Threads of Transparency
Policy Brief
2023
Threads of Transparency

Voice Of Irish Concern for the Environment, established in 1997, is a registered charity supported by public membership, provision of services, donations and bequests. VOICE: CHY 13196 and CRA 20040437. We are a Company Limited by Guarantee, CRO275127.

Contact
info@voiceireland.org
+353 1 642 5741

www.voiceireland.org

VOICE
9 Mount Street Upper
Dublin 2
D02 K659
Republic of Ireland

Social Media
@voiceireland
(X: @VOICE_Ireland)

Written by Solene Schirrer, VOICE Project Manager
## CONTENTS

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contents</td>
<td>1</td>
</tr>
<tr>
<td>Executive Summary</td>
<td>4</td>
</tr>
<tr>
<td>Introduction</td>
<td>5</td>
</tr>
<tr>
<td>I) Lack of definitions and confusion upon activities in the sector</td>
<td>9</td>
</tr>
<tr>
<td>Specific Recommendations</td>
<td>11</td>
</tr>
<tr>
<td>II) Transparency for better waste management</td>
<td>12</td>
</tr>
<tr>
<td>Specific Recommendations</td>
<td>15</td>
</tr>
<tr>
<td>III) Opportunity for enhanced separate collection</td>
<td>16</td>
</tr>
<tr>
<td>Specific Recommendations</td>
<td>18</td>
</tr>
<tr>
<td>IV) Opportunities: case for an Indigenous national sorting facility</td>
<td>19</td>
</tr>
<tr>
<td>Specific Recommendations</td>
<td>21</td>
</tr>
<tr>
<td>Conclusion</td>
<td>22</td>
</tr>
<tr>
<td>Annexe 1: Glossary of terms</td>
<td>23</td>
</tr>
<tr>
<td>Annexe 2: Glossary of activities</td>
<td>26</td>
</tr>
<tr>
<td>References</td>
<td>28</td>
</tr>
</tbody>
</table>
EXECUTIVE SUMMARY

This document provides an overview of the Post Consumer Textile (PCT) waste management and policy landscapes in Ireland. We identified several gaps in the industry, which need to be addressed in order to advance the management of this material.

Our goal here is to draw a line between national REUSE channels and textile waste management. We firmly believe that all discarded textiles are waste unless proven otherwise.

Clarity and transparency are our guiding stars. We insist on basic regulations to identify and treat textile waste. This foundation is essential for any further work on finding the best separate collection methods, enhancing re-use and recycling, all while taking responsibility for our waste. We aim to give a framework to the sector through clear definitions and harmonised rules regarding transparency.

We propose key recommendations throughout this paper to drive positive change towards a more circular economy. Through this policy brief, we wish to build on the wonderful work already being done by fantastic actors in the space and support actions to achieve targets set out in the Waste Framework Directive and already acknowledged in the Waste Action Plan for a Circular Economy.
INTRODUCTION

The exponential growth of the global textile industry over the past two decades has led to an alarming increase in its environmental impacts, ranking it as the 4th most impactful, 3rd – highest pressure on water and land use, as well as the 5th highest use of raw materials and greenhouse gas emissions in 2020.

This expansion of the industry has also resulted in a concerning surge in post consumer textile (PCT). In just 20 years, the number of garments produced worldwide has skyrocketed from 50 billion in 2000 to a staggering 100 billion annually, with an average lifespan of a mere 3 to 3.5 years before they are discarded, further exacerbating the environmental impact. These figures highlight the unsustainable consumption patterns and the pressing need for better regulations on post-consumer textiles. Currently, only 15% of PCT waste in the world is collected separately, and less than 1% of the global production is recycled into new textile products. Due to increasing use of synthetic fibres blends in textile production, PCT has now become the third-largest contributor to plastic waste generation, accounting for 13% of all plastic waste, while making it more challenging for recycling processes to break down fibres.
To address these challenges, the European Union has developed a strategy for sustainable and circular textiles. The sector has been identified as a “priority sector” in which the EU can pave the way towards a carbon neutral and circular economy. The Strategy sets out several goals and an action plan to promote sustainability in the sector. These goals have also been addressed through the targeted revision that the Waste Framework Directive is currently undergoing. It includes promoting sustainability and reducing the environmental impact of textile and clothing products throughout their life cycle (from stricter eco-designs to better handling of waste). Supporting this revision, the Joint Research Center has conducted multiple studies and consultations since 2020 on the EU textile and recycling market to make recommendations for improvement. The existing target for separate collection by 2025 will be maintained and reinforced, with member states paying particular attention to the collection and proper handling of textile waste. The main contribution of this revision is the proposition of a mandatory EPR (Extended Producer’s Responsibility) for all state members to take on the issue of textile waste management. These regulations and measures will have to be implemented in all concerned countries to mitigate the local and global environmental impacts of this ever-growing flow of textiles.

