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Re: DCEE - Draft National Policy Statement and Roadmap on Circular Textiles

Dear Sir/Madam,

The Environmental Protection Agency (EPA) welcomes the opportunity to present views on the draft National Policy Statement and Roadmap on Circular Textiles (hereafter the draft Statement).

The State of the Environment Report (EPA, 2024) calls out the urgent need for systemic change to accelerate the transition to an accessible, fair and affordable circular economy, with our current economic model being damaging, characterised by overconsumption of materials and goods, growing volumes of waste and supply chain emissions, biodiversity loss and water stress. Effective regulation, incentives and enforcement are required to influence businesses and consumers to adopt best practices and normalise the right behaviours in production, supply, purchasing, use and reuse of goods, products and services.

The publication of the draft Statement is welcome given the significant environmental impact of textile production & consumption, and the opportunities for the textile industry as producers to lead the transition to a circular economy.

Through its participation in the National Textiles Advisory Group and in the delivery of the Circular Economy Programme, the EPA's evidence & insights, regulatory, and collaborative activities have already informed the Department in the preparation of the draft Statement.

Regarding the **Vision for Textiles Circularity in Ireland:**

A statement relating to building textile repair skills & educational opportunities would be welcome in the vision, given the importance of building competency and resilience for textile repair skills both within social and commercial repair sectors and the wider population.

Regarding the **Principles underpinning the Policy Framework:**

“Applying the waste hierarchy” is one of the core principles underpinning the policy framework and this is critical. A co-ordinated approach to waste prevention activities is recommended, focussed on behaviour and system change that support consumer and enterprise/industry waste prevention. Setting national targets, delivering national awareness campaigns, providing education & skills training, introducing economic incentives, effective regulation and enforcement can all support and deliver waste prevention. The Circular Economy Act provides for setting targets in the Circular Economy Strategy for the textiles sector; targets to drive waste prevention should be included in the 2nd Circular Economy Strategy.

Supporting the social economy is included as a principle, but it is also recommended to include a principle regarding supporting the commercial enterprise opportunity. There are opportunities to grow and scale circular business models in for example the sharing economy, re-use and repair, manufacturing and retail. The policy framework can support investment, skills training, regulation, green procurement, and economic incentives that promote circular business models through the support of relevant government departments and agencies.

Regarding the **Roadmap Key Strategic Actions:**

- Action 1 (develop a supporting and enabling policy framework) includes developing financial initiatives to promote circular design, tackle fast fashion and overproduction. Incentives which support the use of recycled materials, or make repair accessible (e.g. a national voucher scheme similar to Austria or France) would be welcome.
- In relation to Action 2 (regulatory framework), it is recommended to reference the opportunities of regulation for circularity through end-of-waste and by-products. The EU are developing end-of-waste criteria for textiles and nationally there has been a single-case decision on textiles to date.
- Industry is listed as a supporting organisation for only strategic action 3 (develop an Extended Producer Responsibility Roadmap for textiles). Industry need to lead and support all aspects of the policy framework – from reducing the overproduction of textiles, reducing

the consumption of virgin materials and designing for durability, repairability and recyclability. Given the essential role of industry in the transition to a circular textiles system, it is recommended that industry is included as having specific responsibilities in other strategic actions including Action 9 (awareness and education) and Action 11 (measuring and reporting on progress) and elsewhere as necessary.

- The development of an Extended Producer Responsibility (EPR) Roadmap (Action 3) for textiles will provide an opportunity to incorporate learnings from existing EPR systems and this EPR for textiles will need to place a strong emphasis on waste prevention (including reuse and repair) and acting as a catalyst for system change. A phased implementation plan with clear milestones and regular reviews would ensure the scheme is practical and effective. It will be essential for the Producer Responsibility Organisation, once established, to take a leading role in key strategic actions including supporting investment and development of infrastructure, developing the circular textile ecosystem, bridging the knowledge gap, supporting local reuse, supporting awareness & education campaigns, and measuring and reporting on progress. Producer fees should capture the true costs of collection of used and waste textiles, transportation, sorting, reuse, repair, recycling, other recovery and disposal. It should also fund other activities such as enforcement and national awareness and education activities.
- Action 5 is to support investment in and development of infrastructure across the textile value chain. This action is welcomed, in particular for materials where there is currently no existing solution for collection and management (e.g. duvets and pillows). Possible solutions include funding dedicated collection days at recycling centres for these materials.
- Action 6 is to develop the domestic market for circular textiles products and services. Based on findings from EPA behavioural insights research, persuading positive participation in the circular economy is key. The offering of circular products and services needs to resonate with a larger proportion of the population to encourage and support uptake by the domestic market. The development of the domestic reuse market for textiles in Ireland requires action from all stakeholders across the textile supply chain.
- Action 9 relates to supporting public awareness and education on the importance of circularity in textiles. Influencing and shifting consumers' attitudes and behaviours to reduce consumption, support circular use of textiles and prevent textiles waste requires the implementation of national awareness campaigns, constant presence communications, and educational programmes, informed by behavioural insights.

