



Nature and Extent of Post-Consumer Textiles in Ireland

Stakeholder Views



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Prepared for the Environmental Protection Agency

by

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Overview

Post-consumer textiles are textiles that consumers do not require anymore and have decided to discard such as clothing, footwear, towels, bedlinen, upholstery etc from household, commercial, industrial and public service settings. This study was commissioned by the Environmental Protection Agency to determine the nature and extent of the current consumption of new textiles and generation of post-consumer textiles in Ireland. The findings of this study are presented in the *Study Report of the Nature and Extent of Post-Consumer Textiles* in Ireland. In addition to data gathering, the views of a range of stakeholders, provided in this Ancillary document, were gathered on the improvements needed for the existing collection and management of post-consumer textiles within Ireland. Semi-structured interviews were conducted with relevant stakeholders to the textile industry, both on the consumer side, and on the post-consumer and waste related side. A summary of the improvements for the existing textile systems identified by relevant stakeholders to the Irish textile sector includes:

- Looking at more sustainable products, better models of operation, more use of alternatives like renting and reselling, achieving recycling of mixed textile fibres, etc.
- Capturing more of the textiles currently exported overseas for reuse locally and expanding activity in terms of sorting, reuse, repair, sharing, upcycling, downcycling and recycling.
- Maximising the potential reuse of textiles by improving the collection options available for consumers in terms of where to put used textiles – depending on its quality / condition.
- Looking at introducing more oversight and transparency in operation of textile banks.
- Looking at the effectiveness of different collection methods, including separate kerbside collection of post-consumer textiles.
- Developing closer links between the reuse sector and the retailers and the local authorities in terms of textile collections.
- Ensuring textile retailers have a responsibility for post-consumer textiles.
- Introducing mandatory green public procurement measures for textile goods and services, extending also to second hand textiles.
- Supporting the involvement of social enterprises and businesses to start/expand into the area of sustainable design, repair, vintage, on-line reselling, rental, sorting, recycling, etc.
- Supporting more reuse of textiles by people through different avenues – online, vintage, charity sector, rental.
- Conducting a sustained awareness campaign across the textiles sector regarding the current widespread culture of buying many, cheaper new items which are rapidly discarded.

- Considering fiscal measures and supports such as reducing or removing VAT on second hand goods, on repair, and on upcycling; and introducing tax relief for second hand purchases in charity shops.
- Examining how data may be obtained and improved in terms of post-consumer textile flows.

A detailed compilation of the views of the stakeholders interviewed as part of this study are presented in Appendix 1 and initial recommendations arising from the views shared by the stakeholders are provided in Appendix 2.

Appendix 1 Views of Stakeholders to the Irish Textile Sector

The views of a range of stakeholders in the textile sector in Ireland were captured in a series of semi-structured interviews conducted during summer and autumn 2020 in relation to:

- the existing systems for the collection and management of post-consumer textiles
- what improvements are needed to support separate collection and a circular textile framework.

Interviews were conducted with:

- A luxury retailer's responsible sourcing coordinator
- A clothes designer
- A vintage reseller
- Two online clothes resellers
- A brand planner
- Four major charities: Enable Ireland, Oxfam Ireland, Dublin Simon Community, National Council for the Blind of Ireland Retail (NCBI)
- Office of Government Procurement (OGP)
- Killarney Hotels Sustainability group
- The Southern and Eastern and Midlands Regions waste management offices
- Two local authority Environmental Awareness Officers
- A design consultant & adviser
- Irish Business and Employers Confederation (Ibec)

Though efforts and approaches were made to ensure that a representative range of stakeholders were consulted, given the small scale and short length of the research project there are some information gaps. Approaches were made to some commercial textile recyclers, as well as to clothing retailers in the non-luxury sector which did not result in interviews for these sectors.