Ireland, like many other countries, has been significantly impacted by overconsumption and fast fashion. On average, each person in the country discards approximately 35 kilograms of post-consumer textile annually. This unprecedented volume of discarded textiles highlights the urgent need for enhanced regulations and sustainable practices to address this environmental challenge effectively. The situation is really concerning, as evidence gathered by the EPA show that 65% of textiles are directly treated as general waste, ending up landfilled or incinerated, as illustrated by Figure1.
Figure 1: Irish PCT sector each year.

170,000 tons of post-consumer textile = 28 kg per capita

Post Consumer Phase

- Waste: 110,000 tons
  - 64,000 tons from households
  - 46,000 tons from other (professionals, industrials...)

- Collected: 60,000 tons
  - Charity shops: 23,000 tons
  - Resold/Reuse locally: 12,000 tons
  - Commercial collectors: 37,000 tons
  - Unclear (rationally repurposed...): 3,000 tons
  - Exported (estimated): 45,000 tons

- Incinerated or Landfilled: 7.05%

64.7%

35.3%

This stream is the only one that proves reusing clothes, diverting the waste from landfill and incineration

Source: Voice of Irish Concern for the Environment
The goal of this paper is to build a case for better regulations on the PCT sector in Ireland, based on current knowledge. VOICE believes that a certain level of basic and homogeneous regulations is necessary to undergo any further policy work in the textile sector.

**8 YEAR ROADMAP**

**PCT waste in Ireland**

- **2023**
  - Fund awareness campaigns

- **2025**
  - Fund awareness campaigns
  - Mandatory separate collection
  - WFD revised with a mandatory EPR for member states

- **2030**
  - Fund awareness campaigns

- **2023**
  - Develop clear and standardized definitions encompassing all activities and actors.
  - Publish a comprehensive glossary to help stakeholders use consistent terminology.
  - Categorize commercial collectors as waste managers

- **2025**
  - Legislation mandates separate collection, transparency and traceability across the PCT value chain.
  - Reporting requirements have been enforced
  - Collaboration with LAs to implement adapted textile collection methods.

- **2030**
  - Establish an indigenous sorting facility for post-consumer textiles, in collaboration with charitable organizations and industry partners.
  - Establish an EPR that includes repair and reuse as its primary goals and sets ambitious targets.
In Ireland, the collection of clothes is led through various streams, depending on the collectors involved. Most textiles are treated as general waste and will typically be dispose of through the bin collection system, which will end up incinerated or landfilled. Charities, as highlighted in Figure 1 represent the only Re-use stream (as they prove that the clothes are effectively reused), focusing on reselling pre-sorted, high-quality textiles in their second-hand shops. The remaining collected textiles, typically by commercial collectors/handlers (cf. glossary), are sold to European wholesalers specialised in sorting clothes, that will then trade them on global markets. Due to the surplus supply of low-quality products in the EU, an increasing amount is exported to East Asian and African countries. Although under EU waste shipment law, shipments of hazardous waste and waste destined for disposal are prohibited to non-OECD countries outside the EU, the lack of definition around post-consumer textile waste inhibits this regulation from being properly applied and gives an easy way out for exporters by labelling their shipment as “reusable”. As a result, many of these products end up becoming solid waste, clogging rivers, greenways, and parks, creating additional environmental and health problems for the countries and people that have to deal with our waste. Each country has the responsibility to regulate its own waste stream to prevent transferring waste to countries ill-equipped to handle it. It is essential to reduce waste through prevention, promote reuse and repair options to extend garment life cycles, and ensure transparency in the management of textile waste.

