



# Redefining used textiles and textile waste

## End-of-waste criteria for reuse and a global EPR scheme | ECOS and EEB joint position

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## Policy recommendations

### End-of-waste criteria

- Set the end-of-waste point after sorting but provide additional safeguards to reflect that exported second-hand clothing generally requires additional processing before it can be sold to a consumer.
- Harmonise sorting guidelines and quality grades per product category for products that are fit for reuse.
- Adopt guidelines and protocols applying a risk-based approach to assist sorters in the task of identifying articles that contain chemicals restricted by REACH or the POP Regulations.
- Allow technical, healthcare, and workwear to fall within the reuse stream after receiving the necessary specific operations or treatments.
- Limit the content of a single bale to only include products that are homogenous in terms of the category of users (men, women, childrenswear), product category, season of use, quality grading based on the harmonised grading system, size, and style.
- Clarify protocols for enforcement and use of end-of-waste criteria.
- Disclose the number of users' complaints for non-compliance with end-of-waste criteria.

### Global EPR scheme

- Cover the costs of compliance with end-of-waste criteria through EPR schemes.
- Ensure an inclusive governance of EPR schemes, to include civil society and all other stakeholders involved in the management of used and waste textiles.
- Develop EPR fee transfer mechanisms between exporting and importing trading partners.
- Support and facilitate inclusive dialogue within receiving countries and between trading partner countries.

### Shipment of used textiles and textile waste

- Explore the potential for HS code evolution to support customs inspections.
- Enforce shipment inspection to prevent the illegal shipment of textile waste wrongly classified as textiles fit for reuse.
- Equate the status of textile waste to that of plastic waste under the Basel Convention.
- Develop reporting mechanisms for unsellable items and digital ordering for exact items.

## EU exports of textile waste and related policies

The global textile sector has been growing at an unprecedented pace in recent decades. In 2022, textiles were on average the fifth-highest source of pressure on the environment and climate from a European consumption perspective.<sup>(1)</sup> The material throughput of the global textile sector has almost doubled since the beginning of the 21st century: from 58 million tonnes of textile fibres produced globally in 2000 to 124 million tonnes in 2023. If business as usual continues, in 2030, global fibre production is expected to grow to 160 million tonnes.<sup>(2)</sup>

The generation of textile waste in Europe has remained stable since 2016 and accounts for around 16 Kg of textile waste per capita, around 6,94 million tonnes in total.<sup>(1)</sup> Coupled with the increase in the volume of synthetic fibres that make up 67% of total fibre production globally,<sup>(2)</sup> the culture of fast fashion has resulted in the emergence of mountains of textile waste. **Europe faces major challenges in managing discarded textiles, including textile waste.** As reuse and recycling capacities in Europe are limited, a large share of textiles collected in the EU is traded and exported to Africa and Asia, and their fate is highly uncertain.<sup>(3)</sup> **The social and environmental costs of the disposal of textile products fall**

**disproportionately on the vulnerable stakeholders** upstream and downstream the value chain and are mostly borne by countries outside of the EU.

Used textiles sold locally in the EU represent only a fraction of all the collected textile waste, with only 0.18 million tonnes reused in the EU out of 2.4 million tonnes which is separately collected.(4) Instead, many discarded textiles are first sorted and then sold to commercial resellers and exported from Europe (alongside unsorted textiles too). **In 2023, 1,4 million tonnes of used textiles were exported**, around 20% of the textile waste generated in the EU. This figure has tripled from the year 2000, reached the current volumes in 2019 and has remained stable since.(1) With the increase in volumes of textiles consumed in the EU, we expect this figure to further rise in the future. It is also important to highlight that the amount of post-consumer textile waste which is collected is expected to rise with the roll out of mandatory separate collection which aims to divert a larger amount of post-consumer textile waste which is generated in the EU (0.9 million tonnes annually) from landfill or incineration. Throughout the past two decades, Africa has been the main receiving continent of used textiles from the EU, with a growing relevance of export to Asia. In 2023, they bought respectively 44,6% and the 43,2% of used textiles exported from the EU.(1)

