



SFA position on WFD: Advancing the Circular Economy of textiles

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ABOUT SFA AND STICA

The Sustainable Fashion Academy (SFA) is a non-profit organisation based in Stockholm, Sweden. SFA's mission is to exponentially accelerate progress towards science-based sustainability targets and the global sustainability goals (SDGs) by leveraging the power and influence of the apparel and textiles industries. To achieve this, SFA initiates research and analysis to inform better decision-making, inspires and educates change agents, and mobilises key stakeholders around issues needed to transform the industry, including policy, finance and accountability. SFA founded and coordinates the Scandinavian Textile Initiative for Climate Action (STICA), a platform for accountability and leadership. STICA's aim is to ensure the Nordic and EU apparel and textiles industries reduce their greenhouse gas emissions in line with what is required to stay within the 1.5°C degree warming pathway, while inspiring the global apparel industry to do the same. www.sustainablefashionacademy.org

EXECUTIVE SUMMARY

Waste prevention has been confirmed as a key priority within the European Green Deal (EGD) and the Circular Economy Action Plan (CEAP) by the European Commission. In July 2023, the European Commission released a legislative proposal to amend the EU Waste Framework Directive, which included the introduction of a mandatory Extended Producer Responsibility (EPR) scheme for textiles. Although SFA supports the idea of an EU EPR scheme for textiles, we also believe that the proposal misses several important aspects. The revised WFD does not mention the importance of circular business models or textile reduction targets and it does not place enough emphasis on defining clear end-of-waste criteria. Furthermore, the suggested EPR scheme falls short in prioritising waste prevention, which limits its effectiveness in addressing the issue of overproduction and tackling fast fashion.



INTRODUCTION

In Europe, a linear economy continues to be the standard practice. Therefore, this specific revision provides a rare chance to expand circular business models through policy changes while addressing significant problems such as resource overuse, overproduction and excessive consumption. A comprehensive transformation of how we extract, produce, and consume is essential, aligning the Waste Framework Directive (WFD) with circular and carbon-neutrality goals. To facilitate this shift towards a circular textile economy, we suggest several crucial improvements for the WFD revision:

1. Fostering garment redesign and circular business models through eco-modulation.
2. Advancing the implementation of textile waste reduction targets.
3. Creating clear end-of-waste criteria to enhance sorting and reuse.

ROLE OF ECO-MODULATION FEES IN RE-DESIGN OF GARMENT AND CIRCULAR BUSINESS MODELS

SFA and STICA members are committed to advancing a circular fashion economy, emphasising garment quality, durability, repairability and recyclability. Eco-modulation plays a crucial role in promoting sustainable design by offering a discount fee for the producers. To encourage better design, it's important that the rewards for sustainable choices outweigh the costs producers pay for environmental harm. This approach would make it economically unattractive to produce low-quality garments, potentially transforming the fast-fashion business model.

However, we propose looking at the eco-modulation fee not only as a product-focused measure but also as a catalyst for systemic change, incentivising the adoption of circular business models. To achieve climate objectives and ensure accessible sustainable fashion for all, models based on reusing and repairing garments are essential. Eco-modulation could be implemented when producers offer repair and reuse services, placing emphasis on more than just the durability of materials to extend the clothing lifespan. For instance, the eco-modulation fee imposed on producers could be determined by considering waste audit data, which includes information on textile quantities, the duration of service and recycling expenses.

Furthermore, EPR fees should encompass the costs of educating citizens about waste prevention measures, supporting reuse centres and facilitating preparation for reuse, take-back and collection systems. Despite significant industry investments in various



second-hand fashion services, these have yet to scale rapidly and widely enough to effectively reduce the environmental impact and resource consumption associated with the fashion industry.

REDUCING TEXTILE WASTE WITH ENFORCEABLE TARGETS

In light of the pressing issue of textile waste management, SFA advocates for the establishment of legally binding, quantitative targets for reducing textile waste at the EU level. This proposal aligns with the [EU Textiles Strategy resolution](#) and is consistent with the draft report of MEP Anna Zalewska, who suggests that the Council should set a target by December 31, 2030, for achieving a 2040 textile waste reduction goal. Furthermore, we propose that each Member State should adopt enforceable targets for prevention, reuse, and recycling of textiles

ENHANCING CLARITY AND SORTING EFFICIENCY VIA WELL-DEFINED END-OF-WASTE CRITERIA

One of the key points for the WFD will be adopting complementary measures to the EU Waste Framework Directive via EU end-of-waste criteria (EoW). A significant challenge lies in determining what constitutes a 'reusable garment' due to its subjective nature. In this context, we foresee the introduction of strict sorting guidelines within the EoW framework for second-hand garments. These guidelines will adhere to the waste hierarchy, guaranteeing that only garments in sufficiently good condition are considered for resale.

CONCLUSION

In conclusion, the revision must not merely manage the consequences of waste but also target the very origins of the escalating waste crisis and resource extraction. This demands a paradigm shift from waste management to a proactive strategy centered around waste prevention. Our collective responsibility extends to shaping a sustainable future for both the fashion industry and the environment. The proposed measures, including quantitative targets for textile waste reduction and well-defined End-of-Waste criteria, provide a tangible path forward. By embracing these changes and fostering circular business models, we have the potential to not only mitigate the environmental impact of the textile industry but also pave the way for a more sustainable and responsible fashion economy.



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