

# Post-Consumer Textiles:

## Lessons Learned and Guidelines for Municipalities

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Successful textile management in Europe requires a regular flow of consistent and reliable data, clear direction from the national level and close cooperation between municipalities and textile managers. Clear direction and good data is not always available, but municipalities must act now to be ready for separate textile collection in 2025 and forthcoming EPR across Europe.

This document shares some basic lessons learned and simple guidelines for any municipality and their textile partners to take action. It was developed over the past 12 months by municipalities Saku and Lääne-Harju in collaboration with Humana and TEXroad as we work to improve textile circulation in Estonia. Insights from the Netherlands are also included.

### **New obligations for textiles**

Amendments proposed to the EU Waste Framework Directive (WFD) in July, 2023 put a high importance on textile waste management and call for a harmonized Extended Producer Responsibility (EPR) system across Member States. The proposed changes place heavy responsibilities on companies who put textile products on the market, including establishing Producer Responsibility Organizations (PRO), organizing textile management and paying for the system.

The Dutch and French textile EPR systems and the recently proposed WFD amendment all make local authorities, waste managers and current textile collectors an integral part of the textile infrastructure. We believe national textile management systems should include both publicly tendered and privately operated activities, and optimise the system for local conditions.

National level public authorities must ensure the PROs are meeting their obligations and reliable information on textile management is reported and available. They must also set a clear direction for local authorities, as municipalities have general waste management and reporting obligations and need clarity on specific requirements and available resources for textiles.

Municipalities cannot wait to take action, even if national direction is not available. Thankfully, the first steps to take are well within municipality authority and build a foundation for success.

### **First steps for municipalities**

- Map the current textile collection and management system in your area

Good data is the shortest route to success



**HUMANA**



- Regularly gather quantity and flow data from textile collectors and sorters in your area
- Collaborate with collection partners and other municipalities to progress faster
- Engage ministries and other national level authorities to address data issues and co-create the direction for a national textile management system

### Why textile data matters

Textiles require a completely separate collection system from other waste. They are a technically challenging material to sort for reuse and recycling, and the economic incentives to drastically increase collection, reuse in Europe and fiber to fiber recycling are not yet strong enough. Citizens must also be engaged in order to make the system work.

Pressure is increasing for municipalities and collection partners. Good data is needed to quantify what is and is not working, make effective changes and measure progress. This is true at the local and national levels. For example:

1. The amount of textiles in the area impact the type of infrastructure and size of the investment needed to improve management
  - A. Includes options for local reuse and repair services
  - B. Includes facilities and equipment that should be prioritized for national subsidies
2. EPR fees paid by producers are meant to cover the actual costs of collecting, sorting and redistributing textiles, so accurate data is needed to
  - A. Set up the system according to local and national costs and conditions
  - B. Provide evidence of textile management activities for EPR fund payments
  - C. Make adjustments to fee structure as system develops
3. Textile flow information at a local level highlights opportunities and problem areas at the collection stage
  - A. Underserved and overserved areas that should be addressed
  - B. Municipalities that can lead by example
  - C. Municipalities who are lagging that may need extra support to improve
4. Citizens are the starting point for good collection
  - A. Need guidance for where, what and how to drop off items for reuse and recycling
  - B. Need transparency to participate and to adopt better textile consumption habits





## Map the system and gather quantity data

Municipalities and our collection partners must take the first steps by mapping what is currently happening and quantifying basic textile flows. Municipalities have waste management obligations, so we need to know the current state of textiles and what is possible moving forward. Textile collectors and sorters need to carry out activities in an economically viable way and help municipalities and PROs understand what options are available at the local level.

1. Municipalities: map the current system
  - A. How much textile waste are we responsible for, and how is this measured?
  - B. Who are the textile management actors, and what are their activities?
  - C. Where are the collection points?
  - D. What collection contracts are under our authority?
  - E. What are the reporting requirements for those contracts?
  - F. How much textile is being collected monthly or quarterly?
  - G. What is the ultimate destination of the collected materials?
  
