

# #EUCircularTalks

## Waste Framework Directive - Paving the way for a circular Textiles Industry

5 December 2023 - 14:30 - 16:30 CET



# Preparation of extended producer responsibility for textiles in Germany

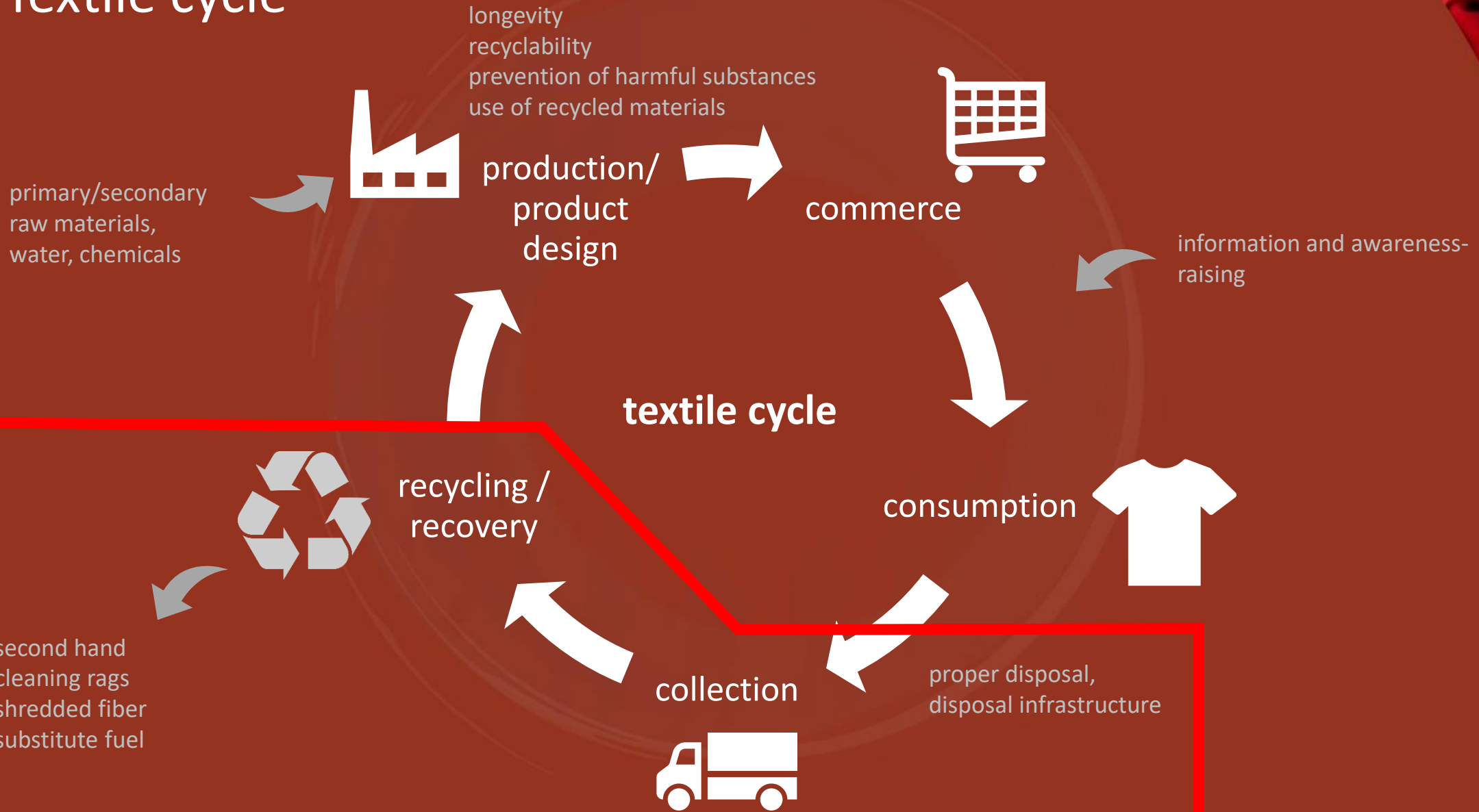
Dr. Sina Depireux

Section III 1.5 – Waste Management, Transboundary Shipment of Waste  
German Environment Agency