- According to the EEA, the countries that in 2019 imported the most used textiles from the EU were Pakistan, the UAE, Tunisia, Ukraine, Ghana, Türkiye, Cameroon, Togo and Nigeria.(3)
- UNECE and ECLAC report that, in 2021, the top ten importing countries of used clothing are Pakistan, the EU, the UAE, Malaysia, Kenya, India, Tunisia, DRC, Guatemala and Chile.(5)

Focusing on Africa, several African countries have been debating banning used textile imports as a way to protect and strengthen local textile production. While the import of used textiles creates jobs and the availability of low-cost clothing, they also bring negative social as well as environmental impacts. Nigeria and Zimbabwe have, for instance, banned the import of used clothing as well as South Africa in most cases. However, the effective implementation of these bans has been debated.(6) In 2016, the East African Community (EAC) agreed to ban the import of used clothing by 2019, citing the low prices of such items as an obstacle to the development of the countries in the region.(7) While other countries in the EAC decided not to implement such ban, also under the pressure from the United States, Rwanda banned the import of used clothing in 2018. That same year, the United States suspended Rwanda's right to export clothing duty-free to the United States under the African Growth and Opportunity Act (AGOA).

## **Robust and coherent policies to reshape the textile waste trade**

Much is needed to reshape the textile industry and the global impact of the trade in used textiles and textile waste. These recommendations focus on three key policy instruments:

- End-of-waste criteria for textiles.
- A global or ultimate Extended Producer Responsibility scheme.
- Rules on waste shipment.

In the EU Strategy for Sustainable and Circular Textiles, the European Commission specifically addresses the challenges related to the export of textile waste, supporting a revision of the rules governing the shipment of textile waste, the development of end-of-waste criteria, increased transparency and traceability in global trade of textiles, and fostering dialogue and cooperation with partner countries.

A global shift towards more sustainable production and consumption patterns throughout the global value chain is necessary. The EU has the responsibility to handle the unsustainable volume of discarded textiles, including footwear, without shifting the burden outside the EU. While this position paper does not specifically include recommendations to address overproduction and promote waste prevention,

policies that reduce the overall volumes of textiles and address the fast fashion business model play a crucial role in partly relieving receiving countries of the environmental burdens they face because of European consumption.

### End-of-waste criteria: Paving the way for a circular future

Discarded textiles are classified as waste; end-of-waste criteria establish clear guidelines for when discarded textiles can be considered fit for reuse or when the raw materials obtained after the recycling process is usable. **This incentivises infrastructures for sorting and preparation for reuse as well as innovation in recycling technologies** and creates a market for high-quality recycled fibres. End-of-waste criteria create a pathway for circular economy.

There is an inherent challenge when it comes to setting end-of-waste criteria for textiles, as the criteria cannot determine whether a textile item will be reused in practice or not. It is well documented that large amounts of discarded textile items collected and sorted in the EU, which are considered second-hand goods after sorting (i.e. intended for reuse), are shipped to third countries under CN code HS 6309, which classifies them as 'worn textiles and clothing'. This means they are **no longer classified as waste and can be shipped without the requirements linked to waste shipments**. Nonetheless, these exported items are not always reused and end up as waste in the environment, causing environmental, health, economic, and social impacts.

End-of-waste criteria play an important role in ensuring that used textiles are of high quality and meet other criteria relevant to the clothing habits of importing countries, thus preventing textile waste labelled as "used textiles" from being exported outside of the EU without complying with the requirements linked to waste shipment and potentially ending up as waste in the environment.

#### What is happening now on end-of-waste?

- The **EU is drafting end-of-waste criteria for textiles**, both for (preparation for) reuse, as well as for recycling. The criteria are to be adopted by the end of 2025.
- As part of the One UNEP Textile Initiative, UNEP launched the 'Circularity and Used Textile Trade Project' at the end of 2023, with the objective of producing a global guideline to determine the suitability to trade products as used textiles, and **criteria to differentiate between 'used textiles' and 'textile waste'**. The project will run until 30 September 2025 and it is funded by the European Union. It will focus on four countries: Ghana, Kenya, Pakistan and Tunisia.
- UNECE and UNECLAC published a report with an analysis of the trade in used textiles between Europe and Chile. The report also includes policy recommendations tailored for importing and exporting countries as well as recommendations to the industry.<sup>(5)</sup>

### Global or ultimate EPR: Shared responsibility for a sustainable future

While a global view on end-of-waste criteria contributes to ensuring that textiles intended for the global second-hand market comply with the clothing habits of the receiving country, financing is still needed to **clean up the environmental impacts caused by the exported EU textile waste** and set up the infrastructures in waste-receiving countries to handle the flow of imported used textiles.

