

Extended Producer Responsibility (EPR) for Textiles in the UK

Blueprint for a UK Textiles EPR scheme

Publication date: January 2026

Author: Jordan Girling, Head of Extended Producer Responsibility (EPR), WRAP

Contributors:

- Mark Sumner, Textiles Programme Lead, WRAP
- Emma Wilkinson, EPR Specialist, WRAP
- Thomas Funk, Strategic Engagement Manager, WRAP

About WRAP

WRAP is a global environmental action NGO transforming our product and food systems to create Circular Living. We examine sustainability challenges through the lens of people's day-to-day lives. We transform the systems that provide the products we consume. We catalyse action from policy makers, businesses, NGOs and citizens to make it happen.

Disclaimer: While we have taken reasonable steps to ensure this report is accurate, WRAP does not accept liability for any loss, damage, cost, or expense incurred or arising from reliance on this report. Readers are responsible for assessing the accuracy and conclusions of the content of this report. Quotations and case studies have been drawn from the public domain, with permissions sought where practicable. This report does not represent an endorsement of the examples used and has not been endorsed by the organisations and individuals featured within it. This material is subject to copyright. You can copy it free of charge and may use excerpts from it provided they are not used in a misleading context, and you must identify the source of the material and acknowledge WRAP's copyright. You must not use this report or material from it to endorse or suggest WRAP has endorsed a commercial product or service.

For more details, please see WRAP's terms and conditions on our website at www.wrap.ngo

Glossary

CBMs	Circular Business Models
EEE	Electrical & Electronic Equipment
EPR	Extended Producer Responsibility
EU	European Union
PRO	Producer Responsibility Organisation
R&D	Research & Development
SME	Small and Medium-Sized Enterprises
UK	United Kingdom
WEEE	Waste Electrical & Electronic Equipment
WRAP	The Waste And Resources Action Programme

Table of Contents

Executive Summary	5
1. Introduction	7
2. Product Scope	8
2.1 Electrical/Electronic Textiles	10
3. Obligated ‘Producers’	11
4. EPR Fees	13
4.1 Eco-modulation of EPR fees	14
4.2 Criteria for eco-modulation of UK Textiles EPR fees and alignment with EU eco-modulation	15
4.3 Allocation of EPR funding	17
5. Scheme Governance	18
6. Waste Hierarchy Prioritisation	20
6.1 Acknowledging existing take-back schemes and collection networks	21
7. Awareness Campaigns	23
8. Export Markets	24
9. Enforcement	26
10. Conclusion	27
References	29

Executive Summary

The textile recycling industry in the UK is on the brink of imminent collapse¹. The cost of inaction is great; there is wide consensus that the best way to ensure the future viability of textiles recycling in the UK is through a mandatory EPR scheme. If urgent action is not taken to maintain critical textile recycling infrastructure, local authorities could see the cost of dealing with textile waste increase from £73 million to £137 million². This cost would increase to £200m per year by 2035. Without an EPR scheme for textiles, the cost of dealing with textile waste would largely fall at the door of local authorities and consumers. The environmental consequences of such a collapse would be stark, with an estimated increase of 2.5 million tonnes of CO₂ equivalent per year due to a rise in landfilling and incineration of discarded garments².

Ahead of the UK Government's Circular Economy Growth Plan due early 2026, in summer 2025, key stakeholders supportive of a UK Textiles EPR scheme released a cross-industry position statement. **The statement was published collaboratively by global environmental NGO, WRAP, the British Retail Consortium, British Fashion Council, UK Fashion and Textiles Association, and WEFT,** calling for an expertly designed UK Textiles Extended Producer Responsibility (EPR) scheme to feature in the plans, helping to support the crippled used-textiles sector and address rising production and discarded textiles head on.

The UK's textiles sector has shown overwhelming demand for a UK Textiles EPR scheme that is co-designed with industry and has developed the Blueprint to support its implementation. Building on the principles outlined in the cross-industry position statement, through the UK Textiles Pact, WRAP convened stakeholders of the UK textiles value chain to glean informed insights on what a textiles EPR scheme should look like in the UK. This Blueprint is the output of the convening and summarises the value chain's opinions on how a UK Textiles EPR scheme should be designed and implemented. The Blueprint summarises key industry positions on what a UK Textiles EPR scheme should look like, learnings from preexisting textiles EPR schemes in other countries, and areas that still need further work prior to implementation of a scheme.

All parts of the UK textiles value chain have demonstrated their commitment to ensuring that an EPR scheme for textiles in the UK will be efficient and impactful, generating funding for the sustainable management of used/waste textiles, significantly reducing the quantity of used/waste textiles being landfilled and incinerated, creating a large amount of green jobs, incentivising sector wide adoption of circular design and manufacture of sustainable products, and notably mitigating the risk of a new EPR scheme inadvertently increasing the purchase price of products which would negatively impact consumers.

Summarising this EPR Blueprint, the top 10 key positions and recommendations for a UK Textiles EPR scheme that have been developed through wide industry engagement are listed below. The positions and recommendations were produced using outputs from wide ranging value chain consultations and are therefore, **well informed and reflective of the views held by the UK textiles value chain and signatories of the UK Textiles Pact.**

1. Publish secondary legislation to adopt a mandatory EPR scheme for textiles in the UK, as permitted by the [2021 Environment Act](#).
Legislation should be published in this parliament so that the UK textiles value chain can continue their collaborative work designing and implementing an effective and impactful EPR scheme, with the assurance from the government that their efforts will not be in vain.
2. WRAP advocate for an industry-led EPR scheme, operated by a single, non-profit PRO, with a suitable Advisory / Steering Committee to allow input from the value chain.
3. Whilst the [2018 Resources & Waste Strategy](#) published by Defra and the Environment Agency only applies to England and the geographical remit of the Circular Economy Taskforce only applies to England, there is a consensus amongst stakeholders, including WRAP, that the geographic scope of an EPR scheme for textiles should cover the whole of the UK, including England, Northern Ireland, Scotland, and Wales.
4. The product scope of the EPR scheme for textiles could be phased, but with clear predefined timelines for when particular product types will be included within the scope of the scheme. See [page 8](#) of the EPR Blueprint for suggested phasing. Carpets and three-dimensional household textiles (e.g., upholstery) should not be in scope of the UK's Textiles EPR scheme.
5. To maximise the impact of an EPR scheme for textiles in the UK, legislative definitions of 'producers' with obligations under the EPR scheme should align with definitions in EU EPR schemes and other preexisting producer responsibility schemes in the UK for other problematic waste streams. SMEs should not be exempted from the scheme, but efforts should be made to minimise the administrative and financial burden for SMEs. See [page 11](#) of the EPR Blueprint for details.
6. Funding generated by the UK Textiles EPR scheme should be ringfenced for direct reinvestment into the scheme's success, and charging EPR fees per unit of textiles introduced to the market. See [page 13](#) for details.
7. The secondary legislation that mandates EPR for textiles in the UK should also mandate that EPR fees are eco-modulated, but the legislation itself should not specify the criteria for eco-modulating EPR fees, nor the rates of eco-modulation. The secondary legislation should grant the PRO the autonomy to design and adopt, through collaboration with the wider value chain, appropriate eco-modulation criteria and rates. See [page 14](#) for details.
8. It must be mandatory for the EPR scheme to prioritise the waste hierarchy, particularly to increase domestic reuse rates. See [page 20](#) for details.

