

It should be noted that, from an economic perspective, the textile sector is one of the most important sectors in Europe, in 2023 accounting for:⁷

- The turnover of 170 billion EUR.
- 197,000 businesses.
- The direct employment of 1.3 million people.

Based on the data presented, urgent action is required to improve the sustainability of the textile sector, and in particular, to reduce the environmental impact of the large volume of textile and footwear waste generated each year. One of the tools available to address this challenge is EPR.

European legal framework

Directive 2008/98/EC on Waste introduced the concept of Extended Producer Responsibility (EPR). This concept aims to shift responsibility for end-of-life management of products from public administration to producers, taking into account the entire life cycle of the product, including proper management once it becomes waste.

Subsequently, Directive (EU) 2025/1892 of 10 September 2025 amended the Waste Framework Directive (Directive 2008/98/EC), placing particular emphasis on textile and footwear waste and establishing a mandatory and harmonised EPR framework for this sector. Some of the main requirements introduced with regard to EPR for textile and footwear products are:

- Obligation for all Member States to establish mandatory national EPR schemes for textile, textile-related and footwear products (including clothing and household textiles) and to set up a producer register.
- Application to all producers placing textile products on the EU market, including importers and non-EU online sellers.
- EPR must cover the full costs related to the collection, transport, sorting, preparing for reuse, reuse, recycling, and final disposal of used and waste textiles (as listed in Annex IVc, WFD). It should also cover the costs of activities associated with municipal waste composition studies, information campaigns, data collection and reporting, and support for R&D aimed at improving product design.

⁵ EEA (2024), [Textile waste management in Europe's circular economy](#).

⁶ EEA (2025), [Measuring Europe's textiles circularity - through the lenses of the EEA Circularity Metrics Lab](#).

⁷ EEA (2025), [Europe's environment 2025 - Knowledge for resilience, prosperity and sustainability](#).

Member States may decide whether the cost of managing the residual waste fraction should be covered in full or in part.

- Member States may require the introduction of eco-modulation of fees based on ecodesign requirements, as well as the possibility of modulation based on product lifetime.
- EPR schemes must include transparency and data reporting obligations, with harmonised requirements on operational information, data categorisation, and data presentation.
- Used textile and footwear products shall not be considered waste upon collection when they are directly handed over by the end users and directly professionally assessed as fit for reuse at the collection point by the reuse operator or social entities.
- Member States must ensure that participation by public authorities, social economy entities, or other reuse operators cannot be refused within the established scheme.
- Social economy enterprises engaged in textile collection and reuse may be exempted (in whole or in part) from data reporting obligations.
- The Directive requires the sorting of used textiles prior to export, clearly defining what constitutes waste and what is reusable, in order to limit illegal exports.

Member States have until June 2027 to transpose Directive 2025/1892 and until April 2028 to establish EPR.

In parallel, the EU Strategy for Sustainable and Circular Textiles⁸ – aligned with the commitments under the European Green Deal,⁹ the Circular Economy Action Plan,¹⁰ and the European Industrial Strategy¹¹ – addresses the challenges of textile production and consumption by analysing the entire lifecycle and proposing actions to transform current production and consumption patterns.

⁸ European Commission (2022), [EU strategy for sustainable and circular textiles](#).

⁹ European Commission (n.d.), [The European Green Deal: Striving to be the first climate-neutral continent](#).

¹⁰ European Commission (n.d.), [Circular Economy](#).

¹¹ EUR-Lex (2020), [COMMUNICATION FROM THE COMMISSION: A New Industrial Strategy for Europe](#).

Scope: types of textiles and footwear subject to EPR

Directive (EU) 2025/1892¹² includes, in its Annex, a list of textile, textile-related, and footwear products that fall within the scope of the EPR. Within this framework, each Member State may define the scope of application of the EPR scheme it establishes and, therefore, determine which categories of textile and footwear products are subject to EPR and which are excluded. Member States shall also assess the potential expansion of product categories on the basis of textile waste generation within the country. In the case of textile products such as carpets or mattresses, given their specific characteristics and the management requirements, it is advisable to establish specific EPR schemes separate from the textile EPR system. Several EPR schemes exist already for these sectors, ensuring the proper financing of waste management.¹³

Table 1: Textile products, and textile articles of apparel and clothing accessories for household use or other uses, where such products are similar in nature and composition to those for household use, that fall within the scope of article 22a¹⁴

CN CODE	DESCRIPTION
61 – all listed codes within the chapter	Articles of apparel and clothing accessories, knitted or crocheted.
62 – all listed codes within the chapter	Articles of apparel and clothing accessories, not knitted or crocheted.
6301	Blankets and travelling rugs (except 6301 10 00).
6302	Bed linen, table linen, toilet linen and kitchen linen.
6303	Curtains (including drapes) and interior blinds; curtain or bed valances.
6304	Other furnishing articles, excluding those of heading 9404.

¹² From this point onwards, this directive will be referred to as the Waste Framework Directive (WFD), and any use of the term “the Directive” shall refer to it.

¹³ France pioneered mandatory EPR for mattresses in 2013, achieving high collection and recycling rates; Belgium operates through Valumat, focusing on collection logistics and recycling infrastructure; The Netherlands implemented mattress EPR in 2021, with strong emphasis on circular economy targets.

¹⁴ Source: Annex IVc Part I. Directive 2025/1892.

CN CODE	DESCRIPTION
6309	Worn clothing and other worn articles.
6504	Hats and other headgear, plaited or made by assembling strips of any material, whether or not lined or trimmed.
6505	Hats and other headgear, knitted or crocheted, or made up from lace, felt or other textile fabric, in the piece (but not in strips), whether or not lined or trimmed; hairnets of any material, whether or not lined or trimmed.

Table 2: Footwear, and articles of apparel and clothing accessories for household use or other uses, where such products are similar in nature and composition to those for household use, whose main composition is not textile, that fall within the scope of article 22a¹⁵

CN CODE	DESCRIPTION
4203	Articles of apparel and clothing accessories, of leather or composition leather (excl. footwear and headgear and parts thereof, and goods of chapter 95, e.g. shin guards, fencing masks).
6401	Waterproof footwear with outer soles and uppers of rubber or of plastics, the uppers of which are neither fixed to the sole nor assembled by stitching, riveting, nailing, screwing, plugging or similar processes.
6402	Other footwear with outer soles and uppers of rubber or plastics.
6403	Footwear with outer soles of rubber, plastics, leather or composition leather and uppers of leather.
6404	Footwear with outer soles of rubber, plastics, leather or composition leather and uppers of textile materials.
6405	Other footwear.

It is recommended that Member States coordinate among themselves as much as possible in defining the products subject to EPR, as well as the categories to be established. This will enable harmonisation across Member States, avoid fragmentation of the Single Market and facilitate compliance for producers that place products on markets in multiple countries.

¹⁵ Source: Annex IVc Part II. Directive 2025/1892.

Box 1: EPR scope – examples from the current systems in the Netherlands and France

To date, EPR for textiles has only been implemented by a handful of Member States. Among these few, France and the Netherlands are the most established, but they follow different strategies, both for the products included and in the regulatory justification for their selection.

France established the first EU textile EPR system in 2007, managed by the PRO Refashion,¹⁶ the only operator in the country. The system is financed through fees paid by producers, generating €101.6 million in 2023 and €120.5 million in 2024. These funds cover collection, sorting, recycling, and contributions to reuse and repair.

Refashion (formerly Eco TLC) covers a broad range of products: clothing textiles, household linen, and footwear (TLC = *Textiles d'habillement, Linge de maison et Chaussures*). This includes all TLC placed on the French market for the first time (including all territories) that fall in the categories listed below.¹⁷

Refashion provides an exhaustive list of all textiles included in the French EPR system:¹⁸

Clothing:

- Top: T-shirts, shirts, pull-overs, jumpers.
- Bottom: skirts, dresses, denim trousers, everyday trousers, sport trousers and sportswear, shorts and Bermuda shorts, overalls and overalls with straps.
- Intimate: underwear, lingerie and lingerie accessories, pyjamas and other home wear/loungewear, pyjama sets and other home wear/loungewear sets, swimwear.
- Socks and hosiery. Outdoor: jackets and light jackets, waterproof clothing, coats, padded and multilayer clothing.
- Others: fabric sold by the meter for dressmaking and accessories, high visibility safety vests, factory vests, light work clothes, other work clothing, small accessories, hats and other headgear, gloves, hand muffs, mittens, medium-sized accessories, two- and three-piece suits.
- Baby: footwear, underwear, and small accessories, clothes and small items, other baby clothes.

Household linen:

- Bath linen: bath linen and mats, towels, bath linen for babies.
- Bed linen: pillow/bolster cases and protector cases, sheets, continental quilt cover, bed linen set, protective covers, blankets, bed linen for babies.
- Table linen: cleaning items and various linens, tablecloths, table linen.

¹⁶ Refashion (n.d.).

¹⁷ Refashion (n.d.), *Companies and products subject to Extended Producer Responsibility (EPR)*.

¹⁸ Refashion (2026), *refashion nomenclature 2026 en vdef.xlsx*.

- Others: fabric by the meter for making bed linen, bath linen, or table linen, gloves.

Footwear:

- Open-toed shoes: summer footwear.
- Closed shoes: flat footwear, booties, boots.
- Sneakers/trainers.
- Others: indoor footwear, baby footwear.

Refashion excludes the following products from the EPR compliance:

- Clothing made 100 % of leather or natural fur.
- Upcycled materials made entirely from second-hand materials, since their contribution was made when they were first placed on the market.
- Products intended exclusively for professional use.

In the Netherlands, the textile EPR system has been in force since July 2023. Currently, three PROs are active: Stichting UPV Textiel,¹⁹ Collectief Circulair Textiel,²⁰ and European Recycling Platform Netherlands B.V.²¹ The EPR scope covers consumer textiles, household linen, and workwear; accessories (shoes, leather belts, bags) and unsold stock are excluded.

The Decree on Extended Producer Responsibility for Textiles (*Het besluit uitgebreide producentenverantwoordelijkheid (UPV) textiel*)²², which entered into force in July 2023, has a more restricted scope than the French system and is limited to newly manufactured textile products in the categories clothing and household textiles. In the table below, there is an exhaustive list of the products that are subject to EPR, as well as products that, despite being characterised as textiles in other countries, do not fall under EPR in the Netherlands:

SUBJECT TO EPR	NOT SUBJECT TO EPR
Consumer clothing	Shoes, bags, belts
Occupational clothing	Headgear
Bed linen	Blankets, bedspreads

¹⁹ [Stichting UPV Textiel](#) (n.d.).

²⁰ [Collectief Circulair Textiel](#) (n.d.).

²¹ [European Recycling Platform Netherlands B.V](#) (n.d.).

²² Overheid.nl (2023) [Besluit van 14 april 2023, houdende regels voor uitgebreide producentenverantwoordelijkheid voor textielproducten \(Besluit uitgebreide producentenverantwoordelijkheid textiel\)](#).

Table linen	Curtains and interior blinds
Toilet and kitchen linen	Sacks and bags, tarpaulins, sails and tents, floor cloths and dishcloths, cleaning cloths, dusters
Returned products, which have been placed on the market	Unsold stock (not placed on the market)

Both systems may adjust the scope of their EPR schemes to be aligned with the WFD requirements.

Actors involved in the supply chain

This section provides a brief description of the different actors involved along the value chain of textile and footwear products, who will be affected by the implementation of an EPR scheme.

Producers

At the start of the textile and footwear value chain is the **textile industry**. This includes entities engaged in the production of clothing, fabrics, yarns, fibres, and related products. Three main types of entities can be distinguished according to the production processes they carry out, although they may perform one or more of these processes: fibre production, spinning, and weaving. Further along the chain is the **garment manufacturing industry**, which creates textile products, followed by **marketing companies and brands**.

Assuming the definition of ‘producer’, established by the Directive as the entity that places a product on the market for the first time, several actors within the value chain may be considered producers for the purposes of EPR.

At this stage of the value chain, it is worth highlighting the significant increase in online sales in recent years, whether through **platforms** that list products from different brands or through the brands’ own online sales portals – many of which are located outside the EU.

Producer Responsibility Organisations

According to the EU WFD, producers must fulfil their EPR obligations collectively²³. In this case, one or several Producer Responsibility Organisations (PROs) must be established. Their main function is to collectively manage the obligations assigned by the legislation to producers regarding the organisation and financing of the management of textile waste. These entities act as an operational and/or financial mechanism enabling producers to comply with their individual responsibilities through shared models.