Improving separate collection

Consumer information and awareness on separate collection

Across all stakeholders interviewed there is a need for information and awareness raising for consumers on what to do with post-consumer textiles. Consumer information and awareness on separate collection should include:

- Simple, clear, transparent, consistent guidance on what type of textiles should go where (based on type of item, degree of wear, staining, etc.) - outlining what is accepted at charity shops and textile banks.
- Any improvements that the consumer can take to help prior to drop off (being clean is the principal thing).
- Getting the message out to keep all textiles out of the bin, as far as possible. Of course, the bin may be the only option for some textiles, and it is important that keeping textiles out of the bin does not lead to the dumping rubbish on charities.
- Clear instructions for the public around textile donations and what qualifies as reusable quality.
- Transparency to inform consumers who is benefitting from their post-consumer textiles and where they go.

Increasing separate collection activities

The study estimates the domestic waste stream is the single largest source of post-consumer textiles in Ireland. Stakeholders identify a number of improvements to increase separate collection activities:

- Increasing segregation at source through consumer information or behaviour change campaigns.
- Better access to and more drop-off points for textiles – reducing barriers to positive actions.
- Better oversight of textile banks. There is no code of practice for the operation of textile banks.
- Increased transparency over who is benefitting from textile banks.
- Increased take-back by retailers.
- Further links between retailers and charities.
- Increased space for charity shops.
- Examining the potential for separate kerbside collection.
- Exploring the use of community textile banks.

Role of commercial textiles banks for collection

Commercial textile banks are currently the largest source of separately collected textiles in Ireland. Some charities do have their own banks, but most textile banks are commercially owned even though they are usually branded with one charity or another. This is a source of ambiguity for the public. Some charity retailers are not keen to push toward textile banks, while others do see a role for clothing banks as they provide convenience for donators. Textile banks in rural areas can suffer if frequency of

collection is not maintained, as has recently been reported. Illegal dumping around textile banks can be an issue for local authorities.

The role of the charity sector

The charities are viewed as key stakeholders in facilitating textile reuse within Ireland. Various improvements identified include an increase in shop size, ease of access, increasing quality and use of standards. One of the main charities has recently developed order fulfilment centres (OFCs) where shops can order what will sell, i.e. demand-based like commercial retail. The charity is rolling OFCs out across the country.

The role of take-back by the textile retail industry

There are some take back schemes being operated by a few retailers in Ireland, some of which are run in conjunction with a charity:

- TK Maxx (for clothing and home-ware) are linked with Enable Ireland (since 1997);
- Oxfam runs some take back partnerships with commercial retailers;
- Brown Thomas for delivery customers to post donated clothing in the same packaging to SVP;
- H&M have a take-back system in place since 2013.

It is important for the charity sector that increasing commercial take-back does not detract from charity in-store donations. The encouragement of, or indeed mandatory requirement, for take back by retailers is being suggested, either through in-house banks or the industry supporting alternative arrangements. There is the potential for further links directly between the retail and charity sectors. Some charities interviewed felt that this is an opportunity for retailers to show consumers they are taking steps on sustainability.

The role of civic amenity sites for textiles collection

Post-consumer textiles collected via textiles banks at civic amenity sites collection are low relative to other collection methods. However, there is uncertainty in the numbers. One urban local authority is planning on changing from regular textile banks at their main civic amenity sites to an easier access textile handling system.

Other options for textiles collection

Other options suggested for post-consumer textile collections are collection at the kerbside, pick-up collections, and community textile banks for apartment blocks or housing estates. There are existing

other types of collections in operation that could be expanded including collection days and schemes for sports clubs, schools, etc. operated via the commercial textile recyclers.

The waste industry, via their representative organisation, reports that they have little to do with textiles other than that contained within the residual waste stream which is usually only suitable for energy recovery after being through the waste processing system.

Collection oversight and regulation

Local authorities have textile banks in civic amenity sites and some public areas. A small number of local authorities have a contract in place for such banks. However, there is also an array of various textile banks at other public, community and business locations that do not fall under local authority contract/oversight. These usually outnumber the ones under local authority control. Some councils note they occasionally get unauthorised banks appearing which they remove. Since the pandemic, some local authorities report there is no longer an income stream from the textile bank service they provide and have concerns regarding textile banks due to increased usage and poor servicing which has led to illegal dumping. One urban local authority reports problems with on-street textile bank locations due to ongoing issues with illegal dumping and other anti-social behaviour.