**Umwelt  
Bundesamt**



# Textile cycle



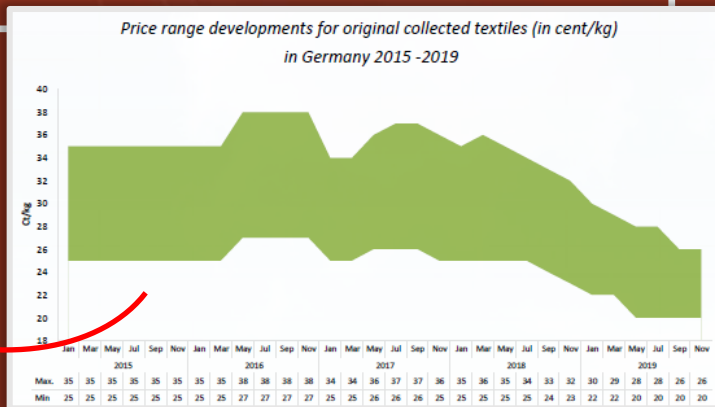


# Textile waste - volumes



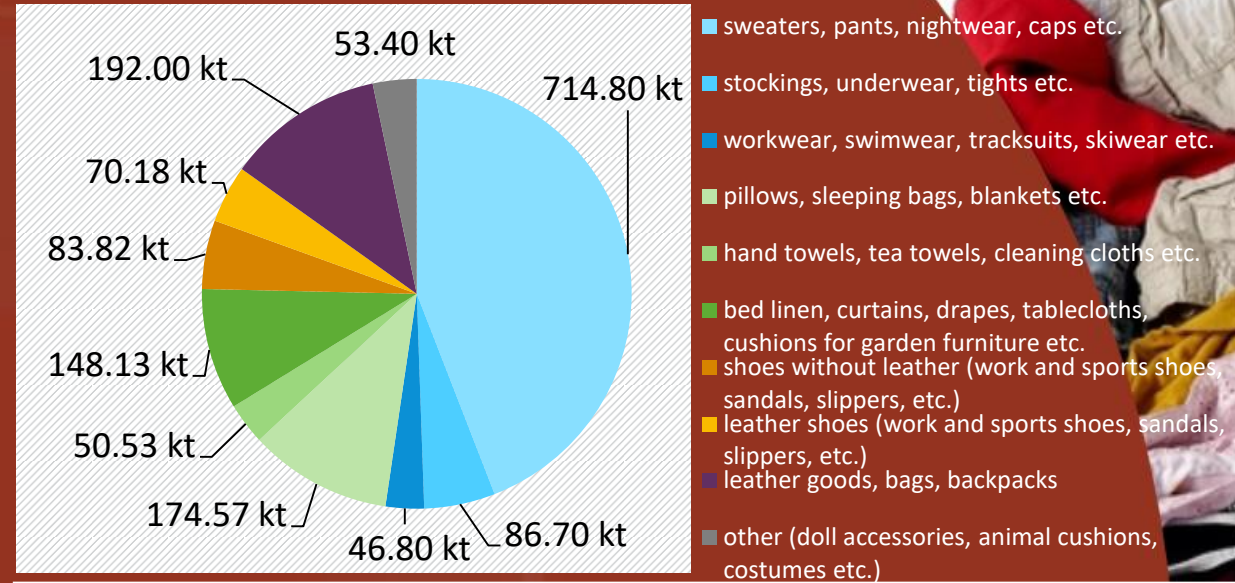
- voluntary collection system already established
- mandatory separate collection of used textiles from 2025 laid down in the German Circular Economy Act to be perceived by public disposal providers
- disposal system is currently mainly financed by second-hand sales
- increasing quantities and decreasing quality of collected textiles  
→ Disposal no longer financially viable in future