The majority of PROs are private, producer-run organisations that define strategic policies and operational and financial plans. Public administrations often act as the regulator of EPR and carry out external monitoring and

²³ The revised WFD (Directive (EU) 2025/1892) introduced mandatory PRO participation for textile producers in article 22c 1.: “Member States shall ensure that producers of textile, textile-related or footwear products listed in Annex IVc entrust a producer responsibility organisation to fulfil their extended producer responsibility obligations laid down in article 22a on their behalf.”

control, without participating directly in the management. However, public–private management arrangements also exist, where the public administration is part of the PRO and participates, to a greater or lesser extent, in the system’s management decisions.

The structure of the PRO should ensure equal treatment of all participating actors, financial transparency, and the absence of conflicts of interest. Its financing is based on fees paid by producers to cover the net costs of the waste management system.

Below is an outline of the proposed tasks to be carried out by the PRO. This constitutes a general recommendation on setting up a well-functioning textiles EPR system and does not represent the regulatory obligations arising from the Directive:

- **Planning and organisation of waste management.** The PRO designs and implements the strategies necessary to ensure the collection, transport, sorting, treatment, recycling, and recovery of waste derived from the products of its affiliated producers. This includes contracting authorised operators and coordinating with local authorities.
- **Achievement of environmental and regulatory targets.** Where targets are established, such as separate collection, (preparation for) reuse, and/or recycling targets, the PRO is responsible for ensuring that these are met. It should also promote continuous improvement through performance indicators and the adoption of more efficient technologies.
- **System monitoring, ensuring traceability, and data reporting.** The PRO should maintain robust information systems to record material flows, verify treated quantities, monitor the performance of operators, and issue periodic reports to the authorities. This monitoring is essential to demonstrate legal compliance and prevent non-compliance.
- **Setting of producer fees.** Producer fees must cover the net costs of the system.
- **Awareness-raising and support for producers.** This includes awareness campaigns targeting consumers, operators, and public authorities, as well as the provision of technical assistance to producers regarding their legal obligations. PROs should also promote research, innovation, and continuous system improvement.
- **System coordination role.** The PRO acts as the coordinating body of the system and is responsible for liaising with and coordinating the different actors involved (producers, public authorities, waste management operators, etc.). As such, it should foster multi-stakeholder cooperation and ensure that the system is efficient, transparent, and economically sustainable.

Public administration

At the public administration level, responsibilities for EPR are often distributed among different tiers of the government.

The national government is generally responsible for defining and developing overall strategies for waste prevention, management, and the circular economy, as well as for national plans and programmes. With regards to EPR, the national government is often responsible for regulatory development and for regulating the establishment and operation of PROs.

Regional authorities may have the power to draw up strategies, plans, and programmes at the regional level and, depending on the country, may also have responsibilities related to the authorisation of PROs and the monitoring and supervision of the established schemes.

In general, **local authorities** are responsible for the collection, transport, and treatment of municipal waste (including textiles and footwear), either directly or indirectly through the contracting of public or private waste management companies. In some cases, management of textile waste is outsourced to social enterprises or private companies.

Social enterprises and waste management operators

Social economy entities play a key role in the collection, repair, and reuse of textiles today. They focus on social inclusion and creating a positive environmental impact, and, without EPR in place, carry a significant part of the financial burden of managing discarded textiles. In many countries, these social enterprises have been the main actors responsible for the collection of textile waste and have promoted reuse and preparation for reuse. These entities have the infrastructure and expertise needed, and their participation is key to the implementation of future EPR schemes. However, the details of this participation will largely depend on the regulatory framework established and the governance arrangements and support mechanisms created within the EPR system. The EU WFD therefore mandates that social economy entities, including local social enterprises, must be involved in the implementation of EPR schemes.

At the final stage of the value chain are **waste management operators**. Different types of waste management entities can be distinguished according to the activities they carry out, and a single entity may perform several of these activities:

- Entities responsible for the collection and transport of textile waste, generally on behalf of local authorities or social enterprises.
- Waste management operators (or social enterprises) carrying out sorting operations to enable waste to be reused or recycled.
- Waste management operators carrying out recycling operations (mechanical or chemical recycling) with the aim of obtaining secondary raw materials.
- Residual operators managing reject streams destined for incineration or controlled landfilling.

- Dealers (natural or legal persons) acting on their own behalf in the purchase and subsequent sale of waste, including those who do not take physical possession of the waste.
- Brokers (natural or legal persons) who arrange the recovery or disposal of waste on behalf of third parties, including those who do not take physical possession of the waste.

Consumers

Consumers purchase textile and footwear products, both new and second-hand, for personal or professional use. Their role is central at the collection stage, where their cooperation in separate collection schemes is paramount. They also play a role at the prevention stage through actions such as buying fewer new textiles, donating, buying or selling used items, exchanging, and repairing, among others. A system that facilitates circular behaviours can positively impact the overall sustainability of the textile system.

Principles, objectives, and obligations across all stages of the product life cycle

Design

In theory, EPR covers all stages of the life cycle of textile and footwear products, including the design phase, since product design plays a crucial role in subsequent stages, particularly in end-of-life management. It is at this stage that various features can be incorporated into the product that may affect later phases, such as durability or recyclability, thereby influencing the overall performance of the circular system.

With regard to the initial design phase, the WFD refers to the **Ecodesign Regulation**,²⁴ as this Regulation provides the legal basis for the adoption of delegated acts that will lay down ecodesign requirements applicable to specific product groups, including textile products (which constitute one of the priority product streams). The Directive itself does not establish specific obligations or targets for product design, such as recycled content, durability, or reparability. However, when defining national EPR schemes, Member States should take the future delegated act for textile products into account to ensure consistency with the requirements laid down therein.

In addition to the ecodesign requirements, product sustainability at the design stage may be incentivised through **eco-modulation of EPR fees**. The WFD refers to an upcoming Implementing Act (article 22a) in which the Commission shall adopt fee modulation criteria. It also leaves open the possibility for Member States to require that the financial contributions to EPR be modulated

“on the basis of producers’ practices, concerning textile, textile-related and footwear products listed in Annex IVc, based on the product life span resulting from such practices, the length of the useful life of those products beyond the first user, and the contribution to closing the loop of those products, by turning waste textiles into raw materials for new production chains” (article 22c).

Eco-modulation introduced under national EPR schemes should provide incentives beyond the minimum ecodesign requirements set by the related regulation.

²⁴ Regulation (EU) 2024/1781 of the European Parliament and of the Council of 13 June 2024 establishing a framework for setting ecodesign requirements for sustainable products, amending Directive (EU) 2020/1828 and Regulation (EU) 2023/1542 and repealing Directive 2009/125/EC.

In line with what is already provided for in Directive (EU) 2025/1892 (article 22b), it is recommended that part of EPR funding be allocated to research, development and innovation activities aimed at generating knowledge in the field of ecodesign and facilitating its integration into production processes.

Consumption and prevention

At the consumption stage, the WFD establishes that, with regard to the information to be provided by producers and EPR schemes to end users, Member States must ensure that consumers are actively provided with information on responsible consumption, the environmental and social impacts of textile production, reuse and repair options, the location of collection points, and the important role they play as end users in waste prevention and separate collection.

Prevention is the top priority in the waste hierarchy and, as such, it must be prioritised within EPR schemes. For this reason, textile EPR schemes should be aligned with the waste hierarchy and prioritise measures that lead to waste prevention. It should be noted that, to date, EPR as a tool for promoting prevention (for other waste streams) has delivered limited results, and its effect on production, consumption, and waste generation has been modest.²⁵

There is a close relationship between **prevention and consumption**: any action affecting consumption patterns has a direct impact on waste generation. Responsible consumption by consumers is an important factor in prevention; however, prevention must not focus solely on consumers. A much larger share of efforts should be directed towards actions producers can take to prevent waste from being generated, such as producing clothes that are designed for durability, as well as avoiding overproduction and harmful marketing practices, as this is where direct impact can be had.

To influence consumption and prevention, examples of actions that could be integrated into EPR schemes, in addition to providing information to consumers, include:

- Allocating a specific PRO budget for waste prevention campaigns.
- Establishing specific reuse and prevention targets at the national level to be achieved by PROs.
- As an alternative to specific targets for reuse, a dedicated fund for the transition to circularity can allocate budget to reuse and repair operators; an example already exists in France.²⁶
- Promoting second-hand products and/or spaces where products can be donated.
- Implementing measures to regulate or discourage fast fashion practices.

Where the establishment of **prevention targets** within EPR schemes is considered, it is necessary to ensure the availability of robust and reliable data on textile and footwear products placed on the market, as well as on textile and footwear waste generated within the market of the EPR scheme. This data enables the assessment

²⁵ ZWE (2025), *Measuring up. First edition of ZWE's municipal manual for circular textile systems*.

²⁶ See Box 2 on the French reuse and repair fund.

of compliance with the set targets. In many cases, obtaining such data will require defining a standard methodology for its collection and analysis.

Collection

With regard to collection, the WFD provides that Member States must ensure that the competent organisations under EPR establish a **free-of-charge system for the separate collection** of used textile and footwear products and of waste from those products. This system must cover the whole territory of the Member State. The collection must take into account the population size and density, the expected volume of used and waste textile, textile-related and footwear products, and the accessibility and proximity to end-users, without being limited to areas where the collection and subsequent management of those products is profitable. The system must maintain a sustained and technically feasible increase in the separate collection. In addition, local public authorities, as well as social economy entities or other reuse operators, must be able to participate in this system.

Article 22 of Directive (EU) 2025/1892 specifies that *“used textile, textile-related and footwear products that are directly handed over by end users and directly professionally assessed as fit for re-use at the collection point by the re-use operator or social economy entities shall not be considered to be waste upon collection”*.

The system must ensure that

“the collection, loading and unloading, transportation and storage infrastructure as well as other operations including handling of used and waste textiles, and subsequent sorting and treatment processes, receive protection from adverse weather conditions and potential sources of contamination in order to prevent damage and cross-contamination of the collected used and waste textiles. Separately collected used and waste textiles shall be subject to a professional screening at the separate collection point or the sorting facility to identify and remove non-target items or materials or substances that are potential sources of contamination” (article 22d).

The collection system to be implemented must **cover the whole territory** of the Member State, as required by the Directive, and the authorities responsible for drafting the legislation governing EPR must ensure that collection is sufficient and effective, regardless of the characteristics of the waste stream and of the territory. EPR systems must ensure fair accessibility across the whole territory of a state, and they cannot be limited to areas where collection and subsequent management are economically profitable.

In order to harmonise practices and ensure that all collection operators participating in the system comply with the minimum standards, it is recommended that the legislation governing EPR establish **minimum requirements for collection conditions** (including transport and storage). Previous Zero Waste Europe

reports highlight the best practices for collection that municipalities should follow to deliver high performance from an economic and environmental angle.²⁷

Furthermore, taking the diversity of textile and footwear products and the different sources of generation into account, such legislation should not be restricted to the implementation and financing of a single collection system, but should allow for the **coexistence of different collection systems** (for example, bring-bank/container collection and door-to-door collection). This will ensure that the scheme is capable of providing the most appropriate response to the different realities of this waste stream and of evolving over time in order to improve separate collection rates, specifically collection rates of reusable textiles.

Although the WFD leaves open the possibility of defining collection targets based on an assessment to be carried out by the European Commission at the end of 2029, at present, it does not establish quantitative separate collection targets, nor does it impose an obligation on Member States to define them. However, in order to encourage PROs to increase levels of separate collection of textile waste, Member States should establish quantitative targets for separate collection within their EPR schemes (see Box 3).

What the Directive does require is that the established collection systems ensure **continuous improvement in separate collection levels**. To this end, EPR schemes should ensure that sufficient resources are provided to guarantee compliance with any separate collection targets that may be established. Some examples of actions that could be undertaken include increasing the provision of collection containers, implementing continuous awareness-raising campaigns, and improving collection systems, among others.

In addition to the available collection infrastructure, one of the key factors influencing separate collection levels is end-user awareness. For this reason, EPR schemes should finance **information and awareness-raising campaigns** to promote separate collection. It is important that such campaigns be continuous over time, not limited to the initial implementation of the collection system or to changes in the system, and that information be provided to citizens on the results achieved.

Reuse and preparation for reuse

This section addresses activities related to **reuse and preparation for reuse** and their relationship with EPR schemes. It is important that, in line with the waste hierarchy established by the Directive, EPR schemes incorporate reuse and preparation for reuse as key pillars of the system.

Additionally, it is important to distinguish between local reuse within the same territory through donations or second-hand shops, and waste prepared for reuse and exported to third countries²⁸.

²⁷ ZWE (2025), *Measuring up. First edition of ZWE's municipal manual for circular textile systems*.

²⁸ The exported materials are considered waste, so it would be a preparation for reuse activity.