In addition to textile banks on public areas and civic amenity sites, commercial textile banks are located on private sites across the country including supermarket car parks, garages, community centres, GAA pitches, etc.

Charities interviewed called for the authorisation or regulation of textile banks. One of the issues raised is the use of charity information displayed on textile banks. This indicates to the public that the charity is the beneficiary when charities receive only a few percent of the overall value of textiles collected through these banks. Currently commercial textile merchants enter into partnerships with charities or not-for-profit organisations. The merchant uses the charity brand prominently on the bank to generate donations. There is no transparency as to who is the major beneficiary of the financial proceeds. The charity can receive a fixed annual payment or a payment per bank. This can be as little as 5-10% of the total sum raised. The perception of the general public is that they are supporting a charity by donating their clothes, in a manner akin to donating a bag of clothing directly in-store at a charity shop, whereas the commercial textile merchants are the major beneficiaries.

Collection of textiles not suitable for reuse

Of particular note in terms of difficulty are bulky textile items like duvets and pillows. There is a need for a solution for such materials.

Improving reuse and the social acceptability of reuse

Consumer information, awareness, and education in relation to reuse – expanding the appeal for second hand textiles

When talking about textile reuse in Ireland, the current main outlet is via the charity shops. However, there are now other options including non-charity vintage shops and online reselling platforms. Textile rental/hire is another potential area to increase reuse. While currently small in terms of quantities, these reuse options have the potential to grow and often encompass demographics that are different to the charity sector.

In addition, the charity sector has expressed a wish to expand their offering and scale and some report a need to continue improvements in the capacity and attractiveness of the charity shop offering. There are still some negative perceptions about charity shops that need changing. Several charities report momentum around sustainability and reuse.

Actions and education, as well as attitude and behaviour change, are needed to increase the public's awareness of textile reuse in terms of sustainability, the potential to keep money in the local community and the opportunity to gain unique pieces.

Role of the younger generation

The online resellers did not see concerns around textile reuse for their younger target markets. The charity sector also reports that younger age groups is a market they are targeting.

Limitations for the second-hand sector

The second-hand sector, be it on-line reselling platforms or a charity chop, are competing against a global multi-billion dollar business. For charity shops, other issues identified include overcoming peoples' perceptions, having an offering that people want in terms of size and convenience, and training of staff to recognise quality.

Using other models for clothing reuse

Other avenues for textile reuse that target different audiences need to be explored including reselling platforms, vintage shops both physical and on-line, textile hire/rental, and swapping.

The role of quality in relation to reuse

Poor quality clothing has an adverse effect on reuse, affecting the quality of goods for resale.

Role of social media, influencers, ambassadors, etc. for the second hand sector

Many stakeholders see social media has a positive role to encourage textile reuse. At the same time social media and influencers are also responsible for increases in consumption.

Fiscal measures and supports

A range of fiscal measures and supports have been suggested by stakeholders interviewed including:

- Reducing or removing VAT on second-hand goods, on repair and on upcycling. Charities do not pay VAT on the sale of donated goods. This is a long-standing position and is approved by the Revenue Commissioners.
- Public funding for education and awareness.
- Provision of supports for resale for small independent retailers.
- Provision of charity warehousing support.
- Measures to encourage social enterprises to emerge.
- Introduction of a personal form of tax relief like gift aid for second hand purchasing.
- Consideration of a national retailer take-back scheme, extended producer responsibility, a deposit return scheme, or carbon pricing. Some advocate for a form of taxation, while others advocate for a living wage for overseas textile workers.
- Consideration of reducing commercial rates for charities and other reuse activities. Charities are levied with full commercial rates in areas where they are deemed to be commercial operators. By contrast, charity shops in Northern Ireland are exempt from commercial rates and in the UK pay approx. 20% of full commercial rates.

Seeding the adoption of circular procurement criteria for textiles in the public and private sector

Public sector

The procurement of textile products and services takes place across a range of different public bodies, not just centrally via the OGP which addresses textile contracts above €400,000 in value. The details of expenditure under individual OGP frameworks is held by the individual contracting authorities and is not available centrally from the OGP.