**Disposal problem is looming in Germany!**

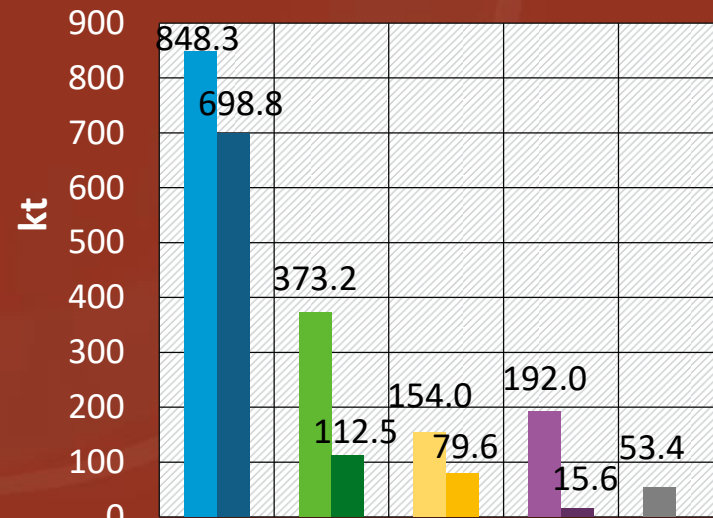


source: bvse 2020

put on the market in 2021: 1.62 Mio. t



comparison of quantity put on the market vs. quantity collected



clothing  
home textiles  
shoes  
leather goods  
other

**≈ 1,0 Mio. t collected textile waste**

**collection rate ≈ 62 %**

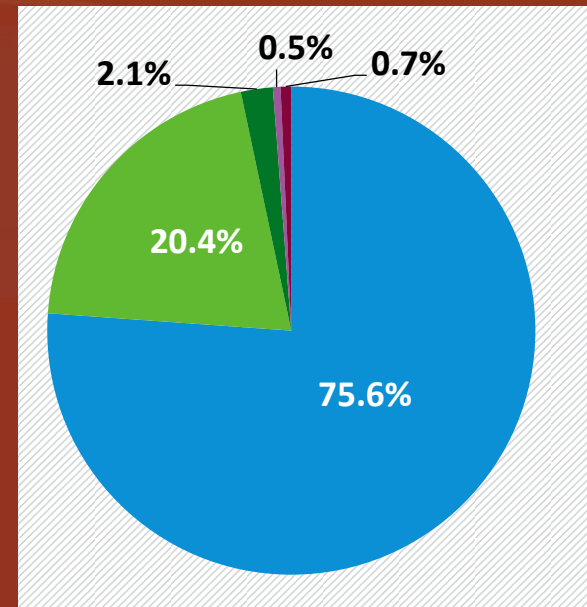
source: UBA-Texte 146/2023

# Textile waste - collection



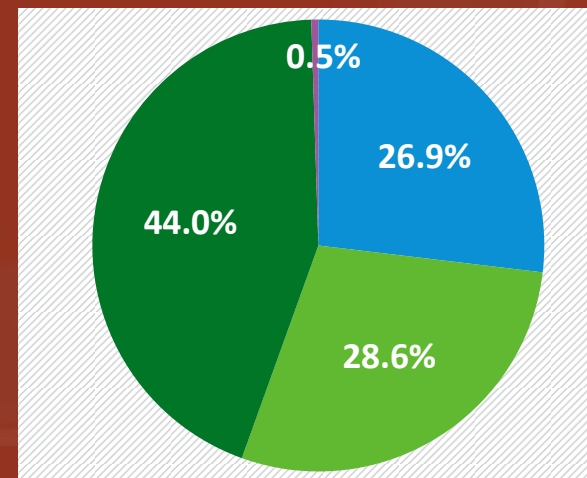
- collection mainly via bring bank containers (90-95%); take-back in retail to be neglected (0.7%)
- main collector: commercial/private collector (44.0%), followed by social enterprises (28.6%) and public disposal provider (26.9%)
  - voluntary take-back (Producer, retail) to be neglected (0.5%)

Applied collection systems and their shares in 2018



- bring bank containers
- civic amenity centre
- street collection
- waste collection container
- take-back in retail

collectors in 2018



- public disposal providers
- social enterprises
- commercial/private collection
- voluntary take-back

# Textile waste – recycling / recovery



- no fiber-to-fiber recycling implemented on a large scale yet
- downcycling of used textiles to cleaning rags and ripped goods