2. Textile collectors and sorters: track and report
  - A. Collection point locations, including containers, shops, events, and areas serviced with door-to-door collections
  - B. Quantities collected per container location (kg)
    - Ideally, data is available per pick up
    - When detailed information is not available, good starting points are
      - Weekly or monthly totals per collection point, or
      - Daily totals for a collection route and a list of specific containers on the route
  - C. Quantities collected in shops, at events and through door-to-door collections
    - Quantities should be recorded regularly (e.g. per event, daily, weekly)
    - Ideally, data is collected by weight
    - Units should be consistent over time for each collection method
  - D. End points of sorted materials on a monthly or quarterly basis
    - Reuse in EU
    - Reuse outside of EU
    - Export out of EU before sorting
    - Recycled – Fiber to fiber in EU





- Recycled – Fiber to fiber Export
- Recycled – Fill / wipers / insulation in EU
- Recycled – Fill / wipers / insulation Export
- Waste
- Shoes and accessories must be tracked separately from textiles
  - An estimate can be made from monthly or quarterly sorting totals

Much of the information needed by local authorities and textile managers is the same, though the level of detail is different. Textile managers can use detailed collection quantity and location data to inform business decisions, while local authorities typically need monthly quantities for each collection point and mass balance estimates for reuse, recycling, and waste.

Collectors and municipalities should expect collection totals at a municipal level to be required information in forthcoming policy monitoring systems. Sorters should expect all of the items under 2.d above to be required to access EPR funds.

#### Challenges for data collection

1. Some textile managers have really detailed data tracking on collection points and over all quantity by weight
2. Some textile managers do not regularly measure the amount of textiles collected in shops or in other areas of their business
3. Some textile collection methods are easier to track quantities than others

#### Solutions to challenges: Municipalities

1. For partners or collection locations with reporting challenges, identify what can be measured, what the appropriate measurement unit is, and start collecting this data monthly or quarterly
2. Define the best method for converting the measurement unit into weight convert data
3. Work with partners to improve accuracy and efficiency of these measurements over time

#### **Using the map and materials data**

1. Municipalities: Identify our needs
  - A. What are collectors already doing, and what is missing?
  - B. What can we do as local authorities?
  - C. What more do we have to do to support collection and reuse?





- D. What is the estimated amount of post-consumer textiles and other textiles waste that we are responsible for?
2. Municipalities and partners: Metrics and upgrades for our local infrastructure
  - A. Compare the estimated total amount of textiles in our area to quantities collected
  - B. Note the current number of collection points per person and per square km
  - C. Quantify amounts collected with the current collection points
  - D. Set 1st metrics for collection quantities
    - Consider the types of collection points appropriate for your area (e.g. bins, events, door-to-door)
    - Consider number of collection points needed in the short term and over time
    - Consider what is feasible with available resources and end markets
3. Looking ahead
  - A. Use answers to 1.a, 1.b and 1.c above to guide focus areas, project planning and data analysis
  - B. Analyze data collected over time to identify what's working and potential infrastructure updates
    - Identify underserved areas that are appropriate for new collection points
    - Identify underperforming collection locations that may be adjusted
  - C. Use data and metrics to inform citizen communications and influence behavior

### **Partnerships with neighboring municipalities**

Being well informed about the current state of textiles and having the data as evidence over time helps us work together with other municipalities, our partners and national authorities. We cannot work alone to address textile waste. We must do it together.

1. Benefits
  - A. Learn from one another
  - B. Pilot projects are done together, which makes them bigger and easier to do
  - C. Municipalities' voice is stronger when talking together
  - D. Better ideas are developed across a bigger team
2. Challenges
  - A. Needs and priorities may be difficult to align, especially between higher density cities and rural areas





- B. Timelines for decisions and action may differ and reduce ability to collaborate
- 3. Solutions to challenges
  - A. Find project opportunities that allow mutual interests to be tested
  - B. Focus on shared goals to find better alignment
  - C. Remain in contact monthly or quarterly to catch up on individual progress and find the next opportunity to work together

### **Engaging the national level authorities**

Member states have different levels of readiness to address textiles. In order to have the best outcome, municipalities must align with one another and collaborate with textile management partners. Ideally, this is initiated by national level authorities. If this is not the case, municipalities and their partners should take the steps below and present the outcome to the national level.

- Discuss individual needs, challenges and data and identify the main opportunities and challenges for textile management in the country
  - Prioritize shared needs and challenges for the majority of municipalities
  - Identify specific issues for urban vs. rural areas
  - Highlight important concerns of collectors and sorters
  - Quantify problems as much as possible
- Review national data and information systems that are creating roadblocks
  - Identify issues within official statistics
  - Identify tools or other resources that need improvement or are missing
- Define municipality expectations for guidance and support
- Engage national authorities (if needed)
  - Clear definition of needs and challenges for municipalities and textile partners
  - Prioritised list of issues and specific local considerations, including quantifications
  - Outline of challenges with national data and other resources
  - Request for specific guidance and support