In terms of textiles, uniforms are currently the main textile element OGP deals with and table 3.1 lists the OGP requests for tenders for uniforms/clothing on behalf of public sector bodies. The OGP also has a framework for Personal Protective Equipment & Workwear, First Aid Supplies and Lifejackets. The overall framework value may amount to some €25,140,000 (excl. VAT) over a 36-month duration.

Some of the items covered by this framework are textile related (e.g. protective footwear, protective coats, etc.) but much of it is also items of materials other than textiles (e.g. helmets, visors, etc.).

There is an OGP framework in development for linen and laundry services. However, currently the purchase of linen and laundry goods continue to be carried out by individual public bodies such as the HSE and the Prison service. There are minor amounts of textiles in a framework for catering equipment such as J-cloths, scrubbers, etc.

The OGP expressed the opinion that at times it is looking for practical on the ground green public procurement (GPP) assistance in terms of procurement of textile products and services, which is something that may be considered in terms of potential future assistance. The OGP has started including some sustainability criteria in its recent textile frameworks, for example packaging must be of recyclable material. In relation to textiles sustainability, these have not been set as mandatory requirements, typically due to a very small set of providers in these specialised markets such as the supply of uniforms or commercial laundry services. Instead suppliers are asked to outline sustainability measures they are implementing such as achieving a longer life for textile goods or reducing the impact of the washing cycle. This is being used to start the process of GPP, however, the onus is on the contracting authorities to make sure that such sustainability elements do happen. Where sustainability elements have been introduced into RFTs by the OGP, the contracting authorities have kept them in place in the final documents.

At present, what happens to textiles at the end of the product life falls to the owner of the contract. The contracting authority could specify as part of the request for tender contract a take-back scheme for the clothing/textiles by the supplier to manage the textiles at the end of life. Since many public bodies will continue to be involved in textile procurement, it is important to ensure measures for textiles developed under GPP are rolled out to all relevant stakeholders. Other significant bodies in terms of textile goods and services procurement would be the HSE and the Prison Service. Aside from smaller RFTs coming from public bodies, there will also be the case of public bodies buying generic uniform styles off the shelf from retailers.

The guidance document *Green Procurement Guidance for the Public Sector*, published by the EPA in 2014 is under revision and due to be published in early 2021. This will include guidance on GPP criteria for Textile Products and Services, based on the 2017 EU GPP Criteria for Textile Products and Services, relevant Irish and EU legislation and procurement practice in the sector.

| Public Sector Body | Description of Goods |
|--|---|
| An Garda Síochána & the Irish Defence Forces | Motorcycle Uniforms |
| Irish Prison Service (IPS) | Towelling Material |
| Irish Prison Service (IPS) | Prisoner Clothing |
| Irish Prison Service (IPS) | Prison Service Operational and Service Dress Uniforms |
| Revenue Commissioners | Customs Services Uniforms |
| National Ambulance Service | Uniform for National Ambulance Service |
| Irish Prison Service (IPS) | Operational and Service Dress Footwear to the Irish Prison Service |
| An Garda Síochána & the Irish Defence Forces | Motor Cycle Clothing and Protective Equipment |
| Irish Coast Guard | Supply of Operational and Service Dress Uniforms and Footwear |
| Irish Defence Forces | Sportswear for the Defence Forces |
| Irish Defence Forces | Service Dress and Operational (SD1) Uniforms and Disruptive Pattern Material (DPM) Uniforms |
| OGP (Department of Public Expenditure and Reform (DPER)) | Supply of Badges, Rank Markings, Epaulettes & Lanyards |
| Irish Defence Forces | Supply of Bespoke Tailored Made to Measure Irish Army Band and Motorcyclist Escort of Honour Uniforms |
| Civil Defence | Supply of Civil Defence Operational Uniforms |
| Áras an Uachtaráin & Houses of the Oireachtas | Áras an Uachtaráin & Houses of the Oireachtas Uniforms |
| An Garda Síochána & Irish Defence Forces | Operational and Service Dress Footwear to An Garda Síochána & Defence Forces |
| DPER | Service Officer Uniforms |
| An Garda Síochána | Operational and Service Dress Uniforms to An Garda Síochána |

Table 3.1 OGP Requests for Tenders for uniforms/clothing on behalf of public sector bodies, Source: OGP