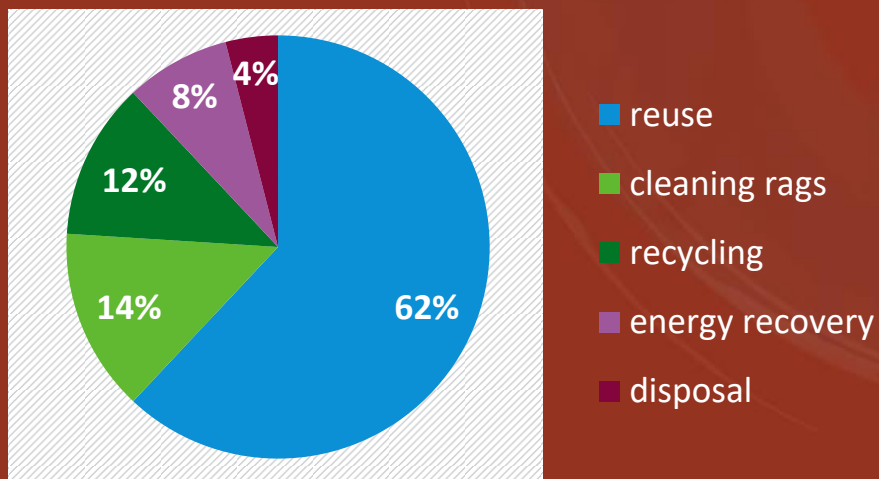


- textile waste have not yet been specifically regulated with regard to resource-conserving waste management
- requirements in the German Circular Economy Act are not sufficient, as municipal systems are primarily designed for collection

**Introduction of extended producer responsibility is recommended, as it has the greatest positive effects on promoting the textile circular economy**

Development of possible models of extended producer responsibility for textiles

treatment of textile waste in 2018





# Recommendations on the scope of the EPR and developed EPR-models



- all textiles that typically occurs in private households, i.e. both **privately (b2c) and commercially (b2b) used textiles**, should be included in the scope

**clothing and accessories**  
**shoes**

**home textiles (without carpets and mattresses)**  
**pillows and blankets**

- special textiles (textiles with personal protective equipment, uniforms, etc.) separate consideration is necessary; need for research
- it should be excluded:
  - Textiles for animals or dolls
  - within the product groups, individual products should be excluded, such as ski or ice skates, wiping cloths, cleaning cloths