In order to promote repair and reuse, one option is to allocate **a set part of the PRO budget to reuse and repair activities via a fund** (see Box 2). Such funding could, for example, support existing reuse structures, provide financial support to reuse organisations, carry out awareness-raising actions targeting citizens, or implement system improvements aimed at enhancing product quality and increasing reuse rates. A system of repair vouchers, which would encourage repair practices by reimbursing part of the costs, is also an option.

Another option is to introduce **binding reuse targets** to be achieved by PROs, which means that PROs will have to allocate the necessary budget to achieve those measures. The WFD does not set **specific reuse targets** nor impose an obligation on Member States to define them. Nevertheless, the definition of targets would help improve and strengthen these practices and ensure that EPR schemes allocate resources to their promotion and provide financial support for activities aimed at extending product lifetimes. Several EU Member States and regions have introduced such targets (see Box 3). Ambitious targets for reuse bring positive environmental, social, and economic benefits.

As noted above, where reuse targets are defined, it is necessary to ensure the availability of robust data on these practices. If such data are not available, a common methodology for data collection, calculation, and analysis should first be defined across the entire territory. In addition, it would be advisable for this methodology to be as harmonised as possible between Member States. In this sense, it is necessary to bear in mind the Commission implementing decision (EU) 2021/19 of 18 December 2020 laying down a common methodology and a format for reporting on reuse in accordance with Directive 2008/98/EC. Where targets are not initially defined due to the lack of data, a deadline should be established for their future definition.

The WFD includes **preparation for reuse** among the activities whose costs must be covered by producers, including those carried out by social economy entities. It also includes the collection, transport, and sorting of textile and footwear waste with a view to their possible preparation for reuse, and states that sorting shall aim to ensure treatment in accordance with the waste hierarchy, prioritising sorting and local reuse.

As with prevention and collection, the Directive does not define quantitative targets to be achieved, although the European Commission may establish them following its assessment of the impact of the Directive on the textile and footwear waste stream at the end of 2029. **During the period leading up to this review, Member States should take action to obtain data on the quantities of waste destined for preparation for reuse, as there is currently a significant lack of data in this area.**

For EPR schemes to comply with the waste hierarchy, the implementing legislation should clearly establish that **preparation for reuse takes precedence over recycling**. To this end, producers should ensure that the collection system guarantees that textile and footwear waste for which preparation for reuse is feasible is not diverted to recycling. In addition, they should finance preparation for reuse activities and support existing initiatives that carry out this practice.

One way to promote preparation for reuse within EPR schemes is to define **specific preparation for reuse targets**, decoupled from possible recycling targets, so that the achievement of one objective does not

undermine the other. In this way, they would not be constrained by, nor compete with, other targets, since defining a single target covering preparation for reuse and recycling would imply that any increase in preparation for reuse would result in a reduction in the level of recycling achieved.

Although the Directive already states that reuse should be the main objective of sorting operations, it would be advisable for the legislation implementing EPR schemes to reinforce this obligation for waste management operators, with a focus on reuse through preparation for reuse and, as a priority, local reuse. In addition, it should establish the obligation for EPR schemes to **invest in research and innovation** to develop new techniques or improve existing ones, with a view to enhancing sorting processes and increasing the potential for preparation for reuse.

To increase the volume of products reused, EPR schemes could establish mechanisms to collect products suitable for preparation for reuse at points complementary to those already included in the collection system, such as recycling centres, retail outlets, or reuse centres.

Regarding exports, it must be noted that exported products intended for reuse are classified as waste and fall under the Waste Shipment Regulation, unless they fulfil the prior sorting of article 22 of the WFD (the output of sorting and subsequent recovery operations destined for re-use meet the criteria for ceasing to be considered as waste, as referred to in article 6). Therefore, they must be considered within preparation for reuse activities. As opposed to local reuse, exports entail an environmental impact associated with transport. Moreover, depending on the exporting and importing countries, product traceability is limited, and there is no guarantee that the final management of the product will be carried out in an environmentally sound manner, nor that the product reaches a certain quality threshold.

In addition, Member States must ensure

“that these shipments are appropriately protected against damage during transportation, loading and unloading, in particular, through sufficient packaging and appropriate stacking of the load, thereby maintaining the integrity and quality of the textiles for re-use throughout the transport process”
(article 22d).

Box 2: The French reuse and repair fund

The French Repair Fund (*Le Fonds Réparation*)²⁹ and Reuse Fund (*Le Fonds Réemploi-Réutilisation*) are pioneering financial mechanisms designed to encourage consumers to reuse and repair their products instead of discarding them. Established under the Anti-Waste for a Circular Economy (AGEC) law,³⁰

²⁹ Legifrance (2020), [Paragraphe 1 : Fonds dédié au financement de la réparation \(Articles R541-146 à R541-152\) - Légifrance](#).

³⁰ Legifrance (2020), [LOI n° 2020-105 du 10 février 2020 relative à la lutte contre le gaspillage et à l'économie circulaire \(1\)](#).

within the framework of Order of 23 November 2022,³¹ they are financed through France's EPR schemes.

The core of the fund is the repair bonus (*bonus réparation*):³² a consumer discount applied directly by certified repairers. Refashion, the PRO that manages the French EPR sector for textiles, clothing, and footwear, launched its specific Repair Bonus on November 7, 2023. The bonus amounts are fixed and vary by repair type, for example: €7 for mending a hole or tear, €14 for replacing a zip longer than 20 cm, or €25 for repairing the sole of leather shoes. This discount is deducted from the final bill, with the repairer then reimbursed by Refashion within 15 days. The fund has a budget of €154 million for the 2023-2028 period.³³

A key aspect of the scheme is the mandatory display obligation for distributors. Since July 1, 2024, Decree No. 2024-1234³⁴ requires any distributor subject to EPR for textiles, household linen, and footwear to inform customers about the Repair Fund's existence. This information must be displayed clearly in physical stores and on digital platforms, with non-compliance resulting in potential fines.

Refashion manages the network of qualified repairers, which, by the end of 2023, included 728 points across France (58 % for clothing, 40 % for footwear). In its first year, the bonus supported the repair of over 106,000 products, demonstrating significant early success in shifting consumer habits and extending product lifespans. This model serves as a key reference for other EU Member States looking to implement similar reuse and repair promotion measures to further the effective reduction of waste.

Next to the Repair Fund, the French textiles EPR system also established a dedicated Reuse Fund (Fonds Réemploi-Réutilisation), created by article 62 of the AGEC law,³⁵ and specified on the Order of 23 November 2022.³⁶ This fund is also managed by Refashion.

This fund is structured around two complementary financial mechanisms:

1. The reuse-recycling fund,³⁷ which is reserved for actors in the Social and Solidarity Economy (SEE). It corresponds to a minimum of 5% Refashion annual eco-contributions.
2. Complementary action funding, which is open to a wider target beyond SSE structures, and it

³¹ Legifrance (2022), [Arrêté du 23 novembre 2022 portant cahiers des charges des éco-organismes et des systèmes individuels de la filière à responsabilité élargie du producteur des textiles, chaussures et linge de maison \(TLC\)](#).

³² Ministères de la Transition écologique, de l'Aménagement du territoire, des Transports, de la Ville et du Logement (2023), [Le bonus réparation, qu'est-ce que c'est ?](#).

³³ Refashion (n.d.), [Bonus Réparation](#).

³⁴ Legifrance (2024), [Décret n° 2024-123 du 20 février 2024 relatif aux fonds dédiés au financement de la réparation des produits relevant du principe de responsabilité élargie du producteur](#).

³⁵ Ministères de la Transition écologique, de l'Aménagement du territoire, des Transports, de la Ville et du Logement (2020), [La loi anti-gaspillage pour une économie circulaire](#).

³⁶ Legifrance (2022), [Arrêté du 23 novembre 2022 portant cahiers des charges des éco-organismes et des systèmes individuels de la filière à responsabilité élargie du producteur des textiles, chaussures et linge de maison \(TLC\)](#).

³⁷ Refashion (n.d.), [Le Fonds Réemploi Réutilisation](#).

operates through annual Call for Projects launched by Refashion.

Recycling

The **recycling stage**, as well as recovery and disposal, is clearly included among the activities to be financially covered by producers. Although the Directive does not specify the type of recycling (mechanical or chemical) to be applied to textile waste, nor does it define guidelines on how such recycling should be carried out, it does establish that producers must prioritise fibre-to-fibre recycling.

When defining EPR schemes, for example, with regard to the setting of targets or the definition of guidelines on how recycling should be carried out, the existing recycling industry should be taken into account. This consideration should not constitute an obstacle to defining obligations for the various actors within the EPR scheme, as EPR is precisely intended to foster the development of a recycling industry capable of ensuring the availability of recycled raw materials within the European market. This may be provided through the obligation for producers to financially support research and innovation actions aimed at technological developments that improve recycling processes. Improvements in the automation of sorting processes and sorting by product composition are key factors in achieving optimal separation and recycling of mixed materials, thereby facilitating high-quality **fibre-to-fibre recycling**.

The establishment of recycling targets can drive **development and investment** in recycling infrastructure, a sector currently struggling in Europe. It could also stimulate ecodesign for recycling, since producers could be collectively incentivised to design products in a way that facilitates recycling. In this regard, Member States should review the available data to take informed decisions on the introduction of recycling targets. The Directive provides that, given the lack of robust data for all EU Member States on textile waste, the Commission should review the Directive by December 2029 to assess the establishment of recycling targets. However, Member States can and should move ahead and introduce such targets tailored to their national context and support local recycling capacity.

It is advisable that this **recycling industry be local**, allowing for the material loop to be closed within Europe, thereby reducing unnecessary transport and ensuring traceability and high environmental standards for treatment operations. This measure could also support EU-based production of recycled yarn.

For the recycling stage to succeed and be scaled at the pace needed, operators must be able to access large volumes of materials.³⁸ This requires **robust sorting infrastructure**. EPR schemes must, therefore, ensure financial support and coverage in order to meet this requirement. However, it is crucial that recycling is supported only after reuse, and only for textiles deemed non-reusable.

³⁸ ZWE (2025), [Transposing textiles EPR: the EU state of play in 2025](#).

Furthermore, it will be necessary to take into account the **end-of-waste criteria** for textile recycling currently being developed by the European Commission, so that any recycling recommendations defined are in line with those requirements.

At this final stage of the cycle, it should be noted that EPR schemes should not only focus on the separate collection stream but also address the management of **textile waste that is not separately collected and ends up in mixed waste**. The Directive leaves it to Member States to decide whether EPR should cover the costs (in full or in part) of textile waste collected together with mixed municipal waste. It is important that, when defining the legislation governing EPR schemes, Member States include financial obligations for producers related to sorting, possible recycling, and subsequent final disposal of textile and footwear waste not separately collected.

Box 3: Targets in EPR schemes – examples from France and the Netherlands

Among the few Member States that have already implemented textiles EPR, the specific objectives differ:

France

Key objectives and targets in France are carried out by the PRO Refashion, which is the only textile PRO operating in the French market.³⁹

OBJECTIVE	TARGET
Collection rate	60 % by 2028
Reuse	120,000 tonnes by 2024; local reuse (within 1,500 km): 8 % by 2024, 15% by 2027
Repair	35 % increase by 2028 compared to 2019
Recycling for collected volumes not reused	70 % by 2024; 80 % by 2027
Recycling for garments with > 90 % synthetic composition	50 % by 2025; 90 % by 2028
Disposal (landfill or incineration)	< 0.5 % of collected volumes

³⁹ Ministères de la Transition écologique, de l'Aménagement du territoire, des Transports, de la Ville et du Logement (2017), *Produits textiles (TLC)*.

The Netherlands

The Dutch system follows a different strategy, implementing weight-specific quantitative targets (expressed as a % of total placed in market) for 2025 and 2030.⁴⁰

OBJECTIVE	2025 TARGET	2030 TARGET
Preparation for reuse + recycling	50 %	75 %
Based on the volume defined in the target above	20% is prepared for reuse, and 30% is either recycled or prepared for reuse;	25 % is prepared for reuse, and 50% is either recycled or prepared for reuse;
Reuse within The Netherlands	10 %	15 %
Fibre-to-fibre recycling (of recycled share)	25 %	33 %

⁴⁰ Circulaire Economie en Afval (n.d.) [FAQ EPR for textiles. English](#).

General organisation

Single PRO vs multiple PROs

The WFD establishes that producers should fulfil their obligations collectively through Producer Responsibility Organisations (PROs), which assume these responsibilities on their behalf. In addition, the Directive encourages Member States to consider authorising multiple PROs, as competition among them may, in principle, generate greater benefits for consumers, stimulate innovation, reduce costs, improve separate collection of textiles, and increase the range of options available to producers seeking to contract with such organisations. (See article 22c).