EPR holds manufacturers accountable for the entire lifecycle of their products, including their end-of-life management. A global EPR scheme for textiles would create a system where **producers finance collection, sorting, preparation for reuse and recycling infrastructure** in countries importing used textiles and textile waste. As an intermediate solution, PROs of countries in the EU should contribute to financing projects linked to textile end-of-life in importing countries.

End-of-waste criteria for textiles and the EPR schemes, including the eco-modulation of the fees, will have a major impact on the way textile waste is treated in EU Member States, and it is essential to ensure these two policy developments are coherent. In particular, the two policies should be clearly aligned regarding waste status. Furthermore, it will be important to **ensure that the policies are also coherent with the ecodesign requirements** that will be set for textiles within the framework of the new Ecodesign for Sustainable Product Regulation and the eco-modulation of the fees.

### What is happening now on EPR?

- The EU is revising the **Waste Framework Directive**, with a specific focus on textiles and food waste. The European Parliament and Council reached a provisional agreement in February 2025.<sup>1</sup> On textiles, the revision focused mainly on setting specific requirements for Extended Producer Responsibility (EPR) schemes.
- A European Parliament plenary vote will be held in July 2025 to validate the provisional agreement. The revision of the WFD must then be transposed into national law by each Member State within 20 months of entry into force. EPR must be set up 30 months after the entry into force, and countries with existing EPR schemes will need to align with the new provisions set in the revision. By 2027, the Commission will publish an assessment of EPR funding and the possibility of setting textile waste reduction targets for 2029.

### Shipment of textile waste: Basel Convention and the EU Waste Shipment Regulation

The Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal regulates the import and export of waste at the international level. Exporters of textile waste are not required under the Convention to obtain prior informed consent from the importing state. That is foreseen, on the other hand, for other concerning waste streams such as plastic, household, and electronic waste. Moreover, the waste-importing country is not required to demonstrate that it can manage the textile waste in an environmentally sound manner. Textile waste can still be exported freely under the Basel Convention.<sup>2</sup>

In the EU, the shipment of waste is regulated by the **EU Waste Shipment Regulation**, which aims to control the movement of waste across borders, particularly hazardous waste, to protect human health and the environment. The EU Regulation, however, does not differentiate between high-quality, reusable textiles and true waste. This is where end-of-waste criteria come in – by clearly defining reusable textiles, they can complement the EU legislation and promote the responsible export of these textiles to countries where they will be really reused and with adequate recycling infrastructure.

### What is happening now on shipment?

- In May 2024, the new EU Waste Shipment Regulation entered into force. One of the objectives of the revision was to prevent the export of the EU waste challenges to third countries. Generally, the EU bans the export of waste, including textiles, to non-EU countries both for disposal and for recovery. Exceptions may be granted if countries meet specific environmental conditions that are set in the Regulation, such as the ability to treat waste in an environmentally sound manner. In the context of textiles, the Regulation **prevents the shipment of textile waste when there is no guarantee that it will be managed in an environmentally sound manner**. It should prevent the practice of dumping undesired textiles onto other non-EU communities, which can overwhelm local waste management systems and contribute to environmental pollution. The Waste Shipment

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<sup>1</sup> <https://data.consilium.europa.eu/doc/document/ST-7258-2025-INIT/en/pdf>

<sup>2</sup> <https://data.consilium.europa.eu/doc/document/ST-7881-2024-INIT/en/pdf>

Regulation goes a step further than the Basel Convention - textile waste can still be exported freely under the Basel Convention.