9. The UK's EPR scheme should recognise that the UK exports large quantities of used textiles to countries in the 'global south', and the positive and negative impacts of this on the local communities in these regions is complex.

In addition to a UK scheme increasing domestic reuse rates to minimise the level of reuse exports to the Global South, post successful implementation of a UK Textiles EPR scheme that generates funding for UK processing infrastructure, the industry-led PRO could conduct further exploratory work to consider a 'plug-in' to the EPR scheme that 'producers' can engage in voluntarily to further support the Global South with managing used textiles from the UK sustainably. See [page 24](#) for details.

10. The PRO should play an active role in EPR scheme enforcement to ensure a fair playing field for producers and to maximise the impact of the EPR scheme.

1. Introduction

This EPR Blueprint has been created by WRAP to support the development of an Extended Producer Responsibility (EPR) scheme for textiles in the United Kingdom. The document outlines key elements of Textiles EPR schemes and provides recommendations for how such elements should be adopted in a UK scheme. Key benefits of a Textiles EPR scheme in the UK include:

- Significant reductions in the quantity of used/waste textiles being landfilled, incinerated, and leaching into the environment.
- Funding generation for the sustainable management of used/waste textiles.

An EPR fee of £0.10 per garment sold in the UK would generate over £300 million per year, more than covering the predicted costs of dealing with textile waste (£200+ million). Overall, a UK Textiles EPR scheme could generate up to a total of £1.4 billion in funding for national collection and recycling infrastructure by 2035³.

- Funds the creation of skilled green jobs.

The recent packaging reforms in the UK, including the new Packaging EPR system, supported up to 21,000 new jobs⁴. A new Textiles EPR system would also result in the creation of a significant quantity of UK green jobs.

- Incentivisation of circular and sustainable product design and manufacture across the sector, driving the UK towards a truly circular economy.

In July 2025, the [UK Textiles Pact](#) hosted an EPR Working Group to convene key stakeholders of the anticipated UK Textiles EPR scheme. The purpose of the Working Group was to gather opinions and input from relevant stakeholders of the UK's textiles value chain. In September 2025, building on the outputs of the July EPR Working Group, WRAP hosted a full day workshop to gather further opinions on core elements of a Textiles EPR scheme in the UK and to deep dive into considerations for key sections of the scheme and how they will impact assorted stakeholders differently. These sessions aforementioned convening had a deep scope from across the entire textiles value chain, including brands, retailers, trade associations, academia, waste management organisations, reuse and recycling organisations, and the charity retail sector, to ensure that the thoughts gathered were truly representative of the sector. Consequently, the output is a blueprint for a UK Textiles EPR scheme that has been co-designed with the sector.

Utilising stakeholder input during the Working Group and Workshop, as well as background work conducted by WRAP, WRAP has produced this EPR Blueprint to support the development of an informed and impactful Textiles EPR scheme for the UK. The content of the EPR Blueprint is aligned with collective industry positions, as outlined within a cross-industry position paper on a UK Textiles EPR scheme that was released in August 2025 by BRC (British Retail Council), BFC (British Fashion Council), WRAP (The Waste And Resources Action Programme), WEFT, and UKFT (UK Fashion and Textile Association).

2. Product Scope

A product scope of an EPR scheme outlines the products which are classed as in-scope of the scheme and therefore, the products for which scheme participants must pay a fee when they introduce them to the market. In EU Member States, per requirements of the [revised EU Waste Framework Directive](#), the scope of Textiles EPR schemes includes apparel, clothing, accessories, blankets, rugs, bed/household linen, curtains, hats, and footwear.

There is a strong stakeholder consensus that the scheme should cover as many product categories as feasible from the outset and that product scope should be clearly defined prior to implementation and introduced in phases where it is determined a product category cannot or should not be included from the outset.

Textile products which are more challenging to manage should not be excluded from the scope of the EPR scheme because such products will still arise as waste and will need to be processed; therefore, funding should be collected for the management of this waste. There are differing views amongst stakeholders, however, as to whether products which are more challenging to process are included within the product scope of the scheme immediately or whether they are included at a later phase.

<p>Opinion for including challenging products in later phases</p>	<p>Recognising that some products are more challenging to manage, either due to lack of collection/processing infrastructure and/or technical challenges related to processing, some textile products should be included in later phases of the product scope so that there is adequate time to consider infrastructure needs.</p>
<p>Opinion for including challenging products from the outset</p>	<p>Even if existing collection/processing infrastructure is not adequate, products which are more challenging to manage should be included within the product scope of the scheme from the outset so that funding can be generated to create the required infrastructure.</p>

Suggested phasing of product scope for a UK EPR scheme for textiles is below.

Phase 1	<p>Textile products already collected within existing infrastructure.</p> <p>E.g., clothing, accessories, hats, footwear, two-dimensional household textiles such as bed sheets.</p>
Phase 2	<p>Textile products with no/minimal current collection systems are brought into scope. E.g., industrial textiles and textiles used in the hospitality sector.</p> <p>Such products are included within the scope once suitable collection and sorting infrastructure has been established <u>or</u> the required infrastructure needs have been identified, so that any additional funding generated from expanding the product scope can fund the establishment of this infrastructure.</p> <p>It is important to note that any additional products to be included within a second phase of product scope should be predefined in the first version of secondary legislation, along with a specific timeline for when they will become in scope of the scheme.</p>
Later Phasing	<p>Post scheme implementation, consider adding complex product categories if deemed suitable e.g., industrial textiles / textiles used in the automotive sector. Experts should be brought in for informed discussions on potential scope expansions during ‘later phasing’ so that the governing PRO/s can better understand the positives and challenges of their inclusion before considering scope expansion.</p>
Out of Scope	<p>Carpets and three-dimensional household textiles (e.g., upholstery).</p> <p>Products such as three-dimensional textiles (e.g., upholstery) should not be captured within the product scope of an EPR scheme for textiles. In a 2024 report on ‘Options for a Furniture Product Policy Framework’, commissioned by Defra, it was stated that “government intervention is imperative” for this waste stream (i.e., furniture) and “EPR is essential”. In addition to furniture, the product scope of the report included upholstered seats, carpets and other textile floor coverings, mattresses, and soft furnishings such as bedding, quilts, pillows, cushions (and similar soft furnishings). This indicates that products such as pillows, duvets and cushions would be captured under an EPR scheme for furniture.</p> <p>It is also recommended that school uniforms are excluded from the scope of the EPR scheme to prevent EPR product charges inadvertently increasing the purchase cost of the uniforms.</p>

2.1 Electrical/Electronic Textiles

Whether or not a product is captured within the scope of the Textiles EPR scheme should be determined by the primary purpose of the product. For example, a child's shoe with flashing lights is ultimately a shoe, rather than an independent piece of Electrical & Electronic Equipment (EEE), and will still be functional as a shoe if the EEE components malfunctioned. Furthermore, the shoe will likely be disposed of via textile waste management infrastructure. Consequently, the product should be considered as in scope of the textiles EPR scheme.