model 1 – Fund model



model 2 – Producer-led model



model 3 – systems in competition



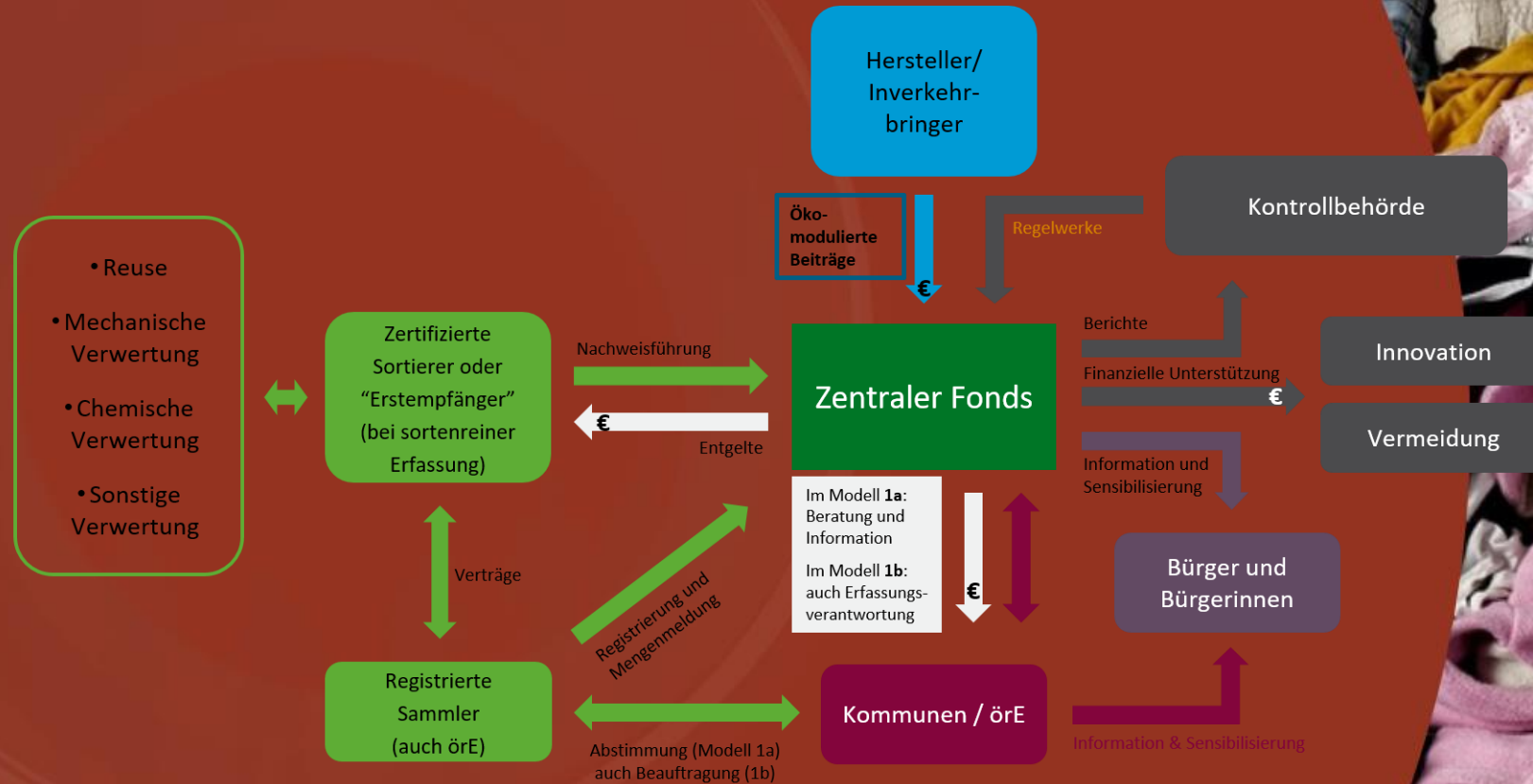
model 4 – contract model



# model 1 – Fund model



- Establishment of a central fund management agency
- Fees based on the textiles placed on the market, graduated according to ecological criteria
- Compliance with requirement to cover all costs, prohibition of cost overruns, principle of cost efficiency and transparency
- Direct financing from the fund where (financial) support is required (sorting, recycling, etc.)