In line with the WFD, it is advisable that national legislation allows and facilitates the establishment of multiple PROs, if this has worked well in the past for other EPR schemes in the country. However, the performance of the system depends very much on the national regulatory context, and a single PRO may deliver better results in some jurisdictions.

An advantage of the presence of multiple PROs is the reduced likelihood of dominant positions, in which a single organisation could effectively determine the rules of the system, prioritising the interests of producers over the overall performance of the EPR scheme. A lack of competition, combined with the current scarcity of reliable data on waste management costs in the sector, may place public authorities and waste management operators at a disadvantage when negotiating agreements with a single national PRO. This situation could lead to public authorities or operators incurring costs that should not fall upon them or receiving financial compensation below the actual cost of waste management. For this reason, legislation should ensure effective competition among PROs, thereby incentivising innovation and improving operational efficiency. It should be taken into account that one of the disadvantages of a multi-PRO system is the risk that competition among PROs may be reduced to a mere competition to attract producers, a so-called race to the bottom, which could negatively affect service provision by undermining waste management service quality or territorial coverage. Therefore, strong monitoring by national governments and enforcement are the most important aspects to consider, no matter if the system is built around multiple PROs or a single one.

Conversely, a single system subject to appropriate public oversight may in some cases be more efficient than several competing schemes, particularly with regard to investment in new infrastructure. A single EPR scheme would be able to guarantee feedstock supply to new facilities, increasing the confidence of potential investors in new facilities.⁴¹ Moreover, the presence of multiple schemes would require additional administrative resources for monitoring and supervision by the competent authorities. A single PRO could provide a one-stop

⁴¹ Eunomia (2022), [Driving a Circular Economy for Textiles through EPR](#).

shop for data reporting and registration, acting as a focal point for the wider stakeholder chain; and, if done well, simplify the entire process. It may also be easier for public authorities to regulate a single PRO.

For this reason, where multiple PROs are authorised, it would be advisable for national legislation to establish the obligation to create a coordination office in which all authorised PROs participate (see section on [Inclusive governance and coordination entities](#)). Such a body would facilitate the work of public authorities by providing a single point of contact. The potential participation of other actors in this coordination body, such as public authorities or waste management operators, could be evaluated by each Member State in accordance with its institutional and regulatory framework. It is highly advisable for actors across the value chain – especially at the local level – to have a voice in the establishment of EPR schemes and in the design of PRO governance.

Furthermore, in order to facilitate monitoring by public authorities, it would be advisable for the legislation to regulate how PROs report operational and financial data. Establishing harmonised reporting formats would help ensure the availability of consistent and comparable information across the different schemes, as well as provide clear guidance for producers operating in the country. Harmonisation of EPR schemes at the EU level, in particular regarding data reporting by PROs, would help to improve supervision and prevent free riding. It is, therefore, advisable to follow ongoing debates at the EU-level on future harmonisation efforts.

Box 4: Single or multiple PROs – a comparison

EPR systems for textiles can be organised under different governance models. Some Member States opt for a single PRO to centralise operations, while others prefer multiple competing PROs. The following comparison illustrates these contrasting approaches through the cases of Slovenia, France, and the Netherlands.

Slovenia's Environmental Protection Act⁴² (ZVO-2) establishes that for each waste stream, only one not-for-profit, producer-owned PRO is authorised to manage the EPR scheme. The model was legally validated by the CJEU in July 2025 and the Slovenian Constitutional Court in January 2026, showing how an EU country can mandate such a system under the current EU legal framework. For textiles, the situation remains under discussion; the Ministry of Natural Resources and Spatial Planning is drafting textile EPR legislation, but no decree has been adopted yet (as of April 2026).

The centralisation of the PRO has three main drivers in Slovenia:

- Problematic experiences with multiple PROs in packaging, such as fragmentation and financial conflicts.
- Difficulty with sustaining multiple PROs due to Slovenia's small market scale.
- Policy goal to avoid “competition for waste” and ensure funding for reuse and recycling.

⁴²Climate Change Laws of the World (2022), [Environmental Protection Act - ZVO-2 \(Consolidated version\)](#).

In comparison, France has a single-PRO model for textiles, which is the longest-running EPR system, managed by a single government-approved not-for-profit PRO: Refashion. Nearly all producers join this collective system, which coordinates collection, sorting, reuse, and recycling nationwide.⁴³ For other waste streams, France allows PRO competition with multiple accredited organisations. Zooming out to look at the wider EPR landscape in France, the government has often approved a single PRO for more recent and specialised streams.

On the other hand, the Netherlands follows a model of multiple PROs that are competing over producer registrations and balances collective action with producer choice.⁴⁴ Additionally, the PROs operate on a not-for-profit principle. Currently, three PROs are active for textiles: European Recycling Platform Netherlands B.V.,⁴⁵ Stichting UPV Textiel,⁴⁶ and Collectief Circulair Textiel,⁴⁷ with Stichting UPV Textiel being the largest.

Financial vs organisational responsibility

The WFD defines the costs that producers must bear, but it does not regulate whether this responsibility should be solely financial or can also be organisational. It is possible that PROs either take:

- Financial responsibility – where the costs of others, e.g. local authorities, implementing the system are covered.
- Operational responsibility – where the management of the system and its operations (e.g., collection and sorting of textiles) is done by the PRO itself or its contracted partners.

According to the Directive, Member States shall ensure that PROs are not allowed to refuse the participation of local public authorities, social economy entities or other reuse operators that are already operating in the established separate collection system. In addition, it states that social economy entities are allowed to maintain and operate their own separate collection points, they are given equal or preferential treatment in their location and are not required to hand over collected used and waste textile, textile-related and footwear products to the PRO.

⁴³ Refashion (2025). [Se régulariser auprès de Refashion, késako ?](#).

⁴⁴ Circulaire Economie en Afval (n.d.) [UPV textiel: Biedt u textielproducten als eerste op de Nederlandse markt aan?](#).

⁴⁵ [European Recycling Platform Netherlands B.V](#) (n.d.).

⁴⁶ [Stichting UPV Textiel](#) (n.d.).

⁴⁷ [Collectief Circulair Textiel](#) (n.d.).

Taking into account that the WFD does not establish any specific obligation regarding the type of responsibility assumed by PROs, and considering the experience of EPR schemes implemented for other waste streams, it would be advisable for the national legislation implementing EPR to **allow for both types of responsibility:** financial and operational. In this way, since textile waste falls under the competence of local public authorities, which are currently responsible for providing collection services and disposing of residual waste, these authorities should negotiate the model of responsibility with the PROs according to what best suits their local circumstances.

Where financial responsibility is established, local authorities that currently provide the service – either directly (for example, by organising collection) or through contracted private companies or non-profit organisations – would be able to continue doing so. This would allow them to coordinate textile waste collection with other municipal waste collection services and maintain oversight of the management of textile waste within their territory. ZWE's recent paper advocates for local authorities to bring textile waste management under their control and oversight, rather than outsourcing it to external parties.⁴⁸

Conversely, organisational responsibility on the part of PROs may be an appropriate option in cases where local authorities lack the technical capacities required to provide the service. Where organisational responsibility is established, it is essential to ensure the continued role of social economy entities that may already be providing these services.

At the time when EPR for textiles becomes operational and considering the existing EU obligation for separate collection of this waste stream, it is highly likely that textile waste will already be collected and managed, at least in part. In such cases, an approach based on financial responsibility would make it possible to build upon the **existing infrastructure and expertise**. Where reinforcement of the system is necessary, the possibility of organisational responsibility would allow additional systems to be introduced to complement the existing arrangements.

When deciding whether to establish financial or organisational responsibility, it is necessary to consider **the existing waste management operators and the territorial coverage** they provide, which differs greatly across Europe. In areas where collection is more costly or complex, there may be no operators currently providing the service. In such cases, PROs may need to organise collection services in agreement with the relevant local authorities, while transport and treatment would be carried out through agreements with authorised waste management operators (if the EPR schemes do not have their own infrastructure or operational capacity). It would therefore be advisable for the legislation to clearly define such situations and specify the complementary systems that EPR schemes should provide in these cases.

National legislation should also define the technical requirements that **collection systems** must comply with, whether these systems are managed by PROs, in the case of organisational responsibility, or by local authorities, in the case of financial responsibility. In both cases, it is important that the regulatory framework

⁴⁸ ZWE (2025), [Measuring up. First edition of ZWE's municipal manual for circular textile systems](#).

accommodates different collection models while also supporting the prioritisation of high-performing systems that are capable of achieving good results in terms of both quantity and quality.

If the system is based solely on financial responsibility, EPR schemes should support local authorities by providing both technical assistance and financial support to improve existing collection systems, as well as to deploy more efficient and optimised collection models. At the same time, it would be advisable for the legislation to include mechanisms aimed at protecting existing waste management operators, to ensure that the design and implementation of the new EPR scheme does not result in these operators being excluded from the system.

Finally, national legislation should clearly **define the activities and costs that must be covered by EPR**, particularly where financial responsibility is established. This would help avoid divergent interpretations of the regulatory framework and prevent disputes between stakeholders when negotiating agreements with PROs. This is covered more in the next section.

Inclusive governance and coordination entities

The WFD defines which actors, in addition to producers, must participate in the implementation of EPR schemes: social economy entities, local authorities, waste management operators, and reuse and preparation for reuse operators. It also specifies that Member States must ensure that the participation of social economy entities in the collection system is not denied.

Furthermore, regarding the relationship between EPR schemes and waste management operators, the Directive establishes that Member States must ensure that EPR schemes define non-discriminatory selection procedures based on transparent award criteria and that they do not impose disproportionate burdens on small and medium-sized enterprises in procurement processes for waste management services.

In line with the provisions of the Directive, it is important that **the different actors involved throughout the life cycle of textile products participate in the system**, particularly actors such as local authorities, waste management operators, and organisations dedicated to reuse and preparation for reuse, which often have been managing this waste stream for many years and thereby possess valuable knowledge and experience.

National legislation should ensure the participation of different stakeholders in the design of EPR schemes, with the objective of ensuring that the system adequately reflects the interests of the different actors and the diversity of textile and footwear products placed on the market.

Research suggests that a weakness often detected in textile EPR governance is the overlap of responsibilities and the lack of clearly defined roles, particularly regarding coordination between PROs and local authorities. To avoid such shortcomings and ensure the effective participation of all relevant actors, the national legislation implementing EPR schemes could define which stakeholders should be represented in the governing bodies of the respective PROs and what power they hold (e.g., consultative or voting rights).

Apart from the crucial participation of diverse stakeholders in the design of an EPR scheme, the representation of stakeholders within the governance structures of EPR schemes could take several forms, such as:

- Direct representation within the core governing bodies of the system.
- Participation in specific working groups or technical committees.
- The establishment of a dedicated advisory committee composed of representatives of the different actors along the value chain.

Looking specifically at coordination among the various actors, as discussed in the section on [Single PRO vs multiple PROs](#), the creation of a **coordination office** would be advisable where multiple PROs operate simultaneously. The obligation to establish such a coordination office should be legally defined, together with the requirement that all authorised PROs participate in it. This coordination office could serve to:

- Facilitate coordination between public authorities and PROs.
- Monitor the market shares of the different PROs.
- Supervise financial contributions within the system.
- Establish coordination mechanisms among the different PROs.
- Promote the exchange of best practices.
- Monitor competition among PROs in order to prevent a reduction in fees that could lead to insufficient funding of waste management systems.

Another important aspect of coordination within the system is the **establishment of agreements or contracts** between PROs and the different actors involved (local authorities, waste management operators, and social economy entities). In order for Member States to ensure the continued viability of the social economy organisations that are currently providing collection and/or treatment services, the regulatory framework should require PROs to enter into agreements with such organisations. It should also ensure that these agreements protect the interests and long-term viability of such organisations, as well as set minimum performance standard targets that ensure environmental and economic goals are met.

At the same time, Member States should provide guarantees for local authorities so that they do not assume costs that should not fall upon them, while enabling them to implement efficient collection models with high capture rates. The legislation should define the minimum elements that such agreements must cover, such as collection models, minimum technical and service requirements, detailed financial compensation mechanisms, and provisions to promote preparation for reuse. It also should allow local authorities to go beyond such agreements if they wish to be more innovative and pursue higher-performing systems.