This reasoning aligns with the UK's existing EEE/WEEE producer responsibility scheme, where *“clothing with novelty lights or sound (or both) – they can still work properly as clothing without the electrical functions”* are not in scope of the EEE/WEEE producer responsibility scheme⁵. Notably, due to the complexity of removing EEE components before textiles can be processed/recycled, stakeholders of the UK's textiles value chain generally feel that products with EEE components in scope of the textiles EPR scheme should receive a penalty under EPR fee eco-modulation.

It should be noted that *“clothing where it includes a fundamental feature which needs electricity to function, such as a gym top with a heart rate monitor, heated walking jacket or a hat with integral speakers”* is in scope of the EEE/WEEE producer responsibility scheme⁵. It is international best practice to exclude products from the scope of an EPR scheme if those products are already included within the scope of an existing EPR scheme; therefore, it is recommended that such products are excluded from the UK EPR scheme for textiles.

3. Obligated ‘Producers’

Organisations that are obligated as a ‘Producer’ under an EPR scheme are the organisations that are obligated to pay an EPR fee for the products they introduce to the market. The way in which a national EPR scheme defines obligated producers determines the quantities of new products placed on the national market that generate funding for their sustainable management once they reach the end of their life. An EPR scheme that has an inadequate definition of producers can result in an unfair and potentially unsupported scheme, whereby a proportion of producers are responsible for financing 100% of used/waste textile collection and management even though they are not responsible for introducing 100% of new textiles to the market.

Regarding EPR schemes for textiles in EU Member States, per requirements of the [revised EU Waste Framework Directive](#), ‘producers’ are defined as:

Any manufacturer, importer or distributor or other natural or legal person who, irrespective of the selling technique used, including by means of distance contracts, either:

- Are established in an EU member state and manufacture textile products under their own name or trademark or have them designed or manufactured and supply them for the first time under their own name or trademark, within the territory of that member state.
- Are established in an EU member state and resell textile products within the territory of that member state under their own name or trademark.
- Are established in an EU member state and supply for the first time in that member state textile products from another member state or from a third country (i.e., importers).
- Sell textile products by means of distance communication directly to end-users, including private households or other than private households, in a member state, and are established in another member state or in a third country.

EPR obligations would apply to products made available on the market for the first time (i.e., first-hand products).

The [revised EU Waste Framework Directive](#) also requires providers of online platforms/marketplaces which allow consumers to purchase products from foreign producers to obtain confirmation from the foreign producer on their registration as a producer in the country where the consumer is located. This is an additional step to minimise the level of non-compliant producers supplying products to the market because in instances where the foreign producer is not EPR compliant, either intentionally or unintentionally due to lack of awareness, they now not only have a direct legal obligation to become compliant but are also essentially being denied market access by the online platforms/marketplaces if they are not compliant.

WRAP recommend that the UK Textiles EPR scheme adopts a similar definition of obligated producers because this definition allows all new textiles products being introduced to the UK market to be captured under the scheme and therefore, generates EPR funding from all new textile products being introduced to the UK market. This EU definition mostly aligns with existing Producer Responsibility schemes for other waste streams in the UK; for example, the [2013 UK WEEE legislation](#) that was written to transpose the requirements of the [2012 EU WEEE Directive](#) pre-Brexit.

Micro-enterprises and SMEs (small and medium-sized enterprises) represent a large proportion of the textiles sector⁶. Therefore, it is important not to underestimate the importance of these enterprises in an EPR scheme. To give SMEs more time to administratively and financially prepare for the adoption of Textiles EPR, in the EU, SMEs (small and medium-sized enterprises) will have a one-year deferral period to comply with Textiles EPR schemes. It may also be prudent for the UK to adopt a similar deferral period.

Additionally, WRAP recommend that the PRO/s adopt some form of simplified registration and/or data reporting and/or EPR fee payment processes for SMEs to minimise administrative burdens. As an example, France's primary PRO for Packaging EPR, CITEO, allows producers selling less than 10,000 units into France per year to pay a flat rate annual contribution of € 80 without the need to submit a data report and producers selling less than 500,000 units per year to submit a simplified annual data report.

4. EPR Fees

The rates of the fees charged to producers for the textile products that they place on the market (i.e., the EPR fees) should represent the real costs of collecting and managing the products once they reach the end of their life. In EU Member States, per requirements of the [revised EU Waste Framework Directive](#), EPR fees are charged by kilogram of products placed on the market. However, for the UK, stakeholders of the textiles value chain typically favour EPR fees being charged per product placed on the market, rather than by weight placed on the market, because:

- There is a concern that charging EPR fees on weight could inadvertently incentivise the lightweighting and therefore, reduced durability, of products.
- Weight does not necessarily provide a reliable metric to assess the number of products that comply with durability, recyclability, or repairability criteria.
- The UK recycling sector report that the real costs of recycling are typically linked to the number of units processed.

WRAP does not recommend, however, a single blanket EPR fee per unit of textiles introduced to the market. The EPR fee per unit presumes an adequate level of product scope categorisation to recognise key differences amongst different types of products; for example, it is easier to process a pair of socks than it is to process a complex jacket.

In addition to charging EPR fees for the textile products that are placed on the market, it is common practice for PROs to charge a nominal annual membership/registration fee to producers to fund the operations of the PRO itself. Such annual fees can also be used to fund enforcement activities that the PRO undertakes. As examples, the [EL-Kretsen](#) WEEE EPR PRO in Sweden charge affiliates SEK 500 (~£40) per year, the [EKO-KOM](#) Packaging EPR PRO in Czechia charge affiliates CZK 1,600 (~£57) per year, and the [Refashion](#) Textiles EPR PRO in France charge an annual administration fee of EUR 30 (~£26), plus the annual ADEME regulator fee. The 2025 ADEME regulator fee is set at EUR 2,784 (~£2,784).

Many EPR schemes charge fees to producers in advance based on forecast sales volumes or actual sales volumes in previous years, then give rebates or additional charges after annual reports have been submitted. This allows for funding to enter the EPR scheme in advance and ensures there is funding for all products being placed on the market even in the case of mid-year business insolvency. This practice could be replicated for the UK's Textiles EPR scheme. As a somewhat similar alternative, some EPR schemes, the UK's Packaging EPR scheme for example, base EPR fees on historic data but without raising additional charges/rebates to simplify the process.

As an example, France's Textiles EPR PRO, [Refashion](#), require registered producers to declare their sales volumes for the previous calendar year between 15 January - 28 January. The declared volumes for the previous calendar year are assumed by Refashion to be a realistic forecast for sales volumes in the current year. An EPR fee invoice is charged to the producer using the current years EPR fees multiplied by the sales forecast for that year i.e., the EPR fee is charged for the year

in advance. Once the producer declares the actual sales volumes at the beginning of the subsequent year, if actual sales were more than forecast then an additional invoice is issued, but if actual sales were less than forecast then a credit note is issued.

One of the Textiles EPR PROs in the Netherlands, [Stichting UPV](#), also charge EPR fees in advance for forecast annual sales volumes, but rather than assuming the previous year's sales volumes will be replicated in the forthcoming year, member producers have the option to adjust their forecast to account for any predicted sales increases or decreases.

4.1 Eco-modulation of EPR fees

The adoption of circular design principles ensures products remain in use for longer, that they are easier to reuse, easier to recycle, and ultimately reduce the carbon, water and waste footprints of the textile sector. Using eco-modulated EPR fees can ensure sector wide adoption of circular design. The eco-modulation of fees refers to product fees being adjusted (increased or decreased) according to defined eco-design criteria, to reward preferred design choices, and disincentivise less sustainable alternatives.