- In 2024, France, Sweden, and Denmark proposed applying the approach taken to regulate electronic waste under the Basel Convention to textiles. In practice, this would mean obtaining **prior informed consent for the import and export of textile waste** and banning the export of hazardous textile waste (e.g. stained with chemicals or paint) altogether.<sup>3</sup>

## ECOS and EEB project: Redefining Textile Waste

EU policies on end-of-waste criteria, EPR schemes and waste shipment will have consequences for third countries. Consulting and considering the needs and expertise of the second-hand market's stakeholders of importing countries will be essential for adopting effective end-of-waste criteria. Nonetheless, these stakeholders have been rarely consulted in EU policymaking processes or may not be aware of them. ECOS and EEB aimed at filling this gap by implementing the project: "Redefining Textile Waste". The project aimed at collecting feedback from stakeholders in countries importing used textiles and textile waste on their recommendations on how to make the trade in used textiles more efficient for meeting their needs and of the environment. ECOS consulted stakeholders in Kenya, while EEB focused on Ghana. The information collected was then used to draft policy recommendations included in this report.

## Policy recommendations to reshape the textile trade

### End-of-waste criteria

The newly adopted revision of the Waste Framework Directive sets the rule that collected textiles would be considered waste upon collection, with the exception of products directly handed over to specific operators and professionally deemed as fit for reuse without further operations. The output of sorting and subsequent recovery operations destined for reuse must meet end-of-waste criteria. **End-of-waste is a legal status given to a second-hand article, which is then no longer considered waste and is now considered a secondary product after a sorting process.**

The Joint Research Centre (JRC) of the EU is carrying out a study to develop specific technical proposals for end-of-waste criteria for both the reuse and recycling of textiles, i.e. defining when a used textile article can be considered suitable for reuse, and defining when the raw materials obtained after a textile recycling process are suitable to be considered a secondary raw material.

### Limitations of end-of-waste criteria framework and end-of-waste point

The end-of-waste point is the moment when a waste product complies with end-of-waste criteria for reuse and thus stops being waste and can be considered a second-hand product. However, end-of-waste criteria have a key limitation in their ability to address the oversaturation of secondary markets with low-value second-hand goods. Setting an end-of-waste point cannot guarantee that a textile item will be reused in practice, as this is contextual.

- **Recommendation: Set the end-of-waste point after sorting, but provide additional safeguards to reflect that exported second-hand clothing generally requires additional processing before it can be sold to a consumer**

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<sup>3</sup> <https://data.consilium.europa.eu/doc/document/ST-7881-2024-INIT/en/pdf>

Setting the end-of-waste point after sorting will not tangibly change the situation for countries importing used textiles: large amounts of textiles will continue being assessed as suitable for reuse and exported under HS code 6309. Meeting end-of-waste criteria will not guarantee that second-hand articles will have value for the resale economy in a receiving country. End-of-waste criteria cannot determine whether economic value can be generated from a textile item.

UNEP has [recognised](#)<sup>4</sup> that discarded clothing often ends up in low-income countries, where a lack of waste management infrastructure leads to dumping, burning, and severe environmental and social consequences. It is important to highlight that defining what is waste is intrinsically linked to how retailers are making or losing money, which is directly linked to the susceptibility of second-hand markets in receiving countries to supply chain shocks such as the devastating fire which took place in Kantamanto market in Accra, Ghana on 1 January 2025.

There are merits of **setting the end-of-waste point at retail level** as this would be a more accurate presumption of reuse (when an item is bought by another trader or by a customer through a direct sale). Moving the end-of-waste point to the retail level would also better reflect the fact that while exported clothing generally arrives pre-sorted, items go through a further sorting and selection process many times in a receiving country. However, an end-of-waste point set at the retail stage could result in increased export of unsorted discarded textiles, as all sorting would be effectively deferred to receiving countries.

By setting an end-of-waste point at the point which the textile fraction can be deemed suitable for reuse without any further processing, benefits can be brought about in terms of tightening up sorting processes, bringing more transparency to second-hand clothing value chains, and ensuring that there is at least a minimum legal barrier to the uncontrolled export of second-hand textiles which clearly have no resale value. Nonetheless, due to the limitations highlighted above, additional policy measures and mechanisms will be needed to **tackle the oversupply of textile** products throughout the value chain as the main driver of waste. For example, importing countries should receive funding from the EPR schemes of those countries where the products were first put on the market, as they are the ones that ultimately will have to dispose of the textile waste.