The agreements to be concluded may either be individual agreements with specific local authorities or framework agreements to which multiple local authorities may adhere. Where framework agreements are established, it is important that all relevant stakeholders are represented during the negotiation process, including representatives of different types of local authorities, to ensure that the interests of all parties are adequately reflected. They also should remain actively involved in the ongoing monitoring and evaluation of such agreements, so that they continue to improve and remain efficient coordination tools. To guarantee this participation, national legislation could specify which actors should take part in the negotiation and monitoring of such framework agreements.

Regardless of whether individual or framework agreements are established, their successful implementation requires reliable information on waste management, particularly concerning the associated costs.

Financial management

Costs and coverage

The WFD establishes that the costs to be covered by the producers are (article 22a):

“Collection of used and waste textile, textile-related and footwear products and subsequent waste management that entails the following:

- the collection of those used products for re-use and the separate collection of waste products for preparing for re-use, and for recycling, in accordance with Articles 22c and 22d,
- transport of collected used and waste products referred to in point (i) for subsequent sorting for re-use, for preparing for re-use, and for recycling operations, in accordance with Article 22d,
- sorting, preparing for re-use, recycling and other recovery operations and disposal of collected used and waste products referred to in point (i)
- collection, transport and treatment of waste resulting from operations referred to in points (i), (ii) and (iii) by social economy entities and other actors that are part of the collection system referred to in Article 22c (8) and (11);

Carrying out a compositional survey of collected mixed municipal waste.

Providing information, including via appropriate information campaigns, on sustainable consumption, waste prevention, re-use, preparing for re-use, including repair, recycling, other recovery and disposal of textile, textile-related and footwear products.

Data gathering and reporting on separate collection, re-use and other treatment to the competent authorities.

Support for research and development to improve product design for product aspects listed in Article 5 of Regulation (EU) 2024/1781, and waste prevention and management operations in line with the waste hierarchy, with a view to scaling up fibre-to-fibre recycling.”

The Directive also states that the costs to be covered shall not exceed the costs to provide the required services efficiently, and these costs should be agreed upon in a clear and transparent way by all the parties involved (article 8a).

Although the Directive leaves it up to the Member States to decide if producers are to cover, partially or totally, the costs for waste textiles ending up in mixed municipal waste, it would be advisable to establish an obligation for producers to cover the full cost, as they are otherwise borne by municipalities.

The costs to be covered under EPR should be defined based on the provisions set out in the Directive. However, with the implementation of separate collection across the entire territory, the quantity of collected material is expected to increase, while its quality is likely to decrease; this is expected to result in a **lower economic value of the collected materials than seen in current collections**. In this case, revenue from the sale of second-hand products would decrease, so the PRO should provide additional financial support for the collection and sorting stages to maintain economic viability. Collection and reuse targets can provide important guidance for the financial support needed. In addition, the design of the financing scheme should account for the deployment of high-efficiency collection systems capable of capturing larger volumes of separately collected material, thereby enabling compliance with any targets that may be established.

When defining the costs to be covered under the regulatory framework, it is also important to consider the **existing territorial coverage** provided by actors already involved in the different stages of textile waste management. It will, therefore, be necessary to define which activities should be financed through EPR in order to improve the services these actors provide (e.g. provision of containers, improvement of the collection systems, implementation of more efficient systems, such as door-to-door, etc.), as well as to identify the complementary services that PROs should finance or deliver in areas where existing coverage is insufficient.

In order to design the financial scheme and negotiate potential agreements with the different actors involved, it is necessary to understand the **costs and revenues associated with the various collection models**, particularly the most efficient ones (e.g., door-to-door collection). It is essential that local authorities and existing waste management operators participate in defining these costs and that they are established in a transparent manner and periodically updated. Furthermore, differentiated criteria should be considered for different collection systems and/or territories with specific characteristics that may influence collection performance and associated costs. The legislation could also provide that, in cases where the different actors are unable to reach an agreement on cost definitions, independent studies could be used to determine the relevant costs.

To improve the efficiency of the system, the **budget should be aligned with any targets that may have been established**. In this way, funding would be directed to the stages or actors that are most critical for achieving the defined objectives. It would also be advisable for the regulatory framework to allow for an increase in financial allocations when the established targets are not met.

Looking at the coverage of costs for **textile waste collected with mixed municipal waste**, considering that the Directive leaves this decision to Member States, it would be important for the legislation to clearly define which costs producers must cover when it comes to the management of this waste stream. To determine the respective financial responsibility for mixed waste management between municipalities and producers,

separate collection targets or a threshold for separate collection could provide an indicator. Mixed waste audits are crucial to determine the amount of textiles in this stream and are already mandated by the WFD. Member States should, however, consider introducing yearly audits to ensure data quality, if that has not already been established.

The following section outlines the costs that EPR schemes should cover, accounting for the provisions of the Directive and the experience from other existing systems:

Table 3: Proposal of costs and items to be assumed by producer responsibility organisations⁴⁹

TYPE OF COST	ITEM	CHARACTERISTICS OF THE ITEMS
Operating costs	Collection and transport	Financial responsibility should be sufficient to cover the costs associated with the selected collection model, always based on efficient collection systems and considering the territorial context. Transport costs of collected waste are to be covered as well. It should also cover the costs related to the implementation or improvement of services provided by local authorities, including containers and equipment required for the collection and transport of textile waste.
	Sorting/preparation for reuse/reuse/recycling/waste prevention	<p>Financial responsibility should cover the following costs or, in the case of organisational responsibility, PROs should provide the necessary resources to fulfil the following requirements and meet targets (if established):</p> <ul style="list-style-type: none"> - The provision of infrastructure is essential; therefore, current sorting capacities should be strengthened through the development of new infrastructure with adequate territorial distribution and improvements to existing facilities. - Support for activities and agents linked to repair, reuse, and preparation for reuse. This budget item could include the following funding streams: <ul style="list-style-type: none"> • Budget required for meeting reuse and waste reduction targets. • Repair fund (to compensate for part of the cost of repair services). • Reuse fund (to promote reuse services and expand their coverage). • Fund to support the activities of social economy entities (grants aimed at expanding, improving and strengthening their competitiveness). - Investment in local recycling and the deployment of new technologies. These are key elements in defining the financing scheme. - Fibre-to-fibre recycling should be promoted in order to enable the recycling of a wider range of materials. - In case capture rates are insufficient, solutions should be envisaged to recover textiles from the residual waste fraction to complement the achievement of targets and to cover the associated costs. - The costs related to the management and treatment of unsold consumer products that are considered waste should also be covered.

⁴⁹ Source: own elaboration.

TYPE OF COST	ITEM	CHARACTERISTICS OF THE ITEMS
	Disposal	<p>The costs for landfilling, incineration and/or co-incineration of mixed waste, such as fees and taxes, should be included among the costs to be covered under EPR.</p> <p>The responsibility of PROs regarding textile waste that is not separately collected would be a key element in ensuring a comprehensive application of the EPR principle and in preventing local authorities from bearing the economic burden associated with the management of such waste. In order to provide this coverage, waste composition analyses would be required to determine the presence of textile waste within the residual waste fraction and to assess in detail the associated management costs. The methodology, frequency, and territorial scope of these composition analyses should be established through regulatory provisions.</p>
Information, communication and training costs	Communication and awareness raising	<p>The communication obligations set out in the Directive must be fulfilled, with priority given to promoting waste prevention, reuse, green procurement, the extension of product lifetimes, and repair. Information and awareness-raising campaigns should be implemented continuously (not only when the collection system is introduced or modified) and should be adequately resourced at both the municipal and broader territorial levels.</p>
	Management of data, indicators, traceability, and reporting	<p>The costs associated with the implementation and operation of a data management platform should be taken into account.</p> <p>Under a financial responsibility model, the costs incurred by local authorities in relation to the monitoring of services and system performance should be covered.</p> <p>The costs associated with the prevention of non-compliance, including the monitoring and identification of unregistered producers, should also be covered.</p>
	Advice, monitoring, and training for partners affiliated with the system, local administrations, and the managers involved	<p>Developing an advisory and training programme for different stakeholders could be strategic, incorporating key topics such as information management processes and data reporting.</p> <p>This should also include the costs associated with the monitoring of the activities carried out by waste management operators (collection and treatment).</p>

TYPE OF COST	ITEM	CHARACTERISTICS OF THE ITEMS
Costs for the promotion of innovation and system improvement	Promotion of R&D+i	<p>Support for research, development, and innovation (R&D+i) should include adequately funded budget allocations and be coordinated with potential investments and funding programmes from public authorities.</p> <p>In addition, resources should be allocated to promote and facilitate the inclusion of recycled materials into production cycles.</p>
	Improvement in collection and treatment	<p>Priority should be given to the implementation of innovative collection systems capable of achieving high capture rates of high-quality materials. In the case of a financial responsibility model, PROs should provide support to local authorities for the implementation of such systems.</p>
General costs	Indirect costs	<p>This budget item should include the following types of indirect costs:</p> <ul style="list-style-type: none"> - Administration and management. - Licensing and permissions. - Provision of financial guarantees. - Internal audits (and external audits where applicable). - Other general overhead costs.

There are additional aspects beyond those discussed above that should be considered when defining the financing system for EPR schemes. One of these is the need to establish a transitional financing mechanism prior to the implementation of the PRO, to sustain the current waste management ecosystem. Considering the expected decline in the quality of collected materials and the imbalance this may create in the cost-benefit balance of existing operators, many of which are non-profit organisations, the period prior to the system's launch could lead to the collapse of the current management model.

It may also be advisable to establish a minimum funding allocation (e.g., in €/inhabitant) to ensure baseline financing for key areas such as communication and awareness-raising, research, development and innovation (R&D+i), and prevention of non-compliance.

In the case of exports to third countries, the costs associated with monitoring and verifying their quality, as well as proper management of these materials, should also be taken into account.

Finally, when assessing the financial balance of the system, revenues generated through different sales channels should be included. These may include revenues from higher-quality materials, second-hand products destined for export, materials derived from recycling processes, or textile products such as industrial wiping cloths. In the event of fluctuations in revenues (for example, due to export restrictions or declining material quality) or variations in costs, the fees paid by producers to the PROs should be adjusted accordingly to maintain the financial equilibrium of the system.

Fee structure and eco-modulation

With regard to the fee structure and eco-modulation, the WFD establishes that (article 22c):

The financial contributions that producers must make to the Producer Responsibility Organisation (PRO):

- “are based on the weight and, where appropriate, the quantity of the products concerned and, for textile, textile related and footwear products listed in Annex IVc, are modulated on the basis of the ecodesign requirements adopted pursuant to Regulation (EU) 2024/1781 that are most relevant for the prevention of waste generated from textile, textile related and footwear products and for their treatment in line with the waste hierarchy and the corresponding measurement methodologies for those criteria adopted pursuant to that Regulation or on the basis of other Union law establishing harmonised sustainability criteria and measurement methods for textile, textile related and footwear products, and that ensure the improvement of environmental sustainability and circularity of those products;

- take account of the revenues by the producer responsibility organisations from reuse, from preparing for reuse or from the value of secondary raw materials from recycled waste textiles;
- ensure equal treatment of producers regardless of their origin or size, without placing disproportionate burdens on producers, including small and medium sized enterprises, of small quantities of textile, textile related or footwear products”.

In addition, the Directive establishes that: “Where it is appropriate to address ultra-fast and fast-fashion practices and related overgeneration of waste from textile, textile-related and footwear products listed in Annex IVc, Member States may require the producer responsibility organisations to modulate the financial contribution on the basis of producers’ practices, concerning textile, textile-related and footwear products listed in Annex IVc, based on the product life span resulting from such practices, the length of the useful life of those products beyond the first user, and the contribution to closing the loop of those products, by turning waste textiles into raw materials for new production chains”.

The Directive also leaves open the possibility for Member States to assess whether financial contributions should be required from operators (in particular larger ones) that place second-hand textile products on the market for the first time.

The fees to be paid by producers will be determined by the PROs operating the system. However, several aspects should be taken into account when developing the legislation governing EPR to ensure that the fee structure aligns with the objectives pursued through its implementation.

For the calculation of fees, it is important to consider the verification system for each element (which may require certification), the administrative complexity that this may entail, and the need to develop digital tools to facilitate reporting obligations, support companies, and allow simplified declarations for producers below certain thresholds of products placed on the market. It may therefore be advisable to begin with a relatively simple fee structure that facilitates the initial implementation of the system and then gradually evolve towards greater complexity.

As mentioned in the section on [Consumption and prevention](#), as a tool to promote prevention, EPR has so far shown significant limitations. To strengthen prevention efforts and achieve any prevention targets that may be established, the fee structure could include two differentiated fees: one intended to cover waste management costs and another specifically dedicated to financing prevention-related activities. Given the current lack of reliable data on the costs of textile waste management – and even more so on prevention-related costs – these differentiated fees could be introduced at a later stage of the scheme’s implementation. In an initial phase, a defined percentage of the total budget could be allocated to prevention activities, following an approach similar to that proposed in the section on [Reuse and preparation for reuse](#).⁵⁰

⁵⁰ ZWE (2026), [Extended Producer Responsibility for waste reduction](#).