We want to underline that Reuse and Reduction of production as well as consumption are the main priority for future policies, respecting the waste hierarchy. Though, the current reality is that 65% of PCT is treated as general waste, ending in landfill or incineration. Additionally, only 7% of the 35% that is collected can effectively be considered reused so far. This shows a clear mismanagement and lack of regulations to offer a proper end-of-life management for textiles.
It is assumed that textiles, in the same way as glass, is the responsibility of Local Authorities. Though, gaps can be identified from this initial, only rule:

Some Local Authorities, when mentioning textiles (which is not systematic) do not have clear definitions of textile waste, what it constitutes and therefore how to deal with it. Yet, they are supposed to be the main entities responsible for its collection. An example is the Eastern Midlands Region’s Waste Management Plan (2015 – 2021). In the list of terms, textile is considered as a Biodegradable Municipal Waste (BMW), which not only is wrong, but also is the only time textiles are mentioned in the plan, failing to mention the proper collection method or stream it should be going through.

Another example of problems that arise from the lack of definition on activities related to PCT is the term “commercial recyclers”, used to designate the activity of collecting clothes and processing them for export. This activity in itself should not qualify as recycling or Re-use, since there is no proof of actual recycling (in a closed loop) or of actual reuse. And yet, these businesses use those terms that don’t have an official definition, misleading people on the nature of their activity and the future of donated clothes.

At VOICE, we believe that clear and homogeneous definitions should be set, in order to avoid loopholes and guarantee transparency for everyone to know what happens to their clothes when disposing of it. We consider all post-consumer textiles as waste unless proven otherwise, aligning with the EU’s Waste Framework Directive proposed revision that want:

“Member States shall ensure that used and waste textiles, textile-related and footwear products that are separately collected in accordance with Article 22c(5) are considered waste upon collection.”

A crucial point of these definitions will be to draw a clear line between reuse streams and waste streams, as well as who does what in the sector. An exemption or tailored permit for the Reuse sector (with lighter requirements) should be granted, solely to entities capable of proving that a substantial percentage of clothes is effectively reused (a quantifiable metric that necessitates definition) nationally. This proof of effectively reused items is essential to draw the line between the Reuse sector and the waste management one. Presently, within the Irish context, a prime example of a reuse stream is the notably advantageous operations of charity shops. Their ability to demonstrate a considerable rate of clothing reuse could exempt them from classification as waste handlers.
RECOMMENDATIONS

Establish Clear Definitions
Develop clear and comprehensive definitions for the PCT sector, including waste streams, reuse, recycling, and all activities involved. They should be based on recognized standards and best practices, taking into account the entire lifecycle of textiles.

"VOICE proposes an indicative glossary of terms and of activities. The leading concept being that all PCT is waste unless proven otherwise.

Separate Reuse and Waste Streams
Strict definitions should not impair the ability of the Reuse sector to develop their activity by miscategorising them. Reuse activities should also be defined and exempted from waste management regulations.

Regulate Waste Streams
Priority should be given to sorting and preparing for Reuse, to draw a clear line between what is now Reused by setting End-of-waste criteria, and what is going down the chain as waste for recycling...

"Those criteria should be based on EU legislation/studies and the expertise from the charity retail sector.

Set Reuse and Recycling targets:
Set targets to increase the percentage of textiles that are successfully separately collected AND reused or recycled, rather than being treated as general waste.

"This could lead to a set date to a ban landfill or incineration of textiles

Commercial Collectors as Waste Managers
To clarify the status of commercial collectors involved in PCT handling, we recommend to explicitly categorise them as waste managers. This classification would help establish a consistent framework for their operations.

"Commercial textile collectors should systematically fall under the National Waste Collection Permit Office (NWCPO) authority.
Although establishing clear definitions is a necessary first step, it will not solve the issue of poor textile waste management on its own. More regulations are needed to enhance transparency in the sector and offer better options to people.

II) Transparency for better waste management

Transparency and traceability in the textile industry have become crucial priorities in recent years. The objective is to effectively manage value chains, “address labour and human rights violations, mitigate environmental impacts, combat counterfeits, and embrace sustainable production and consumption patterns” (UNECE). While progress is being made, the focus on transparency and legislation often stops at the point of sale, disregarding the complex international supply chain that post-consumer textiles go through. However, mismanaged textiles contribute to a wide range of social, economic and environmental issues, but the lack of clear evidence as to where they end up is limiting the development of effective solutions.