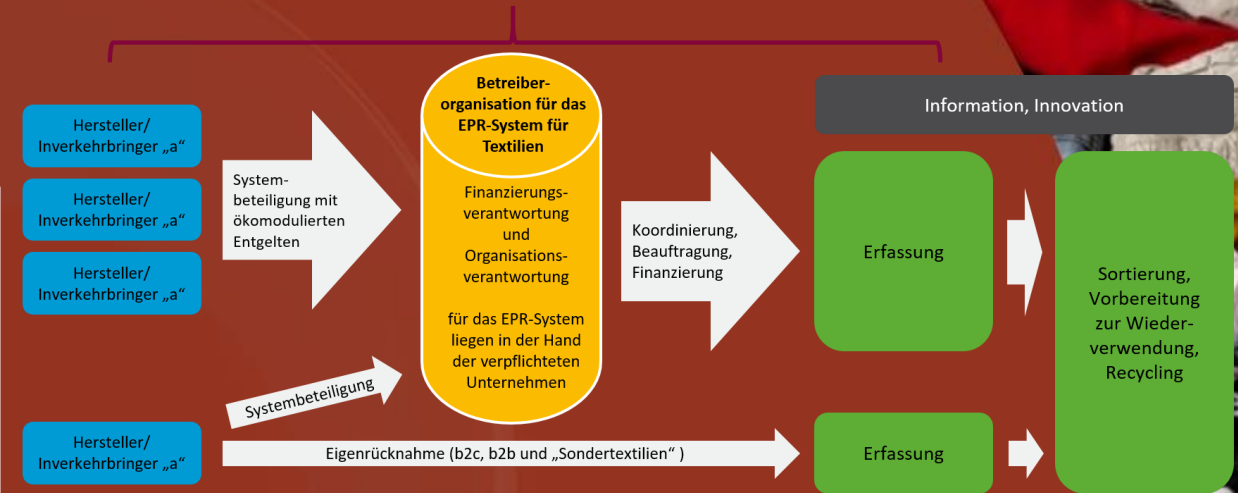


# model 2 – Producer-led model

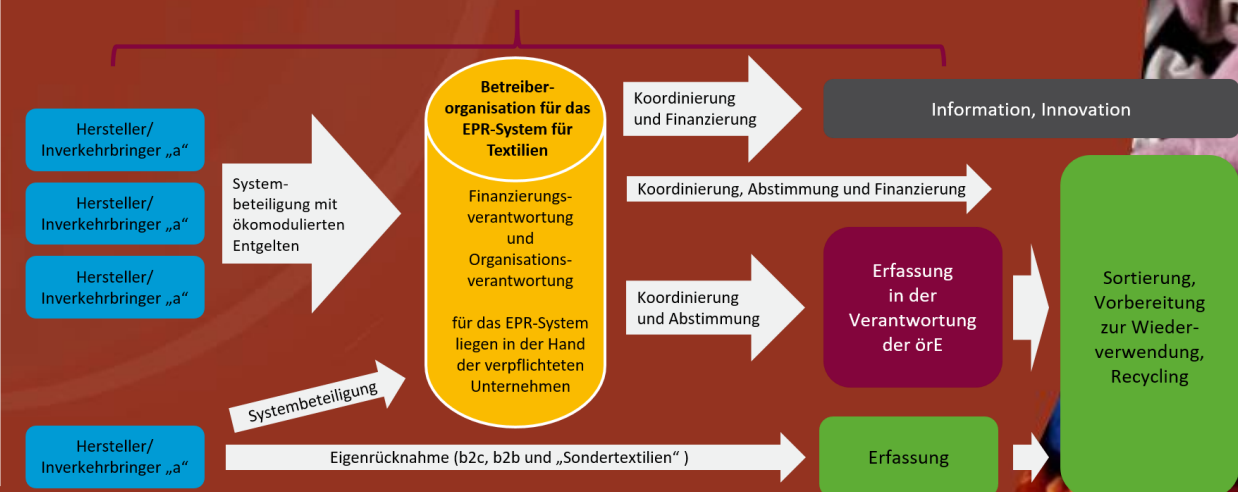


- Organizational and financing responsibility by obligated producers; non-profit organization
- Requirements for collection, preparation for reuse and recycling as well as communication, information and innovation
- Self-collection or participation in the jointly operated system; even in the case of self-collection, registration in central register and payment of fees for communication, information and innovation
- Control and consolidation of all information via central register
- Model 2b: collection by public disposal providers, assigned to the jointly operated system; self-collection of producers possible

**Zentrales Register**  
Das zentrale Register ist die zuständige Kontrollbehörde. Sie prüft u. a. die Registrierung, Systembeteiligung, alle Datenmeldungen und die Erfüllung aller Anforderungen zur Erfassung, Sortierung, Verwertung und weiterer Verpflichtungen.



