

ETSA PROPOSED AMENDMENTS TO WFD REVISION, 17/05/2024

The European Textile Service Association (ETSA) stands as the organization representing the textile services sector, offering essential services such as cleaning and renting reusable textiles, including workwear, personal protective equipment (PPE), medical textiles, linens, and uniforms. **Since 2021, ETSA has served as an Ambassador for the European Commission Climate Pact, exemplifying its commitment to supporting enhanced environmental objectives.**

REVISION OF THE WASTE FRAMEWORK DIRECTIVE

ETSA welcomed the European Commission's proposal for revising the Waste Framework Directive, recognizing the commendable efforts to tackle textile waste. The proposal's inclusion of ETSA's recommendations for a unified Extended Producer Responsibility (EPR) system across the EU is appreciated. Harmonizing EPR regulations would streamline operations, ensuring a level playing field and simplifying compliance for businesses across Member States. Additionally, ETSA emphasizes the importance of eco-design in textile manufacturing, standardized sorting processes, common definitions for textile types, targeted financial incentives for SMEs, and increased research and funding for recycling technologies.

ARTICLE 22a and RECITAL 19

ETSA urges you to address some specific elements in Article 22a and recital 19:

- a clearer definition of relevant PPE (Personal and Protective Equipment)

ETSA acknowledges the unique challenges posed by certain textiles, such as PPE, in the recycling process. While current limitations exist, due to factors like protective coatings and exposure to contaminants, ongoing **research and development efforts hold promise for sustainable alternatives.**

With reference to sorting of textiles, this process is by no means uniform when it relates to post consumers textiles versus technical textiles, and especially with respect to PPE/workwear which have been designed with specific chemicals, such as PFAS for example, and are contaminated or degraded. Mixing these processes could create high risks with substantial negative environmental impacts through increased need for transport, energy for sorting and downcycling. **For this reason, ETSA embrace as many other key textile stakeholders in Brussels, the exclusion of PPE from the revision of the waste framework directive.**

Nevertheless, ETSA also advocates for an effective framework that accommodates PPE recycling requirements **WHEN/ONCE FEASIBLE**, ensuring a cohesive approach across different textile categories- **so that the segment of rental textiles continues to be researched and taken into the equation whilst the legislation progresses.**

As indicated in amendment 53 of the European Parliament legislative resolution of 13 March 2024, MEPs request to the EU Commission to have, by 31 December 2024, laid down further rules on the establishment of extended producer responsibility for PPE could be the occasion to assess the PPE situation and launch a specific impact assessment. Together with specific Horizon partnership funding programme dedicated to this aspect this would help ensuring PPEs being safely recycled and contributing to the circular economy the future.

With this in mind, ETSA reaffirms its commitment to advancing environmentally friendly practices within the European textile industry. Through collaboration with European institutions and stakeholders, ETSA members are at the forefront of innovation, driving initiatives to prolong resource lifespan, minimize waste, and ensure worker safety. ETSA stands ready to continue its vital role in promoting sustainability and facilitating industry-wide transformation.

Article 22a, paragraph 1	
European Commission Proposal	Proposed Amendment
Member States shall ensure that producers have extended producer responsibility for household textile products, articles of apparel, clothing accessories and footwear, apparel and clothing accessories listed in Annex IVc (“textile, textile-related and footwear products”) that they make available on the market for the first time within the territory of a Member State, in accordance with Articles 8 and 8a.	Member States shall ensure that producers have extended producer responsibility for household textile products, articles of apparel, clothing accessories and footwear, apparel and clothing accessories listed in Annex IVc (“textile, textile-related and footwear products”) that they make available on the market for the first time within the territory of a Member State, in accordance with Articles 8 and 8a. This article shall not apply to: - articles of apparel, clothing accessories and footwear identified as personal protective equipment (PPE) intended to protect users against risks as specified in Regulation (EU) 2016/425, - protective textiles used in armed forces or in the maintenance of law and order, - protective textiles designed for exclusive use on seagoing vessels or aircraft,

	- articles of apparel, clothing accessories and footwear identified as medical devices or as an accessory for a medical device in scope of Regulation (EU) 2017/745.
Recital 19	
European Commission Proposal	Proposed Amendment
The household textile and apparel clothing comprise the largest share of Union textile consumption and the biggest contributor to unsustainable patterns of over production and overconsumption. Household textiles and apparel are also the focus of all existing separate collection systems in Member States along with other post-consumer apparel and accessories and footwear that are not primarily composed of textiles. Therefore, the scope of the established extended producer responsibility scheme should cover household textile products and other articles of apparel, clothing accessories and footwear. In order to ensure the legal certainty for the producers on the products subject to the extended producer responsibility, the products in scope should be identified by reference to the Combined Nomenclature codes pursuant to Annex I to Council Regulation (EEC) No 2658/87 ¹² .	The household textile and apparel clothing comprise the largest share of Union textile consumption and the biggest contributor to unsustainable patterns of over production and overconsumption. Household textiles and apparel are also the focus of all existing separate collection systems in Member States along with other post-consumer apparel and accessories and footwear that are not primarily composed of textiles. Therefore, the scope of the established extended producer responsibility scheme should cover household and consumer textile products and other articles of apparel, clothing accessories and footwear. In order to ensure the legal certainty for the producers on the products subject to the extended producer responsibility, the products in scope should be identified by reference to the Combined Nomenclature codes pursuant to Annex I to Council Regulation (EEC) No 2658/87 ¹² . Even if included in the Combined Nomenclature codes of Annex IVc, textile products and other articles of apparel, clothing accessories and footwear covered by the personal protective equipment Regulation (EU) 2016/425, protective textiles used in armed forces or in the maintenance of law and order, protective textiles designed for exclusive use on seagoing vessels or aircraft, and under medical devices or as an accessory for a medical device in scope of Regulation (EU) 2017/745 are not understood to be household or consumer textiles.