## Quality grades, sorting and chemical guidelines

The percentage of textile waste in bales of used textiles is highly debated between various stakeholders, ranging from 20-50% to almost zero, depending on the interlocutor. At the same time, many stakeholders agree that the quality and durability of clothes are deteriorating and that, in the worst cases, products may be used once or a couple of times before they start presenting major defects, such as tears. Testing the physical durability of textile products would damage them: it would be extremely self-defeating (not to mention unworkable) to test all second-hand products, which are, by nature, unique pieces. The same is true for testing every product for chemicals restricted under REACH or the POP Regulations. It is not feasible to test all the products via analytical methods as it would be too expensive, impractical, and operators might damage the article in doing so. However, we still believe that some safeguards are necessary to ensure that textiles meant to be exported outside the EU fulfil the market expectations of the importing country.

- **Recommendation: Harmonise sorting guidelines and quality grades per product category for products that are fit for reuse**

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<sup>4</sup> UNEP (2025) <https://www.unep.org/news-and-stories/press-release/unsustainable-fashion-and-textiles-focus-international-day-zero>



Articles that are deemed fit for reuse should be categorised based on harmonised quality grades. The EU should elaborate a quality grading system per product category (trousers, shirts, etc.) with different quality levels and minimum requirements for products to be classified within each grade. For example, poor performance under pilling or colour fading may not be seen as major defects that would prevent meeting the end-of-waste criteria, but could be used, among other criteria, to assess under which quality grade the product should fall. The JRC should also produce an exhaustive list of what is to be considered an acceptable minor defect – for instance, mottled appearance and dropped stitches (above a certain threshold for knitted garments) should not be allowed.

Currently, there is no harmonised grading system, and different operators may have different understandings of what a grade A, B, etc. is. On the other hand, by having a harmonised system, operators would have a better understanding of the quality of the used items included in a bale. Otherwise, if the criteria for quality grading keep changing, confusion and uncertainty will increase for operators buying bales, who will benefit from clarity to make informed decisions.

After the preparation for reuse treatment, operators must specify the quality grade of the item, based on the harmonised grading system.

- **Recommendation: The EU should adopt guidelines and protocols applying a risk-based approach to assist sorters in the task of identifying articles that contain chemicals restricted by REACH or the POP Regulations.**
- **Recommendation: Technical, healthcare, and workwear should be able to fall within the reuse stream after receiving the necessary specific operations or treatments.**

Operations include, for example, the debranding of logos for workwear or alternatively, requesting the brand's authorisation to maintain the logo. Technical and healthcare textiles should also undergo a functionality check, in addition to the operations needed for any other textile products.

## **Content and labelling of bales**

- **Recommendation: Limit the content of a single bale to only include products that are homogenous in terms of the category of users (men, women, childrenswear), product category, season of use, quality grading based on the harmonised grading system, size, and style.**

Ideally, only high-quality used textiles that are relevant to the cultural and climatic context of the receiving countries should be imported. Demand characteristics will differ between importing regions. By adopting a set of harmonised quality standards that focuses on reusability and is sensitive to different destination markets, end-of-waste criteria might not be specific enough for each receiving country. The style/colour, the shape/size and the type of clothing are essential factors to determine whether a product will be bought as a second-hand item because body shapes and sizes as well as fashion tastes and climates may differ between geographies.

To address the shortcomings of setting the end-of-waste point after sorting and not at retail level, bales should only include products that are homogenous in terms of the category of users (men, women, childrenswear), product category, season of use, quality grading based on the harmonised grading system, size, and style. They should also be clearly labelled, specifying what they include. It should be mandatory that for each bale the operators provide information on each of the elements above (category of users, product category, season of use, quality grading, size and style). Importers must be able to consciously decide to only purchase second-hand products from specific categories, colours and size etc., knowing that all the products in the bale present the same quality grade. Information on the characteristics of the products in the bale needs to be provided to operators purchasing the bale and aggregated data on the sold bales should be made publicly available.



## Enforcement of end-of-waste criteria

- **Recommendation: Clarify protocols for enforcement and use of end-of-waste criteria**

There remains a lack of clarity on the purpose, status and enforcement of end-of-waste criteria. Given that the end-of-waste criteria are not intended to be sorting protocols (i.e. not a manual of methods for operators for sorters), **it is unclear how these criteria should be used and implemented in practice** and which entities will monitor the application of the end-of-waste status.