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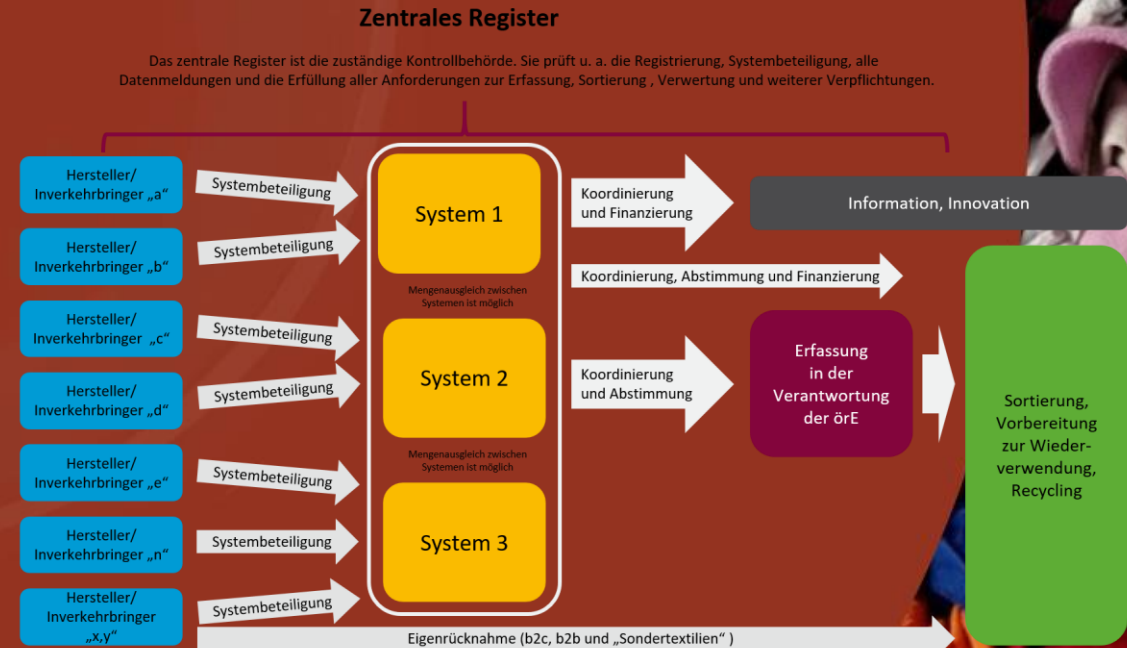
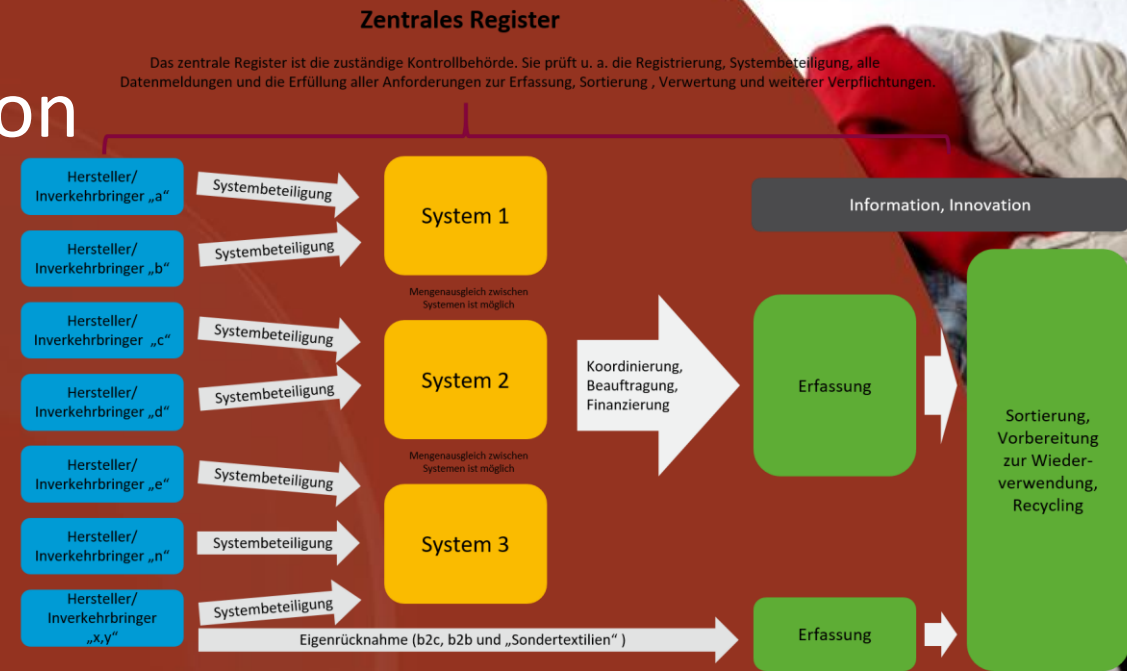




# model 3 – systems in competition



- producers must generally participate in one or more systems with all textiles
- Several systems in competition can be set up; require approval by the competent authority
- All information from producers, the systems, collectors, sorters, recyclers and the implementation of further requirements (communication, information, innovation) converge in the central register
- Specific and verifiable requirements for the systems are defined by law
- very specific and restrictive as well as verifiable requirements for self-collection are laid down by law
- Competitive systems can make a profit