Adoption of eco-modulated fee structures is not essential though, and EPR schemes can operate successfully with basic fee structures. Many schemes around the world have adopted basic fee structures initially and gradually embedded the concept of eco-modulation in the schemes as the schemes evolve over time.

The UK Packaging EPR scheme introduced eco-modulation of fees from the second year of scheme operation to allow producers time to adjust. Eco-modulation for Packaging EPR in the UK is currently based on recyclability. The UK scheme operator of Packaging EPR has created a Red, Amber, Green (RAG) rating system to eco-modulate fees based on recyclability. Recyclability is evaluated using the following factors:

- **Collection:** Whether the packaging is widely collected via kerbside, limited collections at kerbside, or if dedicated takeback schemes are available.
- **Sortation:** If the packaging can be captured and diverted into the appropriate waste streams for further processing.
- **Reprocessing:** If the packaging can go through the technical process of creating recyclate successfully, and outlines any contaminants which disrupts the process.
- **Application:** If a high quality recyclate is produced and there is an end-market for this material.

Producers are required to assess if their packaging is recyclable and rated Red (difficult to recycle), Amber (may experience challenges), or Green (widely recyclable in current UK infrastructure), and receive corresponding eco-modulated fees.

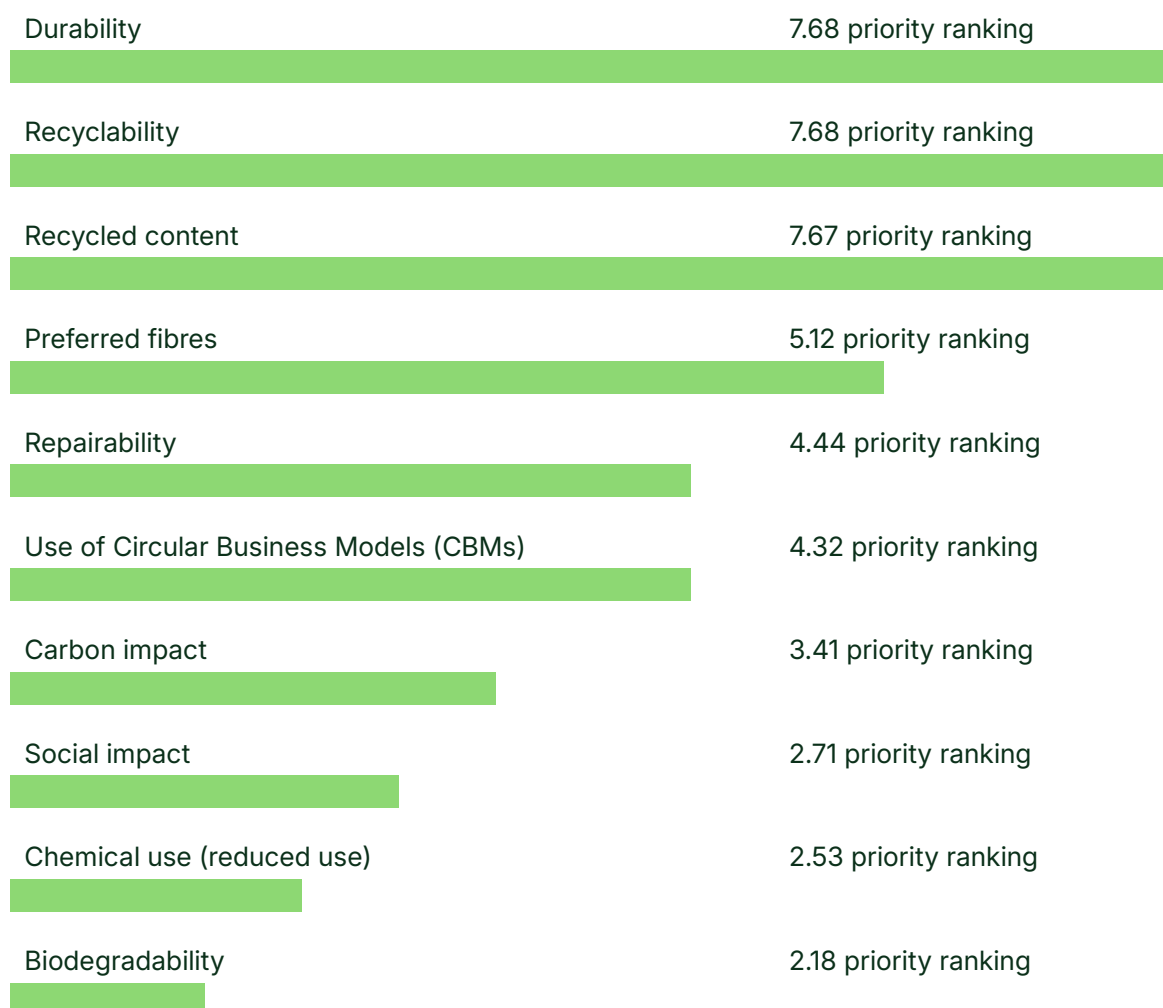
Eco-modulation of Textile EPR fees in the UK is a widely supported concept amongst all key stakeholders as it encourages producers to design the products they place on the UK market to be more circular and sustainable. Consequently, WRAP recommend any secondary legislation relating to Textiles EPR in the UK should permit the eco-modulation of EPR fees.

4.2 Criteria for eco-modulation of UK Textiles EPR fees and alignment with EU eco-modulation

The [revised EU Waste Framework Directive](#) requires that Textiles EPR fees in all EU Member States are eco-modulated based on eco-design requirements (per the [EU Sustainable Products Regulation](#)) that are most relevant to the prevention of textile waste and for the treatment of textiles in line with the waste hierarchy. The revision to the EU Waste Framework Directive permits the European Commission to adopt Implementing Acts which specify further EPR fee eco-modulation criteria. As a result, Textiles EPR schemes in the EU will eco-modulate EPR fees in a harmonised manner, based on the durability of products. Notably, any Implementing Acts published by the European Commission will not specify the level of eco-modulation, and EU Member States are given discretion to set this.

It is important that the criteria used to eco-modulate Textiles EPR fees in the UK is partially harmonised, or at least somewhat aligned, with the criteria adopted in the EU. Many brands produce products for regional/global markets as a whole, not for individual markets. Therefore, if the harmonised EU eco-modulation criteria that is adopted in 27 EU Member States differs from the criteria adopted in the UK significantly, to an extent where the criteria somewhat contradict each other, brands will likely choose to adapt products to satisfy EU eco-modulation criteria to benefit from lower fees across more countries. This could result in the non-aligned eco-modulation criteria in the UK being somewhat redundant.

Stakeholders from the UK textiles value chain are generally most in favour of eco-modulating EPR fees based on product characteristics, such as product durability, recyclability, and recycled content, initially, followed by the adoption of eco-modulation criteria for wider supply chain (e.g., use of Circular Business Models) and environmental impact (e.g., carbon footprint) considerations at later phases. Stakeholders from the UK textiles value chain ranked criteria for eco-modulating fees in order of priority, the results of which are displayed below (the higher different criteria was ranked, the more points it received on the 'priority ranking' output).