The PCT streams are currently very blurry in Ireland. There is a multiplicity of stakeholders involved, without a clear idea of how many, nor to what standards they comply to, since there is a grey area in national legislation.

The EPA’s report states that “commercial banks are currently the largest source of separately collected textiles in Ireland.” The same study underlines multiple gaps in terms of transparency in the operations surrounding PCT collection, specifically the apparent problem of commercial bring banks and collectors, explaining that there was a lack of transparency in regard to partnerships with charities, misleading information or simply absence of the destination of collected clothes.
After that, the Charity regulator published a clothing collection public note in March 2021, that outlines the required information for bring banks that are partnering with charities to display as following:

- The registered charity’s name, logo, Registered Charity Number and contact details. Add those of the service provider if there is one (phone, email and website address).
- Brief details of what will happen to your donation: donation might be going directly to the people that the charity assists or the clothes and other items that you donate might be sold or recycled to raise funds for the charity instead. What will happen to your donation should be made clear.
- The benefit the charity will receive from the donation.

While transparency requirements are outlined in this note, they only pertain to a fraction of clothing labels and clothing banks collections specifically those operating in partnership with charitable entities.

Notably, it does not encompass non-affiliated commercial collectors nor local authorities. This underscores the necessity for a unified regulatory framework to ensure fairness and transparency across the sector. Furthermore, there are no consequences in the form of charging fees for non-compliance. To further enhance transparency, it is necessary to extend the criteria to cover all entities involved and expand the disclosure to include detailed information on the destination and end-use of donations, going beyond the generic terms of "sold or recycled" that can lack clarity.
Seeing that 75% of all collected clothes are exported abroad, it is necessary to enforce stricter regulations around the export stage. In recent years, it has been increasingly documented that an increasing amount of textile waste is exported to the Global South in the guise of reuse, precisely because of the lack of regulation around the export of PCT.

As the EEA report states:
“"There is little research or information on the actual reuse rate in the receiving countries, the share of used textiles that ends up as waste, and the specific waste management systems and their abilities to handle the used textiles that cannot be reused in a sustainable way. Both the EU and the destination countries need to address the challenges around the growing amounts of exported used textiles and the overall uncertainty about their fate."

Figure 2: Global second-hand market.

The Waste Framework Directive (WFD) proposed revision suggests a mandatory sorting of separately collected used textiles before export (Paragraph 7 and 8, Article 22d) and that shipments of used textiles would require documentation that demonstrates suitability for reuse. This would help bring more transparency for people who donate their clothes and ensuring basic regulations to make sure that the activity of those businesses doesn’t harm communities at the end of the line by exporting waste.
RECOMMENDATIONS

Extended Transparency Requirements at collection points

Expand transparency requirements outlined by the Charity Regulator to cover all PCT collection methods, including commercial banks, take-back schemes and local authorities. This should include the disclosure of the registered organisation’s details, contact information, and the intended destination and end-use of the donated textiles.

*These should be prominently displayed at the point of collection, with additional information available on the organisations’ websites or provided upon request.

Mandatory Reporting of Activities

The government should establish a mandatory reporting framework for all entities involved in textile waste collection and management including the quantity of textiles collected, the destination and end-use of the collected textiles, and a description of what exported stocks. The reported data should be publicly accessible.

Penalties for Non-Compliance

To ensure compliance, the government should establish penalties for entities that fail to provide the necessary information in the form of fines or other forms of enforcement action to encourage adherence to the regulations.

Stakeholder Collaboration

The government should facilitate collaboration among stakeholders, in their effort to comply with new requirements to establish best practices, and guidelines for transparency and traceability in the post-consumer textile sector.

Though our recommendations target commercial recyclers primarily (as the “largest source of separately collected textiles”) we want these to apply to all textile collectors of the waste stream (with particularities regarding the reuse sector) like local authorities, who will play a crucial role in the development of mainstream separate collection for textile.
III) Opportunity for enhanced separate collection

The alarming statistic of 65% of all PCT going directly to landfill and incineration shows the need for better textile collection methods. An improved offering of textiles collection could support feedstock for reuse, recycling while reducing landfill and incineration, minimising contamination, and encouraging responsible consumer behaviour. Enhancing the Irish separate collection of textiles will require a pluralistic approach.