Private sector – a hotelier

The views of a private business stakeholder from the hotel sector is provided. The hotel rents all bedlinen from a supplier laundry company and indicates that most of the local hotels do this. The supplier laundry company provides a range of sheets from 2 star up to 5 star plus. The hotel buys their own towels and spa linen. These are laundered locally and when they are finished they are cut up and used internally for rags. Realistically some of these are ending up in the municipal waste stream. The hotel buys its uniforms and when finished they are donated to the local SVP. The hotel in question has looked at criteria related to sustainability when purchasing new textiles including locally sourced and recycled content and recently found chef uniforms that use recycled PET. The hotelier thought it unlikely that the industry in general considers such sustainability criteria.

Improving repair, care and extending lifetimes of textile products

Some options in this area were suggested including:

- reduction or removal of VAT for repair and upcycling;
- reintroduction of sewing in education;
- continue to promote repair through community initiatives;
- raising awareness for consumers on the environmental effects of textile care like washing;
- increased transparency on care requirements on garment price tags.

Changing mindsets in the longer term – addressing overconsumption

There are examples of initiatives across the country to address consumption, however these responses are taking place against the backdrop of the size and power of the fashion marketing industry. Though the textile and fashion industry has started some sustainability initiatives, the emphasis is still on rapidity and quantity over quality. Future projections indicate further increase in sales and consumption of textiles. There is a general acknowledgement among the stakeholders interviewed that something has to change, and that education and awareness linked to action has a role to play.

Addressing sustainable consumption models and sustainable design

Addressing sustainable consumption models and sustainable design is something that needs to be addressed globally rather than Irish level. There are challenges currently in recycling as blends cannot be recycled. There is a need for more upstream design for durability, for legislative instruments, and for greater responsibility to be put on the producers/brands. There is also a need for more circular economy thinking in education. Market research has shown that customers want sustainable

products. The need to change consumer behaviour from boasting about how cheap clothes are to valuing clothes.

Addressing the social dimension

The need for actions addressing the social aspect of the industry were mentioned.

Scope for increasing post-consumer handling/processing in Ireland, potential markets & employment opportunities for reuse, repair and recycling

Stakeholders interviewed suggest that there is the potential for more of the value of post-consumer textiles to be realised in Ireland than is currently the case, be it via the charity sector, the vintage sector, or the individual via online selling. Combined, such reuse in Ireland accounts for 9,500 tonnes per annum. By comparison, an estimated 35,000 tonnes per annum is exported for reuse. The textile recyclers indicate that about a quarter or so of what they handle is recycled as rags, fibre, etc. It is unclear if these are processed or used in Ireland or exported and corresponds to an estimated 15,000 tonnes per annum. There are some small-scale upcycling projects which are dealing with miniscule volumes when compared to the estimated 65,000 tonnes per annum of textiles in household bins going for disposal/energy recovery. There is ample scope to increase processing and reuse of textiles within Ireland.

Impacts from COVID-19

COVID-19 has had significant impacts on the textile sector in terms of textile consumption and the management of post-consumer materials. In the post-consumer textile markets, fluctuations happen normally. However, 2020 was a year of significant disruption globally where access to markets was cut off for a period of time. During the lifetime of this study, processing of post-consumer textile material recommenced with market activity restarting. While the prices for post-consumer textiles dropped steeply with the advent of the pandemic, there was some initial recovery later in 2020. Some local authorities report a decline in the level of service of textile banks in these recent months, along with an increase in activity, sometimes resulting in illegal dumping.

Appendix 2: Circular Textiles in Ireland

Taking into consideration the views shared by relevant stakeholders to the textile industry interviewed as part of the study, the following initial recommendations were identified;

- A series of initiatives to increase separate collection:
 - Undertake steps for oversight and transparency in textile bank operation.
 - Explore links between the local authorities and the charities for collected textiles.
 - Encourage and facilitate further links between retailers and charities.
 - Explore options for segregation and collection via the household kerbside system and other channels.
- A comprehensive consumer awareness campaign.
- Introduce measures on VAT to make the repair of clothing more affordable and therefore encourage citizens to opt to repair and ultimately invest in quality items that can be repaired.
- Investigate supports for the further development of indigenous sorting, reuse and downcycling industries.
- Examine the potential for a form of gift aid for second hand purchases in charity shops, using proof of purchase to get tax relief on earnings or other benefits.
- Ensure measures developed under GPP are rolled out to the relevant stakeholders in terms of textile actions.
- Examine how data may be obtained and improved in terms of post-consumer textile flows.