Regarding eco-modulation of fees, compliance with both the Directive and the Ecodesign Regulation must be ensured. The European Commission is currently working on delegated and implementing acts that will establish criteria for the modulation of fees to ensure alignment with the ecodesign requirements applicable to textile products.

Besides weight and quantity (criteria already established in the Directive), the fees for textile products could also be modulated to better align fee structures with the environmental impact of the product. One example is the **materials which the product is composed of**, or other criteria related to **environmental impact**, real management costs, or ecodesign characteristics.

Therefore, it is necessary that any measures established under national EPR schemes fully align with both regulatory frameworks. Taking this premise into account, different parameters could be considered for this modulation. A proposal of possible parameters to include could be:

- Durability (various parameters exist, many of which are regulated through ISO standards and can, therefore, be certified).
- Share of recycled material by weight, distinguishing between pre-consumer and post-consumer recycled content (for which certification schemes also exist).
- Recognised environmental labels or certifications.
- Recyclability, which could include criteria similar to those applied to packaging, such as whether the product is mono-material or multi-material, as well as the presence of accessories and their impact on the separation process. This would require the development of a recyclability index.
- Types and content of hazardous substances or chemicals present in the product.
- Servitisation models that provide incentives for products placed on the market through product-service systems, potentially taking into account the number of use cycles or the expected lifetime of the product.
- Product environmental footprint, based on established methodologies used for environmental performance assessments.
- Product life span resulting from the producer's practices affecting the length of a product's life⁵¹ (marketing practices and release of new designs).

Other aspects to consider when defining eco-modulation criteria include avoiding criteria that focus exclusively on recycling to the detriment of reuse, avoiding criteria that may conflict with other established criteria, assessing the possibility of defining criteria by product category, and ensuring that the criteria established are both achievable and verifiable.

To date, eco-modulated fees applied under EPR schemes have not had a measurable impact on product design or on consumer behaviour due to the relatively small added costs per product. For eco-modulation to

⁵¹ In June 2025, France approved a law that regulates the ultra-fast production of textile products. See: Sénat (2025), [Impact environnemental de l'industrie textile](#).

be a real price incentive for producers to improve product design, fees may have to exceed the costs of current waste management.

Box 5: Fee structure – examples from the Netherlands and France

France

Producer fees in France are calculated per individual clothing item placed on the market and per category.⁵²

- Clothing: €0.5799
- Household item: €0.6525
- Footwear: €0.6414

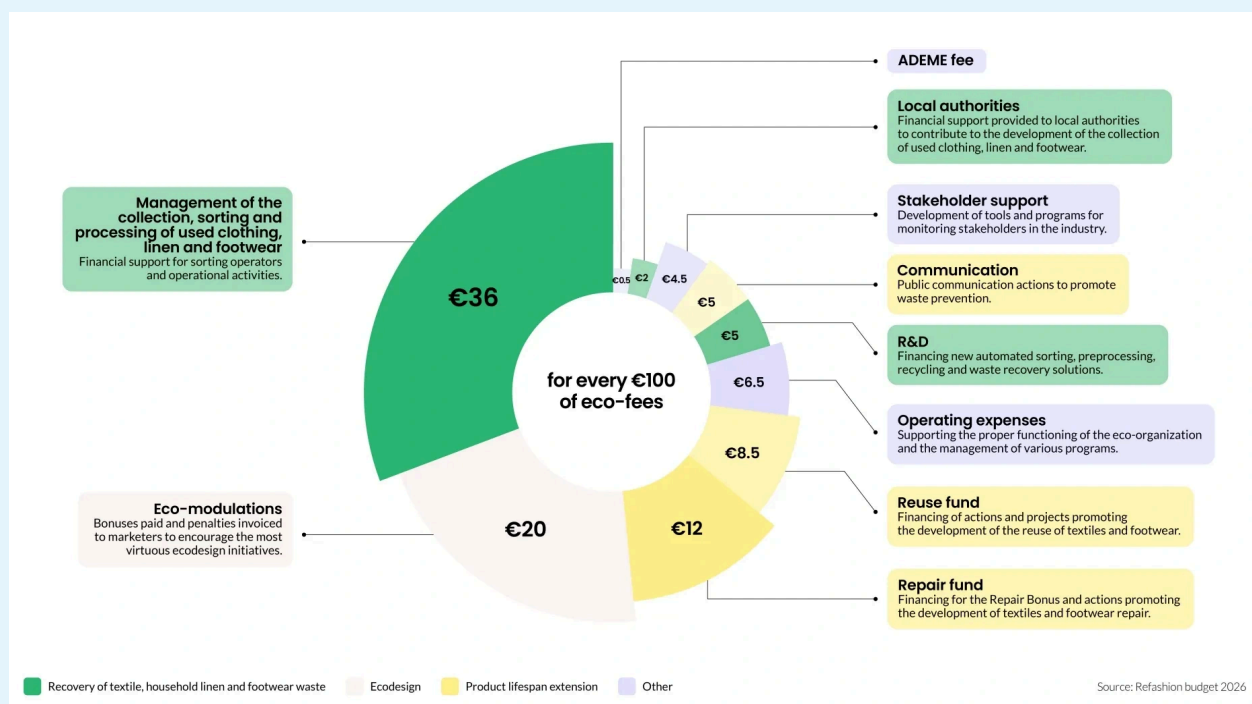
The French system also includes an eco-modulation mechanism. The applicable criteria include the following:

- Durability: Bonuses applied to individual producers, for 11 product categories, with amounts ranging from €0.07 to €0.7 per item placed on the market. Durability is assessed as the product's ability to withstand wear, ageing, and use.⁵³
- Certified products: Producers with products with recognised environmental labels receive a bonus, from €0.03 to €0.3 per item.
- Recycled content: Bonus of €1,000/tonne for post-consumer recycled content.
- Penalties/malus: Applied to products containing metalloplastic fibres or electronic/electrical components. These products are penalised with a +50% increase in the eco-contribution for each category. The penalties are cumulative, so a product containing both can face a +100% increase and cannot benefit from eco-modulation bonuses.

⁵² Information about fees and eco-modulation in France can be found here: Refashion (2026), [Eco-fee guide: 2026 Declaration](#).

⁵³ Refashion (2023), [La durabilité](#).

Distribution of funds obtained from the eco-modulation fees⁵⁴



A noteworthy development in France is the possible fee modulation based on producer practices, as part of the so-called fast fashion law (Notification 2025/336/FR).⁵⁵ The French draft aims to reduce the environmental impact of the textile industry by introducing an eco-modulation ‘bonus-malus’ system designed to target overproduction. Eco-modulation criteria would be set with the aim of better capturing the environmental externalities of overproduction by looking at the price, the number of items placed on the market, company size, and how long the product is used, as well as including a product’s repair cost ratio in durability calculations (which considers the price of a new item in relation to its potential repair cost). Such criteria would only be efficient if they were linked to meaningful and progressive fees per product and penalties which act as significant incentives for brands to improve their practices.

The WFD explicitly grants Member States the freedom to modulate fees on the basis of producers’ practices which lead to the overgeneration of textile waste.⁵⁶ Following this development, as a possibly very impactful measure to reduce textile waste, is advisable.

⁵⁴ Source: Refashion (n.d.), *Eco-fees: the cornerstone of our strategy in the textiles and footwear industry*.

⁵⁵ European Commission (2025), *Draft Law aimed at reducing the environmental impact of the textile industry*.

⁵⁶ (see WFD article 22c, 5a and 6).

The Netherlands

In the Netherlands, the textile EPR system calculates producer contributions per kilogram of textiles placed on the market.

The fee in 2026 is €0.26/kg⁵⁷ of textile placed in the market. From the revenue, 60% goes to collection and treatment costs, 22% to innovation programs, such as fibre-to-fibre with SaXcell,⁵⁸ 12% to the PRO, 4% to a resilience fund and 2% to other costs.

⁵⁷ Stichting UPV Textiel (n.d.), [Producers & importers](#).

⁵⁸ Wonen360 (2025), [Saxcell en Stichting UPV Textiel zetten in op vezel-tot-vezel recycling](#).

Data management and reporting

With regard to data management and reporting, the WFD establishes specific obligations for different actors:

- **Producers:** they must register in the national producer register, providing the information detailed in point 4 of article 22b of the Directive.
- **Producer Responsibility Organisations:** PROs must provide end users with information regarding the role they can play in relation to waste prevention (such as promoting sustainable consumption and encouraging appropriate use of products) and separate collection. Furthermore, they must provide information on opportunities for the reuse and repair of textile products and on the environmental, human health and social impacts associated with textile production. Emphasis should be placed on issues such as fast fashion and the consequences of not properly separating textile waste. This information must be kept up to date and communicated through websites, public spaces and information campaigns, using clear and easily understandable language.

In addition, PROs must publish (at least annually) information on the products placed on the market, the separate collection rate, unsold products, reuse, preparation for reuse and recycling rates (indicating fibre-to-fibre recycling rates separately), as well as the rates for other recovery operations, disposal and exports. They must also provide information on the procedures used for selecting waste management operators.

- **Member States:** National governments must establish the producer register and make it publicly accessible. In addition, every five years Member States must carry out a composition analysis of mixed municipal waste (the first study was required before 1 January 2026). Based on the results, Member States may require EPR schemes to expand the collection network and carry out information campaigns.
- **Online platforms:** Such sites must hold the producer registration number for the products sold through the platform, together with a self-certification from the producers confirming that the products comply with the EPR requirements applicable in the country where the product is consumed. This documentation must also be made available to logistics service providers.

- **Social economy entities:** These organisations must annually report to the competent authority information on the quantities by weight considered suitable for reuse, those destined for preparation for reuse and recycling, and those destined for other recovery or disposal operations, indicating in all cases the quantities exported where possible. Member States may exempt these entities wholly or partially from this reporting obligation.

Based on the obligations established by the Directive, the implementing legislation for EPR schemes could specify additional aspects regarding the information to be reported, as well as the reporting channels and frequency.

When it comes to the information that different actors must report to the public authorities, it is important to ensure harmonisation of the data submitted. This would facilitate the monitoring, aggregation, and comparison of information across actors. To achieve this, the legislation should define the datasets to be included in the required reports and the reporting frequency.

This would apply to reports submitted by EPR schemes to the authorities and to those submitted by waste management operators or local authorities.

The **competent authority** responsible for EPR in each Member State should review, verify and cross-check the data submitted by the different EPR schemes, waste management operators, and local authorities. It would be advisable to establish a harmonised system across the different administrative levels (national and regional), enabling cross-referencing of data from the various actors along the value chain (producers, waste management operators, and public authorities) to validate results and assess compliance with the established targets.

Beyond what is required by the Directive, it would be advisable for national legislation to specify the information that must be provided, the reporting frequency, and the communication channels to be used. Particular emphasis should be placed on information relating to waste prevention, extending product lifetimes, the environmental impacts of products and the ecodesign measures applied to them. Furthermore, in order to facilitate verification throughout the supply chain, legislation could require producers to include their registration number and the EPR scheme to which they belong on invoices or other administrative documents.

National legislation should also define the methodologies for calculating the indicators to be reported, thereby ensuring they are calculated in a harmonised and comparable manner. The legislation could also require producers to provide guidance and information to waste management operators to improve and facilitate sorting and recycling processes.

Regarding **waste management operators**, they must provide information to both the competent authorities and to PROs. The minimum data they should provide would include information on the product category, the

treatment operations applied, and the corresponding destinations. It would be advisable to define the format and content of the reports that waste management operators must submit to the competent authorities, ensuring they are compatible with those submitted to PROs or to local authorities responsible for collection.

Currently, in EPR schemes where several PROs operate simultaneously, it is common for each of them to have its own reporting platform through which waste management operators submit their data. To facilitate reporting, reduce administrative burdens for operators, and harmonise data collection and availability, it would be advisable to develop a common platform shared by all PROs. Through this single platform, waste management operators would submit their data, which would simplify reporting and avoid issues related to data ownership and verification. Where a coordination office is established, it could be responsible for managing such a platform.