As mentioned, stakeholders from the UK textiles value chain think that at least partial harmonisation/alignment with EU eco-modulation criteria is important. However, as the EU EPR schemes will eco-modulate based on product durability but the precise criteria for durability eco-modulation have not been determined yet, presuming that a UK scheme is designed before the EU eco-modulation criteria is determined, it would be more pragmatic for the UK EPR scheme to begin eco-modulating EPR fees against criteria other than durability to avoid potential misalignment in the future. WRAP is already developing a criteria for durability that aligns with current EU approaches, which creates an option for a single score suitable for application to an eco-modulated EPR approach in the future.

To promote the concept of waste being a resource, recycled content inclusion was highlighted as an important criteria for eco-modulation. When setting incentives for recycled content, it should be recognised that some products are easier to make with recycled materials than others. Additionally, the rate of recycled content inclusion should only be as high as practical, i.e., overloading products with unnecessarily high levels of recycled materials for that product type could inadvertently reduce the product's durability.

4.3 Allocation of EPR funding

A methodology for allocating producer-paid EPR fees to fund collection, sorting, reuse, and recycling infrastructure needs to be developed, as well as ensuring the funding is ringfenced for reinvestment into the EPR scheme’s success. During 2025 stakeholder engagements, 11% of stakeholders felt that a funding allocation methodology should be developed in advance of the EPR scheme becoming operational, 11% of stakeholders felt that a funding allocation methodology should be developed by the PRO/s once they have become established, and 71% of stakeholders felt the a funding allocation methodology should be drafted in advance of scheme implementation and finalised by the PRO/s once they become established. Examples of how EPR schemes in other countries allocate EPR funding is displayed in the figures below.

Figure 1: France textiles EPR PRO, ReFashion, operational cost structure. *(data source)*

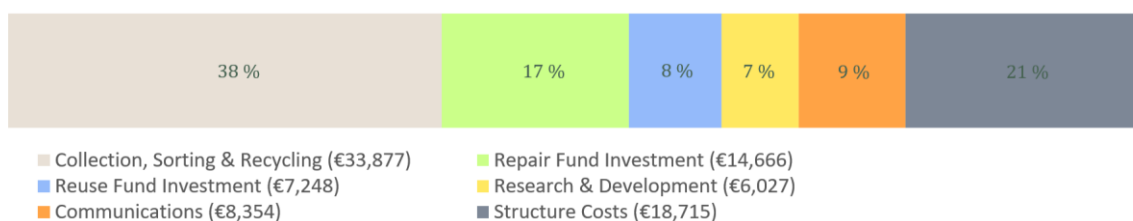
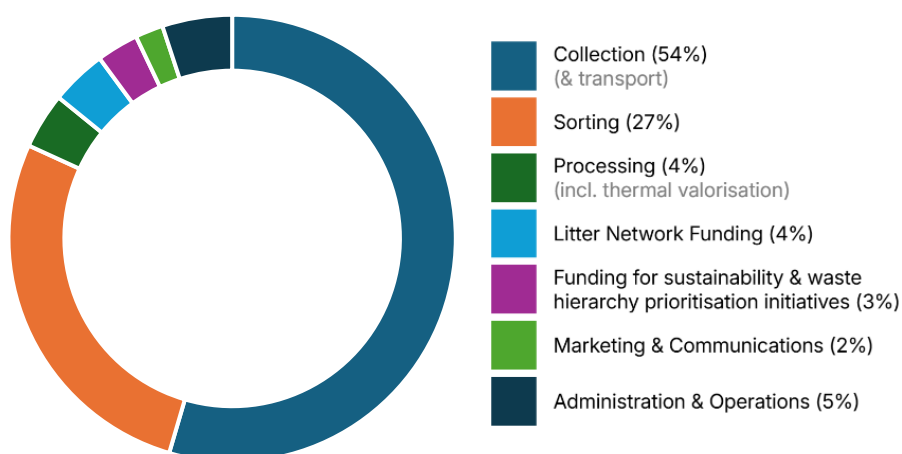


Figure 2: Belgium packaging EPR PRO, FOST Plus, operational cost structure. *(data source)*



Whilst there are different opinions amongst stakeholders from the UK's textiles value chain on how EPR funding should be allocated, the general priorities are displayed below.

Short-Term Priorities	<ul style="list-style-type: none"> • EPR scheme set-up and securing necessary systems (e.g., producer data reporting system). • Investments in domestic used/waste textile management infrastructure, including infrastructure for collections, sorting, grading, pre-processing, reuse and recycling. 	<ul style="list-style-type: none"> • R&D activities to improve the efficiency of the EPR scheme • Continual funding for domestic used/waste textile management infrastructure
Medium-Term Priorities	<ul style="list-style-type: none"> • Investments to improve business and citizen behaviours, i.e., awareness campaigns. • More focused investments to promote waste hierarchy prioritisation, including development of domestic repair systems and facilities. • Financial support for Circular Business Models (CBMs). • EPR scheme enforcement activities. • Funding to support sustainable waste management in export markets.¹ 	
Long-Term Priorities	<ul style="list-style-type: none"> • Investments in more complex processes, including closed-loop fibre-to-fibre recycling infrastructure, creating new end-markets for recycled content or scaling existing end-markets, • EPR scheme enforcement activities. <p><i>This point being duplicated from the row above is intentional to indicate that enforcement is an ongoing process.</i></p>	

The 'Waste Hierarchy Prioritisation' section of this paper ([page 18](#)) provides further discussion on approaches for allocating EPR funding.

¹ This is a topic of contention amongst stakeholder from the UK's value chain. Some stakeholders feel very strongly that an EPR scheme for textiles in the UK must immediately recognise that textile products sold in the UK do not necessarily arise as waste in the UK due to exports for reuse and that there should be a channel for EPR funding generated in the UK to partially flow to export markets in the global south to support waste management activities.

Other stakeholders hold the view that whilst this is an important topic to consider, as there is currently no funding for infrastructure in the UK, this should be the priority. Such stakeholders also typically highlight the complexity involved with transferring funds across borders in a systematic way appropriately and fairly, and therefore, this topic should be part of a longer-term aim to allow time for more exploratory work. See the 'Export Markets' section of this paper (page 21) for further information on this topic.

5. Scheme Governance

EPR schemes are typically controlled and operated by a Producer Responsibility Organisation/s (PRO). A PRO is an organisation formed by a group of companies that have obligations under EPR schemes (i.e., ‘producers’), to collectively fulfil their obligations under an EPR scheme, including, but not necessarily limited to, the obligations to collect, sort, coordinate reuse, recycle, and otherwise process the products that they place on the market once they reach the end of their life.

PROs typically operate with a non-profit organisation registration. Consequently, other than operational administrative costs, all resources would flow into the operation of the EPR scheme and related infrastructure and R&D investments. This approach fosters continuous improvement.

Having a single PRO allows for all producer compliance and performance metrics for the scheme overall to be stored in a central location. It is also easier to regulate and manage a single PRO. A negative to a single PRO is that a poor performing PRO will ultimately result in a poor performing scheme as a whole. A key benefit of permitting numerous PROs to operate is that this can enable specialisms, where different PROs can specialise in different types of products or producer types, which could lead to a more effective scheme overall. Although, with numerous PROs, distributing EPR fee payments to collection/sorting/reuse/recycling infrastructure becomes more complex. Furthermore, with numerous PROs, regulators need to gather data from various organisations and amalgamate that data to produce an overall picture of the EPR schemes performance. This is administratively challenging.