There is a strong case for the establishment of more bring banks as an ideal way to organise textile collection. A two-stream approach, separating textiles for reuse and recyclables, is supported by the EPA’s National survey on attitudes and behaviours towards textiles, which revealed that 78% of people are willing to sort their unwanted clothes into categories of “good for resale/reuse” or “good for recycling.” By implementing this approach, the reuse stream can be partnered with charities, ensuring that textiles suitable for second-hand use are directed towards social benefit. Such partnership is already found in other waste streams such as food waste. We could imagine something like Food Cloud, an initiative that has managed to redirect excess of food to charities in a stream that has a limited timeframe. The remaining textiles can be collected and brought to a centralised national facility (see part 4) equipped for sorting and preparing them for either reuse or recycling. Additionally, there is potential for these separate collection methods to be included within an EPR scheme, whereby part of the producers’ fee is directed to supporting the cost of the collection of their goods.

This action should involve primarily the local authorities (including WERLAs), through enhanced partnerships with charities and a potential public national facility working as sorter, with targets to maximise re-use or the most suitable form of recycling.
It is important to note that while this option works well for urban areas and can ideally be situated in dry places like malls, municipalities in rural areas should have alternative collection options available for whom textile banks can pose issues of maintenance and cleanliness. We could imagine deploying mobile collection units in each county, such as trucks or vans, to different neighbourhoods or events that can facilitate the collection of textiles such as bii-annual collections could be considered in some counties/towns.

In-store take back containers offer another avenue for textile collection, but they have to be approached cautiously. It is essential that these schemes operate in partnership with local charitable organisations to maximise social benefit. Without such partnerships, there is a risk of unintended consequences. Take-back scheme are faced with the same critics as the commercial collectors, simply exporting the clothes to “sorting facilities” that either destroy the clothes or sell them outside of Europe. Additionally, such schemes incentivize more consumption by offering coupons or benefits to customers returning clothes, which runs counter to the goal of limiting consumption, while the company getting financial benefits selling the clothes for export. Collaboration with charities like the existing one between TK Max and Enable Ireland ensures a focus on reuse, social benefits, and responsible disposal practices.
RECOMMENDATIONS

Mandatory Separate Collection

Implement a mandatory separate collection stream for post consumer textile waste in each county by 2025, as required by the Waste Framework Directive (WFD, Article 12b DIRECTIVE (EU) 2018/851)

This could lead to a ban on textiles from the general waste bin, landfill and incineration as mentioned by the Waste Framework Plan for a Circular Economy (p.44)

Governmental support for Implementation

The government should provide support to local authorities (LAs) by creating a comprehensive document outlining preferred methods for textile collection in different areas (urban/rural). This document should be based on existing research and cross-analysis of successful practices from overseas.

*By providing clear guidance and best practices tailored to the unique needs of Ireland, the government can assist LAs in implementing effective and efficient textile collection methods that align with sustainability goals.

Transparency and Reporting

Require municipalities, commercial collectors, and take-back schemes to provide information on the fate of collected clothes. This information should be checkable, and could be presented in an annual activity report.

Citizen Information and Awareness

Fund comprehensive citizen information and awareness campaigns (from LAs) to educate the public about the importance of separate collections for textiles.

By implementing these recommendations, Ireland can significantly enhance the separate collection of textiles, increase recycling and reuse rates, reduce landfill and incineration, and promote indigenous sorting facilities to ensure a higher reuse/recycling rate.
IV) Opportunities: case for an Indigenous national sorting facility
There is a significant opportunity for Ireland to establish its own indigenous sorting facility to address the challenges of post-consumer textile (PCT) treatment. While prioritising reuse is essential, it is evident that relying solely on charitable organisations may not be sufficient to effectively manage the additional large volume of post-consumer textiles (PCT) captured once the previous recommendations are implemented. By leveraging the expertise of these organisations and fostering partnerships between stakeholders, Ireland can design and develop a new sector that enhances the circular economy and recycling efforts.

A recent study led by Fashion for good builds a solid case for the development of separate collection, sorting and recycling in European countries. This comprehensive study conducted across 6 EU countries revealed that 74% of textiles could be recycled in a closed loop (fibre-to-fibre), equivalent to nearly 500,000 tonnes. This is an opportunity to generate 74 million euro annually in the recycling sector, when only 2% of PCT is currently being recycled fibre to fibre in Europe.