- **Recommendation: Disclose the number of users' complaints**

We call for the EU to require producers to **publicly disclose** the aggregated volume and numbers of products for which they have received a complaint from the users (i.e. the operators that buy the second-hand product). This information will be essential to monitor compliance with end-of-waste criteria and to contribute to addressing the risk that bales include textile waste rather than reusable textiles.

## Global EPR schemes

EPR schemes set under the revised Waste Framework Directive and related policies (in particular, Ecodesign) must be set with the aim of reducing production volumes, maximising local reuse, and reducing the amount of low-value used textiles being exported. **EPR fees should cover, among others, the cost linked to the implementation of end-of-waste criteria for reuse.** At the same time, policies must ensure that financial support reaches receiving countries to pay for the unrecognised work being done to manage the EU's textile waste. A way to ensure this financial transfer is to extend the concept of EPR to cover not only the operations happening in the country where it was first placed on the market, but also the operations that take place in other third countries, such as the countries importing second-hand products. **These countries will ultimately have to manage the waste of products that were first placed on the market in the EU.** EPR fees should reflect those costs and PROs should send funds to importing countries to cover those costs. It will be necessary to ensure EPR fees can remain with exported used products even when these are no longer classified as waste because they have met the end-of-waste criteria for reuse.

- **Recommendation: Cover the costs of compliance with end-of-waste criteria through EPR schemes**
- **Recommendation: Ensure an inclusive governance of EPR schemes, to include civil society and all other stakeholders involved in the management of used and waste textiles**

The costs linked to the implementation of end-of-waste criteria, including the implementation of a quality management system, should be paid for by the EPR scheme. **EPR fees should be set to cover all the actual costs incurred** by municipalities, social enterprises, waste operators and operators in third countries. EPR schemes should fully compensate these operators. It is therefore crucial to ensure an inclusive governance of the EPR scheme and regular consultation with civil society, social enterprises and all the other stakeholders that will face costs to manage the textile waste generated from products first placed on the EU market. These stakeholders should be involved in the decision on how the EPR fees are allocated and spent. These decisions should not just be in the hands of Producer Responsibility Organisations (PROs), which are dominated by producers.

- **Recommendation: Develop EPR fee transfer mechanisms between exporting and importing trading partners**

The EU should recognise its role and responsibilities and work with receiving countries to ensure financial resources are available to manage what eventually becomes waste. **EPR schemes should extend cost coverage to support regions heavily impacted by used textile exports from the EU.** The fees could cover the following operations, among others:

- Invest in pollution management and clean up environmental impacts caused by exported EU textile waste.
- Invest in the necessary waste management to handle the flow of imported used textiles. There is a lack of infrastructure, from collection, preparation of reuse, recycling and recovery of waste.
- Invest in safer infrastructure for second-hand markets, to avoid devastating accidents such as the fires in the Kantamanto market on 1 January 2025.
- Provide access to insurance and finance for workers in the second-hand clothing value chain.

To calculate the amount of the financial transfer, the traceability of post-consumer waste should improve, also thanks to the implementation of the Digital Product Passport for apparel. Traceability could contribute to a more precise calculation of the volumes of imported clothes by receiving countries, disaggregated per country where they were first sold. Alternatively, stakeholders in receiving countries suggested using trade flows as a proxy, even if they might be less precise due to used textiles and textile waste passing through many countries before reaching their final destination. For instance, **a fixed fee per container of imported used textiles could be foreseen**. The amount of the fee per volume should be calculated in consultation with civil society and all the relevant stakeholders of the importing country.

- **Recommendation: Support and facilitate inclusive dialogue within receiving countries and between trading partner countries**

Exporting regions such as the EU should consider how they can constructively support and facilitate inclusive dialogue and collaboration among actors in receiving countries. The EU can provide support in terms of Ghana's Roadmap for transitioning to a circular economy, for example. Kenya adopted legislation introducing EPR for various products, including textiles. The EU could support other countries to follow such an example and set up their own EPR schemes. Global EPR financial transfer will be easier to implement if receiving countries already have an EPR scheme in place and established PROs, to calculate the actual costs of all operations linked to the management of textile waste. It is important, though, to ensure that the governance of EPR schemes is truly inclusive, to prevent the exclusion of certain stakeholders (such as waste pickers), corporate capture, and insufficient environmental outcomes.