A series of initiatives to increase separate collection

The 2020 Waste Action Plan for a Circular Economy includes an action to develop separate collection framework proposals that take account of the potential global impacts of the international trade in post-consumer textiles and in consultation with existing collection operators. The following recommendations are made in relation to increasing separate collection based on the feedback obtained during this project.

Undertake steps for oversight and transparency in textile bank operation

Textile banks are successful in being a convenient option for householders to drop off textiles, and are readily available across the country, some on private sites, others publicly located. Textile banks should continue to play a significant role in textile collection. However, some measures need to be introduced in relation to oversight and transparency in textile bank operation. This could be through a code of practice or similar. The following should be considered:

- Where there is a partnership between a commercial textile recycler and a charity or other beneficiary, at present there is no transparency to the general public as to who is the major beneficiary. It should be required to clearly display on a textile bank how the charity or other partner is benefiting (e.g. “X% of the proceeds of this textile bank go to Y charity/community organisation”). This should be required regardless as to whether a textile bank is on private or public land.
- Provide recourse in the event of an operator going out of business, both for the private site owner or the local authority.
- Provide transparency in relation to reporting on what happens to the donated textiles.

This is likely something that would be developed through a combination of the Department of the Environment Climate & Communication, the charities regulator, the regional waste management offices, and interested local authorities.

It may be worthwhile pooling experience across local authorities in relation to tendering textile bank services, including best practice, model contracts, reporting requirements, information required to be displayed on banks, weight cross-checks, etc. This could start off as a workshop bringing together different experiences across the country. It may also be informative for those local authorities that currently do not operate a textile bank service in public areas or their civic amenity sites. The national review of civic amenity sites may be useful in this regard. The new Regional Public Waste Infrastructure Manager (RPWIM) post that is recommended to be established to oversee the integration of public waste infrastructure could also look at this.

It is noted that the 2020 Waste Action Plan for a Circular Economy includes as an action to review regulation of textile collection banks to ensure compatibility with the SDGs.

Explore links between the local authorities and the charities for collected textiles

In order to improve social impact, increase potential for reuse in Ireland, and for transparency of textile bank donations an exploration should be undertaken between the local authorities and interested charities - are the charities now in a better position to handle some of the local authority

textile collections via the textile banks located in public areas and civic amenity sites? Perhaps they could at least be given the option to process some of this material, or perhaps permission from the local authorities to site some of their collection banks in public areas. There is currently very little of this - all five charities that operate textile banks, do so on private land, mainly supermarket car parks. Based on discussions it is possible that some charities might now be in a position to handle some of what is collected, especially now that many of the local authorities are not getting money for collected textiles. Collections being handled via charities ensure that about half of what is collected is reused in Ireland, with the remainder then still going the route of export plus recycling via the commercial recycling operators.

This could be facilitated by the Department of the Environment, Climate & Communication under the Waste Action Plan for a Circular Economy, possibly initially through the EPA's Local Authority Prevention Network (LAPN).

Encourage and facilitate further links between retailers and charities/social enterprises

Existing successful charity-retailer relationships are ongoing between Enable Ireland and TKMaxx, and between SVP and Brown Thomas. An exploration should be undertaken between charities/social enterprises and the textile retailers - can more partnerships be developed? Can additional retailers be recruited to facilitate in-store take-back and provide collected material to interested charities/social enterprises? Can promotion of any such initiatives be coordinated? Information obtained during the interviews indicated a willingness amongst charities to further explore this.

This could be facilitated by the Department of the Environment, Climate & Communication under the Waste Action Plan for a Circular Economy.

Aside from the textile retailers themselves, is there scope for in-store collections through some of the major national supermarket chains via partnerships with charities/ social enterprises. Some of course already may have commercial textile banks in their car parks, but in-store drop off points, and coordinated promotion using the marketing power of such chains, could allow for better quality donations and facilitate links with local charities/social enterprises.