Box 6: Example of producer registers – the French case

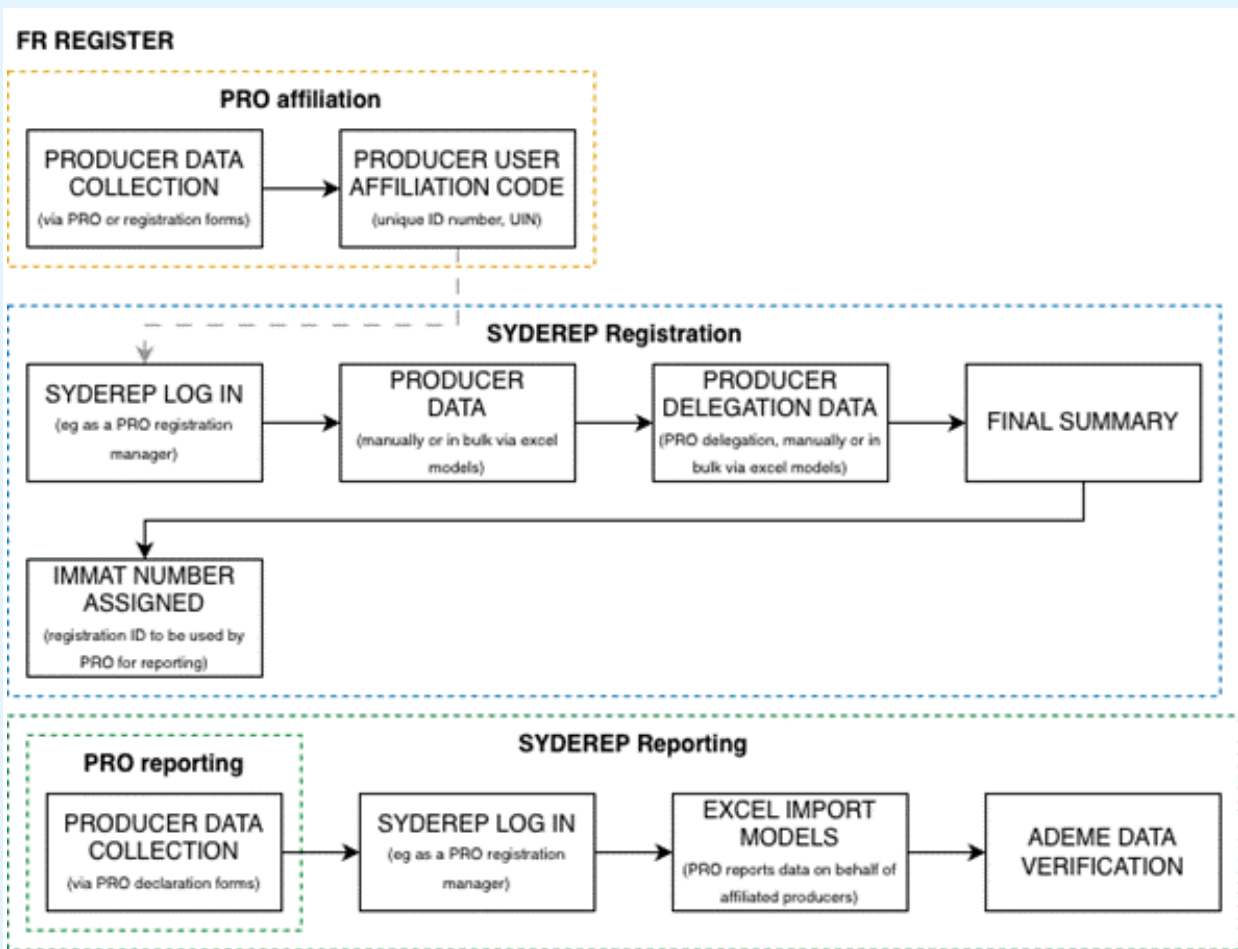
In France, registration to the producer register and the subsequent periodic reporting for all EPR schemes is organised around affiliation with a PRO and the Systeme déclaratif des fillèrees REP (SYDEREP) system.⁵⁹ Textile producers are registered in the SYDEREP system by the PRO Refashion, where they are affiliated. The PRO imports the company data into the system, leading to the assignment of a unique producer affiliation code. The periodic reporting to the relevant public authorities is also completed entirely by the PRO on behalf of affiliated producers. The PRO, which is responsible for data upload,⁶⁰ may submit producer information, either manually or in bulk via Excel templates.⁶¹

⁵⁹ [SYDEREP - ADEME](#) (n.d.).

⁶⁰ Fundació ENT (2026), [LIFE4EPR: D3.1 Stocktake assessment of existing national EPR registers](#).

⁶¹ Fundació ENT (2026), [LIFE4EPR: D3.1 Stocktake assessment of existing national EPR registers](#).

SYDEREP registration and reporting scheme⁶²



⁶² Source: Fundació ENT (2026), [LIFE4EPR: D3.1 Stocktake assessment of existing national EPR registers](#).

Monitoring and enforcement mechanisms

Control of obligations and sanctions for non-compliance

“Member States shall require producer responsibility organisations intending to fulfil the extended producer responsibility obligations on behalf of producers in accordance with Article 8a (3), Articles 22a, 22b and 22d and this Article to obtain an authorisation from a competent authority” (article 22c).

“Member States shall designate the competent authority or appoint an independent third party to oversee that producer responsibility organisations fulfil their obligations in a coordinated manner and in accordance with Union competition law” (article 22c).

“Member States shall establish a register of producers of textile, textile-related or footwear products listed in Annex IVc (“register of producers”) to monitor compliance of those producers with Article 22a and Article 22c” (article 22b).

“Member States shall only allow producers to make available on the market for the first time textile, textile-related or footwear products listed in Annex IVc where they or, in the case of authorisation, their authorised representatives for extended producer responsibility, are registered in the Member State in question” (article 22b).

“The information on each register of producers shall be easily accessible, publicly available and free of charge, machine readable, sortable and searchable, and respect open standards for third party use” (article 22b).

“By 17 April 2027, the Commission shall adopt implementing acts establishing the harmonised format for registration in the register of producers” (article 22b).

“The Commission shall establish a website with links to all national registers of producers to facilitate the registration of producers in all Member States” (article 22b).

Additionally, as explained in the section on [Data management and reporting](#), the Directive also defines the data that PROs must publish and report to the competent authority (article 22c).

The obligation to create a **national register of textile producers**, as mandated by the WFD, constitutes a key piece for the implementation of EPR. This register will provide actual data on the quantities of products placed on the market, serving as the basis for assessing performance and progress towards the established targets. To this end, in addition to the requirements set by the Directive, we recommend that the registers periodically request data regarding the quantity and weight of products placed on the market by product category and by material. To facilitate registering, monitoring, and compliance, the product categories used in the national registers should be harmonised at the European level to ensure the availability of consistent and comparable data.

The Directive also establishes the minimum information that producers must report at the time of registration. Beyond this, we recommend that each Member State must determine which specific data to collect and the frequency with which producers must report. For this reason, the implementing legislation for EPR should clearly define who is **responsible for completing the registration** in each possible scenario (producers without physical presence in the country, designation of an authorised representative, etc.) and the specific data to be submitted. Likewise, the frequency of reporting obligations to the competent authorities should also be defined.

During the development of the textile product register, other existing national registers should be evaluated to determine whether to mirror their structures and functions, helping to avoid existing or historical challenges these systems have faced. The EPR register should be developed in accordance with the **principles of administrative simplicity, digitalisation, and interoperability**, with the aim of minimising unnecessary burdens and facilitating compliance for all parties. In addition, it would be advisable to ensure the highest possible level of harmonisation at the European level.

Although the Directive states that this registration obligation may be fulfilled by PROs, it also allows Member States to require that registration be carried out directly by the producer. Where this responsibility is delegated to the PRO, ultimate responsibility for the accuracy of data reported to the register should remain with each producer. It would be advisable that any new register is launched with a supportive information campaign targeted at producers and PROs. Key information must be disseminated to raise awareness and explain the system's functioning, minimising potential non-compliance or poor data reporting, resulting from a lack of understanding of the registration obligation or its procedures.

It is essential to have **transparent, traceable and verifiable data**, including information on non-compliance (non-registration, false reporting of products placed in the market, false reporting of waste management data by PROs, etc.). Such information is necessary to identify and implement system adjustments that improve ongoing performance. Therefore, to ensure the availability of such data, it would be advisable for national legislation to establish the obligation for PROs to conduct careful, standardised management of information and results, for example, by requiring periodic publication of data and transparency in the origin and methodology of calculating the indicators. To ensure transparency and accuracy of the data, the legislation should also require **external (independent) PRO audits** and define the required frequency and methodology.

Compliance with PROs' obligations must be supported by a **sanctioning regime**. Therefore, the legislation should classify specific infringements according to their severity and establish the corresponding penalties. Enforcing this requires the commitment of the administration, which should allocate sufficient resources to ensure effective implementation.

Monitoring and control of producers in relation to non-compliance

The WFD does not define any specific provisions regarding non-compliance control beyond the registration and data-reporting obligations described in the previous section.

Two types of non-compliance can be identified:

Table 4: Types of non-compliance with EPR obligations⁶³

TYPE OF NON-COMPLIANCE		DESCRIPTION
By omission		The producer, whether aware or unaware of their EPR obligations, does not fulfil its responsibility, neither individually nor collectively.
		The producer, despite not complying with EPR obligations, uses PRO labels or identifiers that indicate compliance.
Non-compliant declarations	Incomplete declarations	The producer is affiliated with a PRO but declares only part of the products placed on the market.
	Misleading declarations	The producer is affiliated with a PRO but intentionally misreports the materials contained in the products placed on the market, with the aim of overstating those with lower fees and vice versa.

The legislation should define the responsibilities of both PROs and public administrations regarding how non-compliance by producers is controlled and monitored, which costs associated with these activities should be **covered and monitored**, as well as which should be covered under the EPR scheme.

Furthermore, PROs should have internal mechanisms to detect non-compliance. Examples of potential **control mechanisms** that could be implemented to address such issues include:

- Conducting audits of annual declarations or cross-checking them with declarations submitted by producers required by national tax authorities.

⁶³ Source: Based on Fundació ENT (2022), [Estudio sobre el fraude en materia de responsabilidad ampliada del productor \(RAP\) de los envases domésticos puestos en el mercado español](#).

- Providing support services to companies. In some cases, particularly for smaller companies, non-compliance with EPR obligations may occur due to a lack of awareness or insufficient resources to manage administrative requirements.

In addition, public authorities should also define mechanisms to control non-compliance. One example would be introducing the obligation for textile producers to include their producer registration number and the PRO to which they are affiliated on all invoices to clients, or cross-checking the data reported by producers with other declarations presented by them to the administration (e.g. excise duties).

Online sales require special attention, as compliance with EPR obligations is particularly challenging in this area. To strengthen oversight, the Directive already establishes the obligation for online platforms to require producers offering products on their marketplace to provide “information on the registration in the register of producers in the Member State where the consumer is located and the registration number or numbers of the producer in that register, as well as a self-certification by the producer committing itself to only offering textile, textile-related or footwear products to which the extended producer responsibility requirements are complied with in the Member State where the consumer is located” (article 22a).

Beyond these controls, additional measures could be introduced, such as requiring producers to provide their producer registration number or proof of affiliation to a PRO when products pass through customs. Each Member State, taking into account its import procedures and available administrative structures, should evaluate these or other control measures, particularly aiming to address products sold online that do not pass through customs or are not subject to inspection.

Box 7: Fraud control in online sales – examples from existing EPR schemes of other waste streams in Germany and Italy

To control online sales, where the risk of EPR non-compliance and free-riding is particularly high, several Member States have adopted specific measures targeting e-commerce platforms, as illustrated by Italy and Germany.

Italy’s approach, introduced under Law 166/2024,⁶⁴ focuses on collaborative compliance through a “pay on behalf” system. This law explicitly makes e-commerce platforms jointly responsible for ensuring EPR compliance for products sold by third parties, including textiles.⁶⁵ This “pay on behalf” system allows marketplaces to collect and remit EPR data and environmental fees on behalf of their sellers. Marketplace operators also must have signed agreements with the relevant national EPR schemes,

⁶⁴ Normattiva (2024), [LEGGE 14 novembre 2024, n. 166](#).

⁶⁵ Erion (n.d.), [Extended Producer Responsibility for Online Marketplaces](#).

while the operators are also mandated to collect data from the EPR-relevant retailers who sell via their platform.⁶⁶

Germany has also adopted a verification-based model. For packaging, online marketplaces are required to verify that online retailers are registered with the LUCID Packaging register⁶⁷ or the WEEE register and have concluded a system participation agreement.⁶⁸ For EEE, the Electrical Electronic Equipment Act (ElektroG)⁶⁹ imposes similar obligations on online marketplaces. These must proactively check that their sellers are correctly registered with the EAR foundation⁷⁰ and their products have a valid WEEE registration number. Non-compliant sellers can be blocked and sales suspended.

