

To the European Commission Members.

Jan 23rd 2025

Subject : PETCORE EUROPE call to action on Effective ESPR Schemes to Drive Polyester Textile Circularity in Europe.

Dear Members of the European Commission,

PETCORE EUROPE, has continuously represented the polyester textile (PET) value chain for over 30 years. PETCORE EUROPE's policy recommendations have been instrumental in the realization of PETCORE EUROPE's leading position in the circularity of PET packaging primarily through recycling. PETCORE EUROPE seeks to bring the same successful implementation of circularity for textiles. To this end, PETCORE EUROPE is publishing a position paper on the forthcoming ESPR Ecodesign for sustainable products regulation, detailing how circularity through recycling and energy performance can be optimized for polyester textiles, leading to a strong, well-functioning single market for sustainable polyester textiles in the EU.

Our constructive approach on actionable measures significantly advance circularity through recycling, particularly post-consumer polyester garments and as we shall see later on EU post-industrial textile waste.

PETCORE's position highlights practical steps to a more sustainable textile industry competitiveness of recycling. By scaling up, we can promote the growth of European champions in the global market, reduce dependency on external resources, and build energy efficient, low-waste sustainable circular supply chains.

The economic and social impact of textile recycling is undeniable; it will generate employment, support local industries, and, **when scaled, become economically self-sustaining, ultimately minimizing the cost burden on garments:**

1. Recyclability and Circularity

POST CONSUMER Garments in the EU27 represent 85% of textiles waste.

- **Garments should be designed with recyclability** in mind, including clear and quantitative information on material composition. As previously successfully done for packaging, PETCORE has proposed collection guidelines and will prepare circularity guidelines.
- **We support the listing of hazardous substances** that may affect recycling and circularity, as proposed by the JRC.

- **The use of mono-material polyester textiles for mechanical recycling** should be promoted for mechanical recycling.
- **The simpler the structure of the garments is, the less costly it is to recycle.** PETCORE proposes the development of a platform modeled on the European PET Bottle Platform (EPBP) to provide recommendations for recycle-friendly structures.

2. EPR Systems

Key requirements for EPR schemes include ensuring full accountability for waste prevention, reuse, and recycling targets. **These schemes must provide financial support for the collection, sorting, preparation for recycling, and recycling.**

- We advocate for a **clear distinction between 'used' garments for reuse and 'waste' garments for recycling.**
- EU regulators should not only mandate collection but **also enforce the standardized sorting guidelines for recycling and circularity across all member states.**
- There should be **regulations to address the inappropriate export practices**, which create issues in the importing location while limiting supply for recycling EU recycling facilities. A strong emphasis must be placed on banning the export of unsorted clothing.
- The European Commission must **implement rigorous monitoring systems** to track and ensure the success of EPR schemes.

3. Incorporation of Recycled Content

To decrease dependence on virgin fossil-based materials:

- **We propose mandating a minimum of 20% recycled content in garments**, specifically post-consumer recycled polyester, by 2030.
- **We strongly recommend that the recycled content comes from European waste garments**, this measure will promote the EU recycling industry.
- **We recommend including the recycling of EU industrial waste**, which, unlike packaging, remains largely unrecycled today.
- Also, to limit the export of locally depolymerized new resources, PETCORE proposes developing a **“Polymer Circularity Concept”** that can be effectively used by the packaging sector.
- **Mandatory traceability and certification by independent third parties of recycled content should be implemented**, ensuring a reliable chain of custody and supporting existing initiatives such as the “Textile Exchange” organization.

4. Transparency and Digital Product Passports (DPPs)

The textile industry employs around 8,000 chemical products, including 450 substances known to threaten health and the environment.

- We support the initiative about **Polyester textiles which should include a Digital Product Passport (DPP)** that provides meaningful information on the product's environmental footprint, composition, repairability, and recyclability. This will enhance transparency for consumers and recyclers, offering clear insights into production methods and the lifecycle impacts of garments.

5. Carbon Footprint Reduction

Mandates should be introduced to **reduce embedded energy and greenhouse emissions in the production of polyester garments. Depolymerization** lowers the environmental impact of polyester compared to based monomer, **typically reducing CO₂ emissions by at least 70%.**

6. End-of-Life Management

- We support **mandating producer responsibility for garment take-back schemes** and ensuring proper traceability for upcycling.
- EPR schemes should establish **clear and accountable incentives to address an undocumented textiles waste sector.**
- Efforts should also **focus on reducing textile exports** to the Global South and minimizing textile waste sent to landfills or incineration. A firm ban on the export of unsorted clothing is essential.
- It is important to recognize that enhanced Life Cycle Assessments (LCA) lead to higher Life Cycle Costs (LCC), which, however, should be evaluated in relation to the recycled content.

7. Consumer Engagement and Eco-Labeling

Clear and standardized eco-labels indicating environmental performance should be implemented to help consumers make informed choices. This would also promote sustainable consumption patterns and discourage disposable fashion.

In summary

We stress the pressing need to improve collection efforts, establish mandatory EU-wide harmonized sorting guidelines, implementation of the pre-processing infrastructure to convert collected textile waste to consistent usable feedstock both, mechanical recycling and depolymerization processes.

These critical measures are vital for securing the viability of recycling facilities, ensuring the industry can achieve the ambitious targets set by the ESPR Ecodesign framework.