Explore options for segregation and collection via the household kerbside system and other channels

As it stands, the waste industry has some separate textile collections from the industrial side, but otherwise has little to do with separate collection of textiles. Explorations could be initiated with the waste sector as to whether they are interested in looking at or trialling domestic kerbside collection. Initial conversations as part of the forthcoming Circular Textile project would indicate that some collectors are interested in exploring this. The waste industry may be open to measures that can help

them achieve the recycling targets under the Waste Action Plan for a Circular Economy. There may also be other channels that could be worth exploring in terms of collection.

The 2020 Waste Action Plan for a Circular Economy includes as an action: to ban textiles from the general waste bin, landfill and incineration.

A comprehensive consumer awareness campaign

A concerted and sustained awareness campaign needs to be carried out to educate the public on the best options for ensuring that their textiles remain within our circular economy. This would likely need to occur in stages or addressing different facets and cover: separate collection, reuse, and longer-term sustainability considerations.

It is noted that the 2020 Waste Action Plan for a Circular Economy includes as an action: to support an education and awareness campaign around textiles as a theme of SDG 12 Sustainable Production and Consumption.

In terms of separate collection:

A comprehensive campaign in conjunction with, or following, improvements to collection measures should be carried out. There is a need to develop this in conjunction with the charities, waste sector, and recyclers, setting out a simple, clear, transparent, consistent guide as to what goes where, based on the type of item, covering everything from tights and underwear to rugs and duvets, and depending on the condition of the item in terms of it being reusable, worn, stained or damaged. There should be clear instructions for the public around donations and what qualifies as reusable quality. Any improvements that the consumer can take to help prior to drop off should also be set out - being clean is the principal thing.

Consumers must be made aware that both reusable and non-reusable waste textiles can be accepted. An ongoing JRC project¹ notes differences across EU countries in terms of schemes - some look for both reusable and non-reusable items, others reusable only. It also noted differences in terms of the reusability of different streams: *“A recent detailed survey of the quality of textiles collected in civic amenity centres in Denmark, Norway, Sweden and Germany found that the share of non-reusable textiles delivered varied from just 1.3% to 46%. There was found to be a strong connection between the level and quality of information given to citizens and the quality of the textiles received. When the waste management companies ask for waste, they receive waste. When they ask for reusable textiles, they receive much better qualities”.*

¹ JRC Interim Report, Research into Circular Economy Perspectives in the management of textile products and textile waste in the European Union, October 2020.

There needs to be easy to access information on where exactly reusable textiles can be taken to within a locality. If it is the case that certain items need to go for incineration/heat recovery then it should be clear that that is the case. It is important that keeping textiles out of the bin does not lead to the dumping rubbish on charities.

There is also a need for clarity and agreement in the terms and language used in relation to textiles, e.g. what is meant by 'recycling', 'commercial textile recycler', etc.

There must be transparency as to who benefits from donated textiles as well as where materials go subsequently and, ultimately, what happens to them.

Broader issues:

Any communications campaign should also be used to encourage people to reuse more textiles, through online, rental, vintage, and charity sectors. Aspects like care of textiles, and repair should be covered in such a campaign.

As part of this campaign, an examination could be carried out into clothing/textiles consumption as well as the existing stock of textiles in households. This could be both quantitative and qualitative and might include surveying expenditure/volumes on clothing/textiles as well as usage rates of peoples' stock of clothing. This survey could also look at attitudes around buying, sharing, mending and caring for textiles. More broadly, it could examine what could be done to keep the circularity of textiles flowing, tackling the sort of blockages in the system such as the piles of textiles in wardrobes, warehouses, etc.

In addition, the campaign should address the sustainability and social impacts of the industry and what people can do to help in this respect, including awareness of eco-labels and the significance of this for the environment and human supply chain. Such an approach would provide a holistic insight into the textile industry highlighting the importance of due diligence in purchasing and how to be a proactive consumer.

This broad and comprehensive communication on textiles should be tailored and incorporated into education, both in the primary and secondary syllabus, and also at third level.