A key principle of EPR schemes is that a range of stakeholders are adequately represented and engaged during the schemes operation. A well operated PRO will typically adopt some form of Advisory / Steering Committee comprising of a certain number of seats reserved for different types of stakeholders in the value chain e.g. producers, collectors, sorters, recyclers, NGOs, waste management operators, etc. As an example of this in practice, France’s Textiles EPR PRO, [Refashion](#), is partially governed by a Stakeholder Committee comprised of producers, waste prevention/ management operators, local authorities, and environmental and consumer protection associations. The Stakeholder Committee provide informed opinions on activities conducted by the PRO; for example, communication activities, chosen textile sorting methodologies, and EPR fund allocations.

WRAP typically advocate for a single PRO at the outset of a new EPR scheme for simplicity of registering obligated producers and receiving data reports, as well as disseminating fees to collection, sorting and treatment operators. WRAP recommend that a Textiles EPR scheme for the UK is led by a single PRO, operating on a non-profit basis, with a suitable Advisory / Steering Committee to allow input from the value chain. During later phasing of the EPR schemes product scope (see the ‘Product Scope’ section of this paper - page 6 - for details), it would also be pragmatic to adopt sector-specific focus groups when integrating more complex textile products into the scope of the EPR scheme.

6. Waste Hierarchy Prioritisation

Many existing EPR schemes for other waste streams internationally have a strong emphasis on recycling and do not necessarily prioritise the waste hierarchy appropriately. Other EPR schemes emphasising recycling is partly a result of policy wording that has a focus on recycling. For example, the [EU 2002 WEEE \(Waste Electrical & Electronic Equipment\) Directive](#) set targets that EU Member States were required to meet for WEEE recovery destined for recycling facilities. Thus, national PROs across the EU that operated under the EPR schemes were required to focus on WEEE recovery for recycling to ensure that targets were met.

The existing end-of-life management channels for textiles are innately different to other product types, such as WEEE and batteries for example. The reuse of textiles before recycling processes are required is a preexisting practice that must be preserved; such practices have been adopted by consumers, and existing platforms (such as charity shops, Vinted, eBay) and they are highly efficient at facilitating this practice. It is important to recognise the best practices and learning from existing EPR systems, but it is also important to acknowledge that waste hierarchy prioritisation is a key principle for a Textiles EPR scheme.

The European Commission and the [revised EU Waste Framework Directive](#) state that textile waste must be managed in line with the waste hierarchy. Used textiles should be directed for reuse as a priority. Examples of waste hierarchy prioritisations within Textiles EPR schemes:

- Netherlands: National Textiles EPR legislation mandates that producers meet reuse targets. 10% of textiles sold must be reused in the Netherlands, increasing to 15% by 2030.
- California: PROs must operate consumer awareness programmes that include information on where consumers can purchase repaired and reused products.

Methods to prioritise the waste hierarchy within an EPR scheme can be considered in the legislation development stage and the scheme operation stage. For example, adoption of mandatory reuse rates would need to be integrated into the legislation itself. Once the scheme is operational, the PRO could adopt methods to promote waste hierarchy prioritisation.

A UK EPR scheme could, and should, promote an increase in domestic reuse rates, both by making products that are suitable for reuse more easily accessible to consumers which can partly be achieved by applying financial incentives to reuse operators, and by supporting consumer behaviour change around second-hand textiles. Increasing domestic reuse rates in these ways will significantly mitigate the concerns of an EPR scheme for textiles indirectly increasing the cost of new products, with product manufacturers increasing the cost of their products to absorb new EPR costs, amidst a cost-of-living crisis because second-hand products do not have an EPR fee applied to them.

Increasing domestic reuse rates significantly mitigates concerns that an EPR scheme for textiles could inadvertently raise the cost of new products during the cost-of-living crisis. By encouraging and incentivising more people to buy second-hand items, which are not subject to EPR fees,

consumers can access affordable good-quality options even if producers adjust new product prices to absorb EPR costs.

As mentioned in the EPR fees section of this paper relating to the allocation of EPR funding (page 14), EPR scheme funding can foster reuse. Examples of how EPR funding can be used to foster reuse include driving the design of durable products which can be used by more than one owner, by investing in repair/refurbish facilities, investing in repair cafés, and funding large scale ‘swap shops’.

In addition to utilising funding generated by the EPR scheme to promote reuse, policy instruments embedded into the EPR scheme itself can also increase reuse rates. Examples of such policy instruments include adopting reuse/repairability targets and/or retailer take-back obligations, requiring returned and unsold stock to be diverted to resale platforms, and applying EPR fee eco-modulation penalties for less-durable ‘ultra fast fashion’ products.

Whilst it would be important for a UK EPR scheme to invest in new methods to promote reuse/resale, it is important to note that there are already avenues for reuse/resale in the UK that should also be supported, the charity retail sector for example. Another good example of preexisting reuse/resale promotion in the UK are operators such as [Reskinned](#). Reskinned design and operate brand take-back programmes, both online and in store, receive returned garments, sort them, and subsequently channel the garments to the highest value next use, ideally directly to resale (currently ~30%), but to repurposing or recycling when direct resale is not suitable due to garment quality. Reskinned list ~1,000 items a day and manage a live inventory of ~60,000 garments, according to [UKFT](#), and receive ~30,000 items through take-back schemes diverting them away from landfill or incineration.

Resale is not only promotion of waste hierarchy prioritisation and sustainability, it can also be profitable. For example, Ralph Lauren adopted a [business model](#) that generates a meaningful revenue stream from resale alone.

6.1 Acknowledging existing take-back schemes and collection networks

Any newly adopted EPR scheme for textiles should recognise that existing collection networks and take-back schemes for used textiles are already operational. Without recognition of existing collection networks, there could be the inadvertent consequence of an abrupt decrease in collection rates once an EPR scheme is implemented if operators of such networks are disincentivised to continue their operation.

As an example of an EPR scheme recognising the pre-existence of take-back schemes, the newly adopted UK Packaging EPR scheme recognises independent take-back schemes for packaging items not commonly collected by local authorities, so would otherwise typically be disposed of in residual waste. The producer operating the take-back scheme must report the weight of material collected and recycled via their take-back scheme, which is then discounted from the weight of packaging they place on the market, reducing the weight of packaging the producer is obligated to pay EPR fees on which acts as an incentive.

The UK Packaging EPR scheme has set criteria that take-back schemes must meet to qualify. The take-back scheme must:

- Be accessible during normal business hours and within a five-mile radius for >75% of citizens.
- Not conflict with kerbside collections, nor encourage consumers to use their scheme instead of kerbside collections.
- Accept used/waste materials from other brands that have similar format.
- Not be required to provide proof of purchase to use the service.
- Provide defined end-markets for reprocessed material and maintain evidence of the weight of material reprocessed.

WRAP recommend that to acknowledge and incentivise used textile take-back schemes, the textiles EPR scheme in the UK should similarly set out take-back scheme criteria so operators can determine if they qualify. WRAP is currently developing such a criteria, to support the design of effective and efficiency take-back through the UK Textiles Pact.