## Shipments of used textiles and textile waste

In the February 2025 provisional agreement of the revised Waste Framework Directive, the EU specified that all used textiles need to undergo a sorting operation and meet the end-of-waste criteria for reuse before they can be shipped as used textiles under HS code 6309. Unsorted textiles and the ones that do not meet the end-of-waste criteria for reuse are to be treated as waste, **falling under the scope of the Waste Shipment Regulation**. From May 2027, the Regulation prevents the shipment of textile waste when there is no guarantee that it will be managed in an environmentally sound manner. Considering the status of the waste management infrastructure in many countries importing second-hand clothing, it is fair to assume that the latter won't be able to import unsorted used textiles, which will be classified as waste, from the EU.

- **Recommendation: Explore the potential for HS code evolution to support customs inspections**

Currently, used textiles and textile waste are exported using two HS codes: 6309 – worn textiles and clothing; and 6310 – sorted and unsorted used rags and textile scraps. While the EEA applies the rule of thumb of considering textiles under code 6309 as second-hand reusable textiles and under 6310 as waste,<sup>(3)</sup> there is room for improvement. There is no harmonised classification that is currently implemented. HS codes should be more granular to reflect the different pathways for used textiles. Furthermore, the relationship between HS codes and future end-of-waste criteria should be clarified.

- **Recommendation: Enforce shipment inspection to prevent the illegal shipment of textile waste wrongly classified as textiles fit for reuse**

The February 2025 provisional agreement of the revised Waste Framework Directive includes some specific provisions in its Article 22d on **EU Member States inspections of shipment of used textiles**. We call for a swift enforcement of such provisions and to set a minimum number of regular inspections to **prevent the illegal shipment of textile waste wrongly classified as textiles fit for reuse**. Ensuring that shipments of used textiles are accompanied with evidence of payment to registered entities within the destination country will also contribute to increasing the transparency and traceability of used textiles and facilitate the setting up of a global EPR scheme to cover the costs of waste management. No exemptions for donations for victims of natural disasters or for humanitarian aid from the need to provide evidence of a prior sorting operation should be allowed, as this could constitute a loophole for textile waste exports.

- **Recommendation: Equate the status of textile waste to that of plastic waste under the Basel Convention**

According to the February 2025 provisional agreement of the revised Waste Framework Directive, used **textiles need to undergo sorting and meet the end-of-waste criteria for reuse** before they can be shipped as used textiles under HS code 6309. Since the Basel Convention focuses on the import and export of waste, the shipment of sorted textiles that are fit for reuse will not be restricted by it.

At the same time, based on the provisions of the EU Waste Shipment Regulation, the shipment of textile waste will only be allowed if the waste is managed in an environmentally sound manner. Many countries importing second-hand clothing will have to develop waste infrastructure before being able to also import unsorted textile waste. Regardless, the same infrastructures are urgently needed to deal with the volume of waste generated by the import of second-hand clothing. Financial transfers through global EPR should support building these infrastructures.

Among the barriers to scaling up textile recycling, the following can be listed:

- Poor quality of the materials.
- Complexity of the fabrics in terms of composition – sometimes unknown.
- Lack of capital and proper infrastructures.
- Low demand for recycled fibres that are more expensive than virgin materials.

Before importing further textile waste, countries importing second-hand should scale up their waste management and recovery operations, with the support of the Global North through the global EPR scheme. Second-hand clothing will eventually become textile waste and feedstock for recycling operations.

The Basel Convention aims to protect human health and the environment from hazardous waste and to control transboundary movements of waste. In light of the fact that the Basel Convention will not affect the shipment of textiles that are fit for reuse and considering that 67% of global fibres are synthetic,(2) we believe that the status of textile waste should be equated to that of plastic waste under the Basel Convention.

- **Recommendation: Develop reporting mechanisms for unsellable items and digital ordering for exact items**

Transparency and traceability within the textiles value chain must be maximised to increase understanding of material flows to develop a reporting mechanism for traders in receiving countries to report when bales contain items with no resale value. These should be set up through EPR schemes. Digital ordering could be established through feedback loops between sorters in exporting countries and value chain partners in importing countries.

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