It is noted that the 2020 Waste Action Plan for a Circular Economy includes as an action: to promote eco-design for clothing and textiles in collaboration with Irish fashion designers and retailers.

Introduce measures on VAT and commercial rates

As a measure for the implementation of the circular economy, VAT should be eliminated or reduced on repair of goods in general. With regard to textile goods in particular, VAT should be eliminated or reduced in relation to repairs and alterations of textile items like clothing, footwear, and other textile goods. This simple economic measure would encourage more sustainable consumption through avoiding replacements. VAT measures could also possibly be considered in relation to the sale of high-end second hand goods as these compete with new goods.

A consideration of reduced VAT applied to the services of rental of certain textiles (e.g. occasion wear, commercial linen, uniforms, etc.) and possibly to laundering of certain textiles (e.g. bulky household items like duvets, curtains, etc.) could be examined, as these are the models that are being promoted as part of a circular economy.

Reducing commercial rates for charities and others that are carrying out prevention and reuse activities could be looked at.

Investigate supports for the further development of indigenous sorting and downcycling industry

In order to retain more of the valuable textiles within an Irish circular economy we need more indigenous sorting facilities that are linked to the appropriate reuse outlets. A funded exploration of this should be considered, particularly involving the charities, social enterprises and local development schemes such as TUS and RSS. This would examine, what can be done in Ireland in terms of expanded collections, mobile collection, collection at different locations like large workplaces or supermarkets, more developed sorting infrastructure, availability of IT support that could be used (both on the collection side but also for online resales), closer links with training schemes, provision of storage, etc.

This should also explore what might be done in terms of processing textile wastes like duvets, cushions, pillows, etc. Are they, for example, viable for reprocessing in Ireland into floc for use in insulation? If so, how might they be feasibly collected and converted? Markets for such materials would need to be examined, likely overseas, and whether such indigenous processing would still be a net gain for Ireland compared to the current status.

The 2020 Waste Action Plan for a Circular Economy includes as an action to establish a short-term textile industry action group in 2021 that identifies opportunities to:

- Capitalise on the value (jobs, economic and resource value) of textiles present in Ireland, including reuse and preparation for reuse and also recycling; and

- Explore options to improve future circularity in textiles including the potential for introducing Extended Producer Responsibility schemes for textiles.

Examine the potential for gift aid for second hand purchases in charity shops

As a promotional tool for the circular economy, introduce a fiscal incentive to shop in charity shops by using proof of purchase to get tax relief on earnings or other benefits, up to a maximum cap. This would operate similar to Gift Aid (the UK scheme where charities can claim additional monies from the revenue service for financial donations from people who have paid income tax or capital gains tax). The benefit would need to be examined against the likely need for electronic point of sale systems, which few charity shops here currently have.

Consider additional GPP measures on textiles

Recommend taking steps to help incorporate the most significant improvement areas from the 2017 EU GPP criteria for textiles and new 2020 EU GPP guidance for textiles into the main relevant public framework contracts, as they arise for renewal. The programme for government has said that GPP will be mandatory in 36 months. The guidance on GPP is under review and will be published in 2021.

The procurement of textile products and services takes place across a range of different public bodies, not just centrally via the OGP, and this will continue to be the case, as the OGP deals only with textile contracts above €400,000 in value. Thus, there is a need to offer training and such practical guidance for procurement staff across these various bodies.

There is no centralised information on the spend on textiles across all the different bodies, which may be something that could be undertaken.

There may be scope in promulgating the key findings with regard to GPP for textiles to the private sector, for example the hospitality industry.

Examine how data may be obtained and improved in terms of post-consumer textile flows

As it stands post-consumer textile flow data is in places either unavailable or uncertain. Thus, within this report, estimates have been made in certain places. Improving the transparency, accuracy and robustness of these data should be examined in terms of certain streams, particularly textiles collected via textile banks, textiles going overseas for reuse, and textiles sent for material recycling. The ongoing EPA Q2Reuse project may have some recommendations in this regard in due course.

It is noted that the 2020 Waste Action Plan for a Circular Economy includes as an action to support improved data on the nature and extent of the used textile stream.