The results of the study underscore the opportunity for Ireland to develop responsible sorting channels to enhance the circular economy and recycling. There is a need for skilled sorters that will prioritise sorting textiles for both resalable and reusable purposes and prepare the remaining stock for recycling. The EPA also supports the development of post-consumer textile handling and processing in Ireland to both increase Reuse within the country with good supply and the potential markets and employment opportunities in reuse but also repair and recycling.

Significant progress has already been made in this direction, with Finland enhancing its post-consumer textile waste collection following the 2021 legislation mandating textile collection by local authorities from households and businesses, leading to the establishment of the Paimio recycling plant in the same year, which now handles 10% of collected textile waste. This success has ignited an even more ambitious project called Telavalue. This venture involves public research in collaboration with six textile companies, with the aim of enabling Finland to establish its own sorting and processing facility for more effective treatment of post-consumer textiles. This innovative model in Finland can serve as inspiration for Ireland to establish a similar public-private partnership network, fostering quality sorting and prepare for reuse, or even recycling, promoting the circular economy, and creating new employment opportunities.
Irish experts like Gwen Cunningham are working on the development and commercialization of innovative technologies such as The Fibersort project. This technology automates the sorting of post-consumer textiles by fibre composition, enabling consistent input for textile-to-textile recycling. Though, it is clear that this recycling enterprise cannot be completed entirely in the country. Ireland should commit to working with European partners in order to keep and treat as much textile as possible within Union. To drive greater circularity in the European textile industry, two open digital platforms: Reverse Resources and Refashion Recycle, have already been created. They enable connections between waste handlers/sorters and recyclers.

**Specific recommendations**

**Set Reuse and Recycling Targets**

Establish clear and measurable targets to sort for reuse and recycling of textiles. These targets will provide a framework for progress, drive efforts towards sustainable textile management, and allow for monitoring and evaluation of performance.

**Law on separate collection for textiles**

Draw inspiration from the 2021 Finnish law on separate collection (including for businesses producing textile waste). It should comprise the provision of a sufficient number of regional reception points for textile waste, with a focus on preparing as much of the collected waste as possible for reuse or high-quality mechanical recycling.

**Foster Collaboration among Stakeholders**

Encourage collaboration and cooperation among charitable organisations, industry experts, government bodies, and other stakeholders. Facilitate platforms for knowledge-sharing, joint initiatives, and the development of effective strategies for PCT collection, sorting, and recycling.
Allocate resources and invest in the necessary infrastructure for efficient sorting and processing facilities. These facilities will play a vital role in enabling the circular economy by effectively separating textiles based on their reuse or recycling potential.

*The infrastructure should be designed to handle different textile types and ensure safe and environmentally sound practices throughout the sorting and processing stages.

**Conclusion**

By implementing these recommendations, Ireland can make significant progress in promoting sustainable textile practices, reducing waste generation, and advancing the circular economy in the textile industry. The achievement of targets, investment in infrastructure, enhanced traceability, and collaboration among stakeholders will collectively contribute to the transformation of the PCT treatment sector towards more environmentally responsible and socially beneficial practices. Implementing such regulations will help prepare a strong basis, with reliable data on the activity when the country will be required to have separate collection and put an EPR into place.
Annexe I: Glossary of terms

Downcycling:
Any work done to textile waste that reduces its value is classed as downcycling, and mostly relates to the stepping down of a material’s function i.e. from clothing to rags. It can also be called recycling in an open loop, meaning it is used for different applications. This option is less interesting than recycling in a closed loop because there is little chance that the material can be recycled again after that operation.

Landfill
The practice of disposing of (textile) waste by burying it in designated landfills involving placing them in landfills where they will remain for an extended period, contributing to potential environmental hazards and resource wastage.

NB: Landfilling textiles is typically considered the least desirable option in terms of sustainability and environmental impacts.

Post-consumer textile export:
A waste stream for textile discard where textile waste is exported to another country, and is witnessed as large, wrapped bales. It is rare to have used textile imports in developed Western countries.

NB: the WFD proposal puts forward mandatory sorting of separately collected used textiles before export (Paragraph 7 and 8, Article 22d) and want to impost documentation requirements demonstrating suitability for reuse upon shipment.

