


12 specific points to make the EU Textile Circular Economy happen

1. **PARTNERSHIPS**, between buyers (fashion brands/authorities) and makers (from fibres to finished products) needs to be established to educate each other, launch pilots. Collaboration between EU authorities, NGOs, industry, farmers, retail, waste-managers and machine manufacturers need to be set up to use each other's competences and to build up the Circular Economy Action Plan. Industry stakeholders must join the discussion table with all other stakeholders and offer their unique manufacturing knowledge.
2. **DEMAND lowers COST**. While decreasing over the last years, the cost of using recycled materials (e.g. material purchase, new machinery, testing, training, logistics/supply of material) is still significantly higher than virgin materials. This is a critical bottleneck for large-scale market uptake. A clear market signal and higher demand from brands/retailers and Public Authorities make it possible for the value chain to invest in the available solutions and research into new ones. A higher demand will trigger investments and partnership.
3. **PRODUCT DESIGN** (or designed for circularity) shall be rewarded/ incentivised/ recommended. This includes: i) design for recycling or ii) design with recycled or regenerated materials iii) design for longevity. While these features present different requirements, they shall all be promoted and can be combined for greater impact.
4. **CONSUMERS** shall choose what is best for them and the environment. We need educated responsible consumers matching consciousness when purchasing.
5. **NOT ALWAYS**. A Life Cycle Assessment (LCA) shall be considered to assess whether some products/ waste shall be recycled or used for energy recovery, or other. In some case, the cost and impact of recycling may exceed the benefit, however technological innovation may change this over time.
6. **STANDARDS**. Lack of standardisation for recycled materials and their quality, as well as lack of end of waste criteria is a bottleneck, we need agreed European/ global standards. Private initiatives like GRS are used in the market and appear to work.
7. **COLLECTING AND SORTING** of discarded textiles from end-users and factories is complex and time-consuming. This can be modified through organisational changes (partnerships), logistic improvements and new technology.
8. **GREEN PUBLIC PROCUREMENT** and short-supply chains, e.g. in Personal Protective Equipment (PPE) and workwear, may present relatively easier opportunities for circularity. The interest of public procurers for circularity in textiles is welcome and it shall lead to innovation and technical discussions. The national, regional and local procurers can play a key role in incentivising a transition to circularity with their choices, giving signals to markets and rewarding efforts.
9. **LEGACY OF CHEMICAL** substances in recycled materials appears not to be a problem in chemical recycling or if it can be controlled by testing, traceability in the supply chain, others. However better market surveillance to ensure REACH compliance of products introduced to the EU market will be necessary. Products made from recycled materials should fulfil the same requirements as products made from virgin materials.

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10. **NATIONAL BARRIERS.** Across the EU countries there is a need to review national/ local legislation on “waste” management or shipment to understand what barriers to circularity shall be removed, and how to harmonise legislation.
 11. **PUBLIC-PRIVATE FUNDING** needed to trigger: i) creation of reverse logistic infrastructure for consumers and companies, ii) research and innovation and iii) “Materials pools” storing recycled materials. To make innovations commercially profitable, we need bold investments and support for marketing new ecological solutions. It is of paramount importance also in the circular economy that the solutions are told about and marketing of new innovations to consumers is invested in.
 12. **NEW SERVICES** from the textile industry to consumers and value chain partners and other sectors shall be encouraged and enabled.

... and 6 enabling conditions across all twelve points

- I. **SAFETY FIRST**, health and safety of recycled products will have to be the same as those provided by virgin materials.
- II. The **WASTE HIERARCHY** of use less, repair, reuse and recycling shall be respected.
- III. There are and will be many **DIFFERENT SOLUTIONS**, not a single silver bullet. Solutions vary based on product (garment/ technical textiles), materials (natural/ man-made), markets (Consumer goods, industry, Public Procurement).
- IV. **DIFFERENT SPEEDS** changing a whole sector, namely how textile products are made and used in Europe and beyond, will not happen overnight. An Action Plan shall make room for changes happening at different speeds as appropriate. Pioneering companies shall be rewarded, while the large majority of SME's in the sector shall be supported in the transition towards circularity in textiles.
- V. **RESPECT OF LAW.** Need for better market surveillance and REACH enforcement.
- VI. **EUROPEAN GROWTH, GLOBAL ROLE**, a European Action Plan shall contribute to strategic investments, European economic growth, creation of prosperity and employment especially for SMEs. Many opportunities shall be unblocked. The costs for the transition shall not be pushed to SMEs. At the same time a pioneering European policy making initiative shall consider the global value chain and may inspire actions worldwide.