7. Awareness Campaigns

Awareness and education campaigns are an important part of any EPR scheme, partly to ensure that obligated ‘producers’ are engaged with the scheme and partly to support consumers to understand their role to facilitate the correct disposal of used/waste textiles.

Typically, an EPR scheme will focus initial campaigns on producer awareness to ensure that all obligated producers are aware of their obligations to register as such, report data on the quantities of textiles they introduce to the market, and to pay EPR fees accordingly. Once an EPR scheme is well-established, campaigns tend to focus on consumer awareness to support increases in collection rates of used/waste textiles and thereby, increases in reuse and recycling rates. It is typically a duty for the PRO to conduct such campaigns once they are established.

8. Export Markets

The UK export large volumes of used clothing and textiles, primarily to countries in the ‘global south’. Some reports suggest 15 million pieces of used clothing arrive in Ghana every week, primarily from the ‘global north’. Second-hand markets in the global south can be very beneficial to local economies, with reports of approximately two million jobs created by the second-hand clothing market in Kenya alone. But whilst there can be benefits, exporting large quantities of used clothing that cannot all be reused in the receiving countries in practice leads to significant social and environmental tension. Even when the products are reused in practice, they will eventually arise as waste in those countries.

Countries in the global south typically do not possess the waste management infrastructure to handle such large quantities of used/waste textiles which can lead to large-scale dumping and consequently, pollutants leaching into the environment. For example, a huge pile of waste textiles that can be seen from space is in the Chilean desert and a beach of waste textiles exists in Ghana.



Discarded clothes in the Atacama Desert, northern Chile, as seen by a satellite. (image source: [SKYFI](#))



Mounds of waste textiles on a beach in Ghana’s capital, Accra. (image source: [Muntaka Chasant](#))



New informal textile dump site on protected wetlands in Ghana. (image source: [Greenpeace](#))

There is a general consensus amongst stakeholders of the UK textiles value chain that a UK textiles EPR scheme should recognise that textile products sold in the UK do not necessarily arise as waste in the UK due to exports intended for reuse. Therefore, a UK scheme should make efforts to recognise this. Through increasing domestic reuse rates, see [Section 6](#) on waste hierarchy prioritisation with a UK textiles EPR scheme, the UK would reduce the level of reuse exports to the Global South.

Additionally, EPR funding could have the potential to partially flow to export markets, i.e., the funding follows the products. If this approach was to be considered, further exploratory work would be needed prior before it is actioned as no textiles EPR scheme in any other country has done this, so it would be a truly pioneering approach from the UK. Many stakeholders from the UK textiles value chain however, but not all stakeholders, also have the view that as:

- a. The concept of EPR funding following products to export markets is an innovative concept that requires more exploratory work and piloting; and
- b. The UK currently has no funding for domestic infrastructure...

a forthcoming Textiles EPR scheme for the UK could eventually provide support to export markets, but not immediately.

Potential solution: A voluntary initiative layered on top of a mandatory EPR scheme?

Given the differing views amongst stakeholders, the demand on funding for domestic waste management infrastructure as a priority, and the challenges associated with embedding a cross-border fee flowing mechanism into a national EPR scheme, a 'plug-in' to the mandatory EPR scheme that can be engaged with by key stakeholders on a voluntary basis to support UK's main textile export markets could be the most prudent option initially.

This approach would allow a traditionally configured EPR scheme to be designed and implemented in the UK, thereby allowing a scheme to begin operating and providing funding for domestic used/waste textile management as quickly as possible. Once operational, the PRO/s of the EPR scheme could design and integrate an add-on to the EPR scheme which would be operated in parallel with the EPR scheme, but only engaged with on a voluntary basis by supportive stakeholders of the value chain.

As a conceptual example, the PRO/s could charge their producer members the mandatory EPR fee for the new textile products they introduce to the UK market which would be allocated to UK infrastructure. In addition, for those that have committed to being part of the voluntary plug-in, the PRO/s could charge an additional 5% - 10% fee as part of the same invoice which would be allocated to supporting sustainable waste management in export markets. This approach would allow an EPR scheme for textiles to operate in a traditional way, whilst affording the more sustainably minded brands and other stakeholders a mechanism to support sustainable waste management in the UK's main textile export markets.

A proportion of the funding pot generated by the voluntary fee would be channelled directly to sustainable waste management activities in export markets and a proportion of the funding would support work to identify how the funds could be most effectively allocated in export markets in the future. Presumably, the proportion of funding for the latter would be larger once the voluntary plug-in is first adopted, gradually decreasing over time. The funding pot generated by the voluntary fee partially supporting work to identify how funds could be more effectively allocated in the future is an important aspect as it would minimise the risk of funding being allocated unfairly or where minimal impact can be made. Gradually making the voluntary plug-in more efficient and effective over time would make more brands willing to engage voluntarily, with the option of eventually making the plug-in a mandatory aspect of the UK's EPR scheme, albeit recognising that a legislative amendment would be required to make it mandatory.

To reiterate, if this approach was to be considered, further exploratory work would be needed prior before it is actioned as no textiles EPR scheme in any other country has done this, so it would be a truly pioneering approach from the UK.

9. Enforcement

To ensure a fair EPR scheme, active enforcement is vital to minimise the level of non-compliant scheme ‘free-riders’. An EPR scheme that has large numbers of unregistered producers would likely cause the scheme to have insufficient funding to operate adequately. Furthermore, registered and fully compliant producers can become disgruntled by disproportionately funding the management of all textiles being introduced on the market, including those by non-compliant producers, when they are only responsible for introducing a portion to the market in the first instance.

There is a wide range of enforcement activities that a PRO can undertake once an EPR scheme is operational. In addition to direct legislative fines permitted through legislation, a PRO can, for example:

- Actively seek to identify non-compliant producers and engage with them to ensure they become registered.
- Maintain publicly available lists of compliant producers.
- Maintain whistle-blowing channels so that non-compliant producers can be reported to the PRO.
- Acknowledge that issuing large fines to producers that independently identify their non-compliance and seek to take corrective action themselves can deter other non-compliant producers from registering with the hope of remaining undetected. Rather than applying large fines to such producers, PROs could allow producers to make their EPR payments retrospectively for previous years of non-compliance when they first register without the fear of large fines for non-compliance.

10. Conclusion

The UK textiles value chain is widely supportive of an EPR scheme for textiles and have been convening to provide informed input to scheme design and development. The [2021 Environment Act](#) gives powers to introduce an EPR scheme for textiles via secondary legislation. WRAP advocates for such secondary legislation to be developed and enacted so the industry has the assurance that there will be a mandatory EPR scheme for textiles in the UK and so they can continue their work to design, and start to implement, an effective and impactful Textiles EPR scheme.

Summarising this EPR Blueprint, the top 10 key positions and recommendations for a UK Textiles EPR scheme that have been developed through wide industry engagement through the UK Textiles Pact and are listed below. The positions and recommendations were produced using outputs from wide ranging value chain consultations and are therefore, well informed and reflective of the views held by the UK textiles value chain and signatories of the UK Textiles Pact.

1. Publish secondary legislation to adopt a mandatory EPR scheme for textiles in the UK, as permitted by the [2021 Environment Act](#).