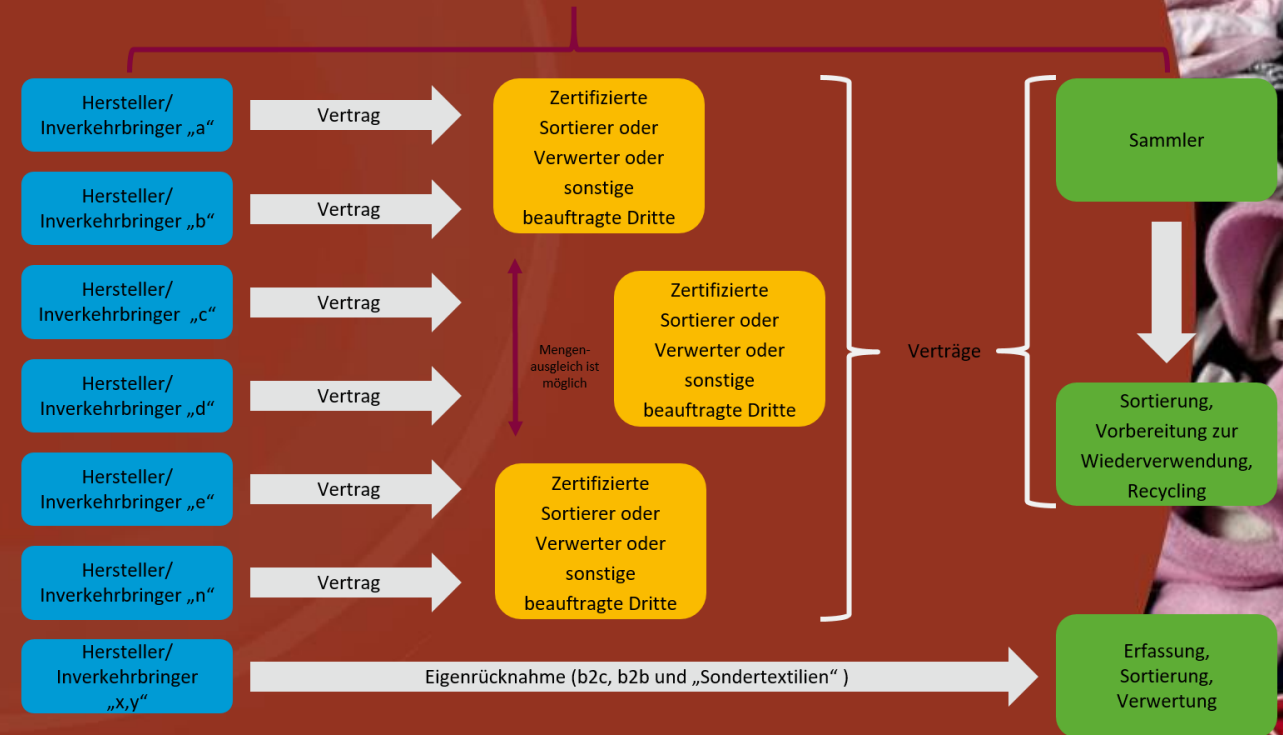
# model 4 – contract model



- very specific and verifiable requirements are laid down by law for producers, which must be verified by producers or by authorized third parties
- No specific organizational structures are defined by law; there are no system approvals or system participation obligations
- Each producer must choose its contractual partners and structure the contracts with third parties in such a way that the legal requirements are fulfilled
- All information from producers, collectors, sorters, recyclers and the implementation of further requirements (communication, information, innovation) converge in a central register; third parties can be commissioned

## Zentrales Register

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# Criteria for model analysis and discussion



## Implementation

- a) Practicality and complexity of implementation
- b) Required bureaucratic and organizational effort
- c) Control options
- d) Possibilities for sanctions

## Legal framework (EU)

- e) Consideration of the objectives of the EU strategy for textiles
- f) Compliance with the requirements of the Waste Framework Directive

## Infrastructure

- g) Building on existing infrastructure
- h) Comprehensive collection
- i) Strengthening preparation for reuse and recycling
- j) Consumer friendliness
- k) Involvement of non-profit organizations (social enterprises)

## Financial aspects

- l) Secured financing of all necessary services
- m) Ecomodulation when levying charges
- n) Cost-benefit analysis/proportionality

The models were evaluated on the basis of various criteria.

- = very positive
- = positive
- = neutral
- = negative
- = very negative



**Model 1 - Fund model:** less suitable; usually rated positively and neutrally; but extremely high bureaucratic and organizational effort



**Model 2 - producer-led model:** suitable; mostly rated positively and very positively; but antitrust aspects still need to be clarified



**Model 3 - Systems in competition:** suitable; mostly positively and neutrally rated; but ecomodulation is limited



**Model 4 - contract model:** significantly less suitable; predominantly negatively rated

# Next steps towards extended producer responsibility



Federal Ministry  
for the Environment, Nature Conservation,  
Nuclear Safety and Consumer Protection



- internal discussion of model proposals and decision in favor of a model by Federal Ministry for the Environment
- discussion of the proposals for the amendment of the WFD at EU level by the Federal Ministry for the Environment
- discussion and exchange with German Environment Agency on specific design of the selected model



# Questions, notes, comments?

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UBA-Texte 32/2022

UBA-Texte 146/2023



bvse 2020