Post-consumer Textile (PCT) waste:
Textiles that have been disposed of after consumption and use by the citizens or end-users in commercial and industrial activities. It can therefore be divided into two types:
- Household PCT: Apparel, garments, home textiles (bed linens, carpets...)
- Commercial/Industrial PCT: hospitality, health sector, automotive applications...

NB: Prioritizing reuse, recycling, and upcycling is preferred over incineration for sustainable textile waste management.
Post industrial textile (PIT) waste:
Waste that is generated during the manufacturing of textile products and their precursors.

Pre consumer textile export/import:
New textiles and textiles products exported abroad to be further processed into textile products or sold as such (garments...).

Pre-consumer textile (PreCT) waste:
Waste that is generated at the retail stages.

Preparation for reuse:
Checking, cleaning or repairing recovery operations, by which products or components of products that have become waste are prepared so that they can be re-used without any other pre-processing. Precondition for ‘preparing for re-use’ is that the respective item was wasted. Repair or cleaning of items which never became waste are not captured under this treatment category. Preparation for reuse differs from reuse in the intent and not effectiveness of the reuse.

Re-use:
Utilising the textiles in the same or very similar way as they were originally intended.

NB: In Ireland that equals 7% of all discarded textiles (see figure 1)

Textile discard, Clothing discard:
A term generally used in reflection of unwanted textiles discarded from homes, production factories or retailers into charity shops, collection banks and residual bin waste. Textile discard encompasses all types of textile waste, including beddings, carpets and mattresses. Clothing discard tends to refer to soft items of apparel. Statistical reports often separate footwear and accessories into their own category but may be lumped together with textile discard as a whole.

Textile waste:
Any unwanted textiles discarded from homes that can’t be proven to have been Re-used. In the current state of the PCT sector, we can only assume that any discarded textile is waste until proven otherwise.

Recycling:
This term implies that the textiles are being processed to be turned back into itself, in a closed loop meaning for garments that they will be made into new ones (fibre to fibre).

NB: In Ireland that equals 93% of all discarded textiles (see figure 1).
Upcycling:
Taking unwanted textile and adding value to it. This can be through creative streams including reworking, adding components and embellishments, or breaking up the waste into more saleable items. It can also be through functional streams, including adjusting for size or wearability.

Waste3:
Any substance or object which the holder discards or intends or is required to discard.
These activities can be characterised as commercial, charitable and can be carried out by multiple stakeholders. Though these definitions are essential to clarify the framework of PCT sector and who does what, as well as what each can claim and therefore advertise to the public.

Collector/Handler:
A textile collector/handler is an entity that acts as an intermediary between households, commercial establishments, and industrial sectors to collect unwanted textiles. Their primary responsibility is to gather these textiles and subsequently deliver them to another professional or organisation involved in textile processing. Collectors can also perform additional roles, such as sorting and/or exporting.

NB: This requirement ensures that the exporter is actively contributing to sustainable practices and circular economy.

Recycler:
A textile recycler is an entity that specialises in a closed-loop, fibre-to-fibre recycling process. Their primary objective is to transform textile waste into new, high-quality fibres that can be used to produce new textiles. Unlike downcycling or open-loop recycling, which may result in a lower-quality or less valuable end product, textile recyclers focus on maintaining the integrity and quality of the fibres throughout the recycling process.

Exporter:
A textile exporter is an entity that specialises in handling and exporting unwanted textile or textile waste stocks. Their primary activity is to manage these stocks by selling them to overseas markets. However, a textile exporter should not be advertising its activity as Re-use or Recycling unless they can provide evidence that at least 50% of the textile waste they handle is either reused or recycled downstream.
Re-use activities:
Reuse actors in the textile industry are entities that actively engage in the practice of extending the lifespan of textiles utilising them in the same or very similar way as they were originally intended.

(Optional) This may include thrift stores, consignment shops, online marketplaces, clothing rental services, upcycling artisans, and other entities involved in the redistribution or repurposing of pre-owned textiles.

Sorter:
A textile sorter is an entity that collects textiles either directly or from a third party and engages in the process of sorting the products. The sorting is done to prepare the textiles for re-use and/or for upcycling, recycling, or downcycling purposes. The main role of a textile sorter is to categorise and organise the textiles based on their composition, quality, condition, and potential for different sustainable processes, ensuring they are appropriately directed towards re-use or the most suitable form of recycling.
REFERENCES