Legislation should be published in this parliament so that the UK textiles value chain can continue their collaborative work designing and implementing an effective and impactful EPR scheme, with the assurance from the government that their efforts will not be in vain.

2. WRAP advocate for an industry-led EPR scheme, operated by a single, non-profit PRO, with a suitable Advisory / Steering Committee to allow input from the value chain.
3. Whilst the [2018 Resources & Waste Strategy](#) published by Defra and the Environment Agency only applies to England and the geographical remit of the Circular Economy Taskforce only applies to England, there is a consensus amongst stakeholders, including WRAP, that the geographic scope of an EPR scheme for textiles should cover the whole of the UK, including England, Northern Ireland, Scotland, and Wales.
4. The product scope of the EPR scheme for textiles could be phased, but with clear predefined timelines for when particular product types will be included within the scope of the scheme. See [page 8](#) of the EPR Blueprint for suggested phasing. Carpets and three-dimensional household textiles (e.g., upholstery) should not be in scope of the UK's Textiles EPR scheme.
5. To maximise the impact of an EPR scheme for textiles in the UK, legislative definitions of 'producers' with obligations under the EPR scheme should align with definitions in EU EPR schemes and other preexisting producer responsibility schemes in the UK for other problematic waste streams. SMEs should not be exempted from the scheme, but efforts should be made to minimise the administrative and financial burden for SMEs. See [page 11](#) of the EPR Blueprint for details.

6. Funding generated by the UK Textiles EPR scheme should be ringfenced for direct reinvestment into the schemes success, and charging EPR fees per unit of textiles introduced to the market. See [page 13](#) for details.
7. The secondary legislation that mandates EPR for textiles in the UK should also mandate that EPR fees are eco-modulated, but the legislation itself should not specify the criteria for eco-modulating EPR fees, nor the rates of eco-modulation. The secondary legislation should grant the PRO the autonomy to design and adopt, through collaboration with the wider value chain, appropriate eco-modulation criteria and rates. See [page 14](#) for details.
8. It must be mandatory for the EPR scheme to prioritise the waste hierarchy, particularly to increase domestic reuse rates. See [page 20](#) for details.
9. The UK's EPR scheme should recognise that the UK exports large quantities of used textiles to countries in the 'global south', and the positive and negative impacts of this on the local communities in these regions is complex.

In addition to a UK scheme increasing domestic reuse rates to minimise the level of reuse exports to the Global South, post successful implementation of a UK Textiles EPR scheme that generates funding for UK processing infrastructure, the industry-led PRO could conduct further exploratory work to consider a 'plug-in' to the EPR scheme that 'producers' can engage in voluntarily to further support the Global South with managing used textiles from the UK sustainably. See [page 24](#) for details.

10. The PRO should play an active role in EPR scheme enforcement to ensure a fair playing field for producers and to maximise the impact of the EPR scheme.

It is unusual for an entire industry to ask UK Government for regulation, but the UK's textiles value chain is clear in its strong support for a mandatory Textiles EPR scheme. The sector is not asking UK Government to design an all-encompassing EPR scheme that the sector can adopt, they are asking the UK Government to provide the legislative basis for a scheme so that the sector can continue their work to design and implement the scheme.

There is wide consensus that the best way to ensure the future viability of textiles recycling in the UK is through a mandatory EPR scheme and in the absence of this, the existing infrastructure is at risk of collapse. The UK's textiles sector understands the potential costs and impacts of inaction, which is why there is broad support for a mandatory textiles EPR scheme. Continuing forward without a mandatory scheme will likely prompt widespread concern from across the value chain.

The sector has demonstrated their commitment to ensuring that the EPR scheme for textiles in the UK will be efficient and impactful, generating funding for the sustainable management of used/waste textiles, mitigating the risk of a new EPR scheme inadvertently increasing the purchase cost of products which would negatively impact consumers, significantly reducing the quantity of used/waste textiles being landfilled and incinerated, incentivising the introduction of more circular and sustainable products to the UK market, and creating a large amount of green jobs.

References

1. Circular. 2025.

www.circularonline.co.uk/news/wrap-warns-of-high-costs-if-used-textiles-sector-goes-under/https://www.circularonline.co.uk/news/wrap-warns-of-high-costs-if-used-textiles-sector-goes-under/www.circularonline.co.uk/news/wrap-warns-of-high-costs-if-used-textiles-sector-goes-under/

2. WRAP. 2025. ACT UK - Transitioning to a UK circular textiles ecosystem report.

www.wrap.ngo/resources/report/act-uk-transitioning-uk-circular-textiles-ecosystem-report?auHash=nmArg3kbt_chYdre3nl321zPQWDLpkWPjaVjP2Rs_mQ&utm_source=UK+Textiles+Pact+-+Voluntary+Agreement+Members&utm_campaign=a35ee69f9e-EMAIL_CAMPAIGN_2025_04_29_08_39_COPY_01&utm_medium=email&utm_term=0_-e4362d521b-

3. Resources Futures. Circular Economy News. 2025.

www.linkedin.com/posts/circular-economy-news_circulareconomy-textilerecycling-epr-activity-7343566899642847232-DPzg?utm_source=share&utm_medium=member_desktop&rcm=ACoAABSyzr0BpdPY8ZwQsuo-85WV8tTqe8bfEe8

4. UK Government. 2025. The new scheme administrator for Packaging Extended Producer Responsibility.

www.gov.uk/government/news/packuk-the-new-scheme-administrator-packaging-extended-producer-responsibility#:~:text=In%20turn%2C%20it%20will%20boost,and%20in%20England%20alone%2C%20support

5. Environment Agency. 2025. Electrical and electronic equipment (EEE) covered by the WEEE Regulations.

www.gov.uk/government/publications/electrical-and-electronic-equipment-eee-covered-by-the-weee-regulations/electrical-and-electronic-equipment-eee-covered-by-the-weee-regulations

6. SME United. 2021. Joint position on the EU strategy for sustainable textiles.

www.sbs-sme.eu/wp-content/uploads/2024/01/SBS-SMEUnited-Position-Paper_Sustainable-Textiles-Strategy.pdf

• Figure 1 (France textiles EPR PRO, ReFashion, operational cost structure) data source.

ReFashion. 2024. Financial Statement.

www.rapport-activite.refashion.fr/en/bilan-financier

• Figure 2 (Belgium packaging EPR PRO, FOST Plus, operational cost structure) data source.

FostPlus. 2024. Activity Report.

[www.fostplus.be/sites/default/files/media/document/2025-06/Activity report 2024.pdf](http://www.fostplus.be/sites/default/files/media/document/2025-06/Activity%20report%202024.pdf)

- Image 1 (Discarded clothes in the Atacama Desert, northern Chile, as seen by a satellite.) source.

SKYFI. 2025.

www.skyfi.com/en/blog/skyfis-confirms-massive-clothes-pile-in-chile

- Image 2 (Mounds of waste textiles on a beach in Ghana's capital, Accra.) source.

Muntaka Chasant. 2023.

www.dailymail.co.uk/sciencetech/article-11391883/Mountains-garments-promised-reused-brands-like-H-M-flooding-streets-Ghana.html

- Image 3 (New informal textile dump site on protected wetlands in Ghana) source.

GreenPeace. 2025.

www.unearthed.greenpeace.org/2025/06/18/uk-brands-fashion-dumps-african-protected-wetlands/