Monitoring and control of waste managers and exports traceability

In reference to the control of waste managers, the WFD establishes different mechanisms. Member States shall ensure that:

PROs publish on their websites and provide annually to the competent authorities information relative to “the rates of exports of used textile, textile-related and footwear products listed in Annex IVc assessed as fit for re-use, and exports of waste textile, textile-related and footwear products listed in Annex IVc” (article 22c).

PROs “provide for a transparent and non-discriminatory selection procedure for waste management operators” and publish on their websites and report to the competent authorities information on the selection procedure of waste management operators (article 22c).

“Shipments of used textile, textile-related and footwear products assessed as fit for re-use suspected of being waste may be inspected by the competent authorities of Member States for compliance with the minimum requirements set out in paragraphs 8 and 9” (article 22d).

⁶⁶ Lizenzero (2026), [EPR in Italy: New obligations for marketplace traders regarding textile EPR](#).

⁶⁷ [LUCID](#) (n.d.).

⁶⁸ Händlerbund (2022), [Wichtige Änderungen im Verpackungsgesetz bei Marktplätzen und Fulfillment](#).

⁶⁹ BMUKN (n.d.), [Waste electrical and electronic equipment](#).

⁷⁰ [Stiftung ear register](#) (n.d.).

“Shipments arranged on a professional basis of used textile, textile-related and footwear products assessed as fit for re-use comply with the minimum record-keeping requirements set out in point 8 and are accompanied by at least the information indicate in the point 9” (article 22d).

Also, the Directive indicates that Member States may exempt, partially or totally, social economy entities from the obligation to submit the information in paragraph 12, where the fulfilment of such reporting obligations would result in a disproportionate administrative burden on those entities (article 22c).

Regarding the **monitoring and oversight** of operators (collection, sorting, and treatment operators), the legislation could establish the obligation – both for the public administration and for the PROs –to control the operators participating in the system.

The public **administration** should require all entities performing textile waste collection, transport, sorting, and/or treatment services to hold an authorisation, while allowing for a simplified procedure for certain smaller entities. Additionally, for monitoring purposes, operators should be required to submit periodic reports detailing the quantities, categories, and treatment processes applied to the waste managed, as well as the quantities and destination of the output materials. These periodic reports could be complemented by on-site inspections.

In line with the Directive, the administration should ensure that the procedures for selecting and approving operators, as well as the allocation of materials by PROs, are transparent and non-discriminatory. With the aim of protecting existing operators, most of which are social entities, it is necessary to ensure that these procedures do not exclude them from the new system, nor impose an excessive administrative burden on them. Furthermore, national legislation should define how this monitoring will be implemented in practice.

For the **PROs** themselves, the monitoring of waste operators could be based on ensuring compliance with contractual obligations, as well as through audits to verify the accuracy of data reported in the operators' submissions. Regardless of the control tools defined, these should not imply unequal treatment of operators.

In any case, it would be advisable for the legislation to incorporate obligations and measures for monitoring and supervising operators, to be carried out either by the public administration or by the PROs.

The Directive includes the possibility of reducing or eliminating data-reporting obligations for social-economy entities. It would be advisable for Member States to apply this exemption only to those social-economy entities that manage waste quantities below a defined threshold or, alternatively, allow them to fulfil reporting obligations with the support of larger collaborating entities or associations.

With regard to **exports**, strict control should ensure that exported materials correspond to products suitable for reuse when declared as such. Therefore, in line with the Directive, Member States should establish the

regulatory tools and systems required to ensure specific monitoring of exports. This monitoring should verify that, in the case of exporting material suitable for reuse, a prior sorting process has taken place and that waste intended for recycling, downcycling, or destruction is not exported as reusable products under any circumstances. It should also ensure proper management and environmental guarantees at the destination, in accordance with local regulations. In all cases, compliance with the requirements of Regulation (EU) 2024/1157 on waste shipments must be ensured.

Furthermore, the establishment of EU-wide **end-of-waste criteria for textiles**, currently under development by the European Commission, is considered essential and could have a positive impact if defined and applied appropriately on the proper management of material flows, on the materials resulting from treatment processes, as well as on export control.

Implementation steps and process

The implementation of textile EPR schemes must be based on accurate analyses of the textile sector within each national territory. This should be the first step for all Member States, either those designing new EPR systems or seeking to improve existing ones. This analysis should include the following aspects:

- **National textile products market:** This should include, at a minimum, the identification of the categories of products placed on the market, the quantification of the sales volumes (broken down as much as possible, per category, materials, and producer), the identification of the actors involved throughout the product lifecycle and their roles, as well as the identification and analysis of existing management systems.
- **Textile waste flows:** A detailed analysis of the flows is required to obtain information on their origin and composition, current levels of reuse, separate collection, preparation for reuse and recycling, the treatment processes applied to each product category, and the existing waste management facilities and capacities. Another important aspect is identifying potential limitations or challenges in textile waste management, such as infrastructure gaps or the need for technological development.
- **Current and projected costs:** As a preliminary step to defining an EPR system, it is necessary to gather data on current waste management costs and expected future costs, and to carry out economic projections of the costs incurred by the various actors participating in the system. This is critical to calculating the fees per tonne/kg of textile placed on the market.
- **Environmental impact:** The study should also include an assessment of the expected and avoided environmental impacts resulting from the implementation of the EPR scheme. This can lead directly to the formation of objectives set in the EPR scheme for reuse, recycling, collection, etc.

Following this preliminary study, the regulatory development process should begin, during which decisions on the system's design would be taken and subsequently reflected in the legislation establishing the EPR scheme. The design phase should address the following aspects:

- **Scope of the system:** defining the products subject to EPR, the obliged producers, and whether certain producers or entities would be exempt from specific obligations.
- **Financial model:** the general criteria for defining the fee structure, as well as the mechanisms for financial reporting and auditing, should be established.
- **Governance:** it would be necessary to determine whether multiple PROs or a single PRO will be permitted, the obligations of each actor, how performance monitoring and compliance verification will be carried out, and which mechanisms will be established to ensure system transparency and data traceability.

- **Operational aspects:** for operational implementation, it will be necessary to define the collection models, treatment requirements, data-reporting systems, and other related processes.

With the system design defined, a draft regulatory document should be prepared. The approval process for the legislation will depend on each Member State, but it is important that the process ensures the continued participation of all relevant stakeholders. For this reason, the draft legislation should undergo a public consultation process through which stakeholders can provide input, and this input should be meaningfully reflected in the final text. Technical meetings or hearings with specific sectors should also be conducted, and decision-making power given to important actors in the system beyond producers, such as sorters, recyclers or municipalities.

The next phase would be the implementation of the system. This requires the establishment of key institutions and operations:

- The PRO or PROs as legal entities
- The producers register
- The development of the necessary infrastructure – digital and physical (e.g., collection bins, sorting centres)
- Reporting and invoicing (accounting) structures
- The tools necessary for the required traceability and reporting systems (reporting platforms, audits, controls, etc.)

When beginning to implement the new EPR system, we would encourage a transitional period to allow producers to adapt to the new system, during which pilot tests of the operations/infrastructure could be carried out if considered necessary. It would be important to establish a temporary financing mechanism until the PROs become fully operational, enabling financial support for waste operators and municipalities already providing waste management services. In parallel, information campaigns should be conducted to raise awareness of the new EPR system, its functioning, and the obligations of each actor.

Once the system is operational, continuous monitoring and evaluation should be carried out through the definition of indicators, as well as through the periodic reviews and controls of the PROs established in accordance with the legislation.

Expected outcomes of implementing textiles EPR

The results of adopting EPR systems depend significantly on the objectives established and the PROs' progress towards meeting them. However, this section briefly sets out the main outcomes expected from the implementation of a textiles EPR scheme:

- **Reduction of the environmental impact of the textile sector:** One of the main objectives of EPR should be to reduce the environmental impact of the waste generated by textile products. In principle, the implementation of EPR should improve separate collection rates, leading to an increase in the volumes being reused, repaired, or recycled, and, in turn, to a reduction in the volumes of textile waste being landfilled or incinerated. How well these objectives are met will depend on how the scheme is designed, implemented and the emphasis placed on the upper tiers of the waste hierarchy.
- **Improvement of the textile waste management sector:** Overall, the introduction of an EPR system for textiles could contribute to greater formalisation and strengthening of the textile waste management sector through enhanced recognition and support for existing actors who currently operate in a more informal or unrecognised capacity, as well as improved remuneration, new local job creation, and related improvements.
- **Increased transparency and traceability of textiles put on the market:** As a result of the information obligations established under the EPR scheme, its implementation should lead to more rigorous control of textile waste flows, both in terms of quantities generated and the management processes applied. It should also enable greater transparency and traceability of the data associated with the system.
- **Reduction of the financial burden on public authorities, the social economy sector, and others:** With the implementation of EPR, responsibility would be transferred to producers, who would assume a far greater share of the total financial costs required to manage textile waste. We recommend that EPR schemes specifically cover the costs of managing textile waste not separately collected.
- **Increased public awareness:** One of the expected outcomes of the EPR scheme is enhanced communication with citizens, which should lead to greater public awareness of textile reuse, repair, and recycling options.
- **Increased innovation and technological improvements:** EPR systems should be designed to foster innovation and improve existing technologies in the textile sector, especially those focused on reducing the environmental impact of products. Targets, criteria, and finance should all be geared towards supporting innovation and technological improvements in these areas.

Conclusions

The implementation of EPR for textiles, though not a silver bullet, can help reduce the environmental impact of the sector and steer it towards circularity. However, for this to occur, it is essential that EPR schemes prioritise prevention and reuse in their design and implementation.

EPR schemes across the EU should be increasingly harmonised in many core operational aspects. Such standardisation would help ensure a level playing field for producers in the EU internal market, reduce administrative burdens, facilitate traceability, and improve system efficiency. Although the Directive already establishes a harmonised regulatory framework, Member States should factor in a degree of flexibility to adapt their schemes to the specific circumstances of each country, including the characteristics of the existing market and the availability of existing facilities.

Member States may determine whether only a single PRO should be permitted – requiring all textile producers to join – or whether multiple PROs may operate to encourage competition and better performance. Furthermore, Member States need to decide whether the responsibility of PROs should be financial only or both financial and operational. Each Member State should assess the advantages and disadvantages of each model (as analysed in the sections on [Single PRO vs multiple PROs](#) and on [Financial vs organisational responsibility](#), respectively) and determine which approach best fits its national context.

All actors in the supply chain – from producers to end-of-life operators – should be able to participate in the process of defining textile EPR schemes. For the system to function effectively, it is also important to define the roles of each actor within the system, as well as their respective obligations.

The establishment of specific prevention or reuse targets for textile products would provide key financial support to organisations engaged in these activities, such as social enterprises, and encourage the development of new initiatives with greater ambition. As an interim measure, a dedicated fund for reuse and repair could be established to support the sector before targets are introduced.

The data relating to the system and its outcomes must be publicly available and communicated not only to public authorities but also to citizens as an exercise in transparency. To achieve this, the public administration should define which data must be reported by the different actors, through which channels, and at what frequency. In addition, this data must be traceable, verifiable, and comparable in order to assess the system's functioning and whether the established objectives are being met.

Textile producers must, through the EPR scheme, cover the costs associated with the entire life cycle of their products. This includes the management of textile waste that is not reusable, recycled, or separately collected.

Eco-modulation of fees based on environmental performance and producer practices is welcome; however, such schemes need to be designed to serve as effective financial incentives and may require EPR fees to

exceed the current cost of waste management. The foreseen harmonisation across the EU could be a key lever for this.

During the transition period prior to the launch of textiles EPR, Member States should define a temporary solution to prevent current operators (local authorities and, in many cases, social economy organisations) from continuing to bear the costs of waste management since the obligation to collect textiles is falling on these actors without extra financial resources.

For the system to function effectively, monitoring of the various actors involved is essential. Therefore, the legislation must establish the instruments and control mechanisms that will be used to ensure compliance with obligations, for example, penalties for PROs not achieving targets. Oversight of online sales of textile products requires particular attention.

Given the current environmental impact of the textile sector, the implementation of EPR for this product stream is an essential step that could have a significant positive impact. However, as we have seen with other product streams in the EU, EPR can also end up reinforcing the unsustainable status quo of high production and consumption. Through a textile EPR, the costs of managing textile waste should be transferred to producers, thereby enabling financial compensation for the operators and public authorities currently bearing these costs. However, in order to realise the full potential of EPR in the textile sector, it is crucial to define the objectives clearly – prioritising prevention and reuse – and to design the system to ensure these objectives are met.



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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