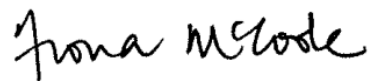
More detailed commentary on the strategic actions is set out in the Appendix.

Strategic Environmental Assessment and Appropriate Assessment

Strategic Environmental Assessment (SEA) evaluates the environmental effects of policies, plans, and programs. It is recommended that the Department clarifies whether the requirements of the SEA Directives have been considered. More details are available [here](#).

The EPA looks forward to continued collaboration with the Department in the development of a circular textiles system in Ireland and is available to discuss any aspect of this submission.

Yours sincerely,



Fiona McCoolle

Senior Manager, Office of Environmental Sustainability

Appendix – Additional Commentary on Key Strategic Actions

Awareness and education:

- A co-ordinated approach in collaboration with stakeholders is needed to implement these awareness initiatives and they need to be informed by behavioural insights research to ensure communication of unified and evidence-based messaging to consumers.
- Circular textile awareness initiatives need to be wide-reaching, targeting ongoing communications to influence consumer behaviours. National awareness campaigns & education programmes, focussing on waste prevention (reduced consumption, reuse, repair) and waste management, should have funding from the EPR scheme for textiles.
- Targeting awareness and education initiatives to younger consumers could have maximum impact to shift current buying and rewear behaviours to more sustainable options. A module promoting the sustainable consumption and rewear of clothes is recommended to be incorporated into the national education curriculum to influence the buying and rewear behaviours of young people at an early life stage.
- The EPA supports evidence-based research to explore mechanisms/interventions to shift consumers' attitudes and behaviours for circular and sustainable textile options. The EPA will continue to facilitate the provision of policy-relevant research and evidence through the EPA Research Programme and to track consumers' behaviours through the Circular Economy Programme's behavioural research programme.
- More research is needed to understand how to change complex consumer attitudes and behaviours towards clothes and develop the domestic reuse market such as normalising buying and selling of second hand clothes. The proposed EPR could include funding for this research.

Supporting reuse and repair:

- There is a need to change the perceptions of consumers to value second hand and repair/repurpose over new and reward their participation through reduced costs and incentives. The offering of circular products and services needs to resonate with a larger proportion of the population to encourage and support uptake by the domestic market.
- Approx 6 per cent of textiles collected are sold for reuse within Ireland. The development

of the domestic reuse market for textiles in Ireland requires action from all stakeholders across the textile supply chain.

- The textile industry and retailers need to take measures to shift their business model of offering consumers products made from virgin materials to offering circular textile products that use recycled textile materials and are designed for durability, repairability and recyclability.
- To facilitate the reuse of secondary textile materials under the proposed EPR scheme retailers should take back a volume of used textile material for reuse which is a representative portion of the textile products they placed on the market.
- The second hand retail sector needs funding support to create inviting second hand retail environments. Strengthening Remark as the national repair/reuse mark would build consumer confidence in pre-used goods and circular services.
- Consumers have low level awareness of second hand retail and repair/repurposes options. The national platform, circular.ie, currently in development, could potentially signpost and promote and direct consumers to second hand retail, renting services, repair providers, and sewing/repurpose training in their locality.
- Optimisation of the condition of reusable materials will reduce textile waste arising. Improved guidance for consumers on where and how to manage used textiles and improved collection, sorting and grading systems are actions that could be taken.
- Improving collection, sorting and grading system needs to include standardisation and compliance with 'professionally sorted' requirements as specified in the revision to Waste Framework Directive to ensure good condition reusable materials, and the creation of strategic of partnerships across the sector is needed to reduce fragmentation of sorting systems.
- In conjunction with developing the domestic market, repair/repurpose skills in the industry need to be developed through accredited training involving State actors such as SOLAS.
- Obtaining insurance is a known barrier to communities developing initiatives that can support circularity for textiles, such as repair cafés. The Rediscovery Centre's research (funded by EPA) on 'Removing Insurance Barriers to Community Repair' has policy recommendations which should be considered when finalising the draft Statement.

Enforcement and reporting:

The current infrastructure is likely inadequate to manage the increased volume of separately collected textiles. There are also issues with illegal dumping as noted in the draft Statement. National and regional infrastructure should be supported and scaled up for circular model including collection, sorting, grading, repair, reuse and recycling. Measures to address these issues should be funded by the proposed EPR scheme and include:

- A step wise development of the necessary infrastructure to support the effective management of increased volumes of separately collected textiles; the development of new markets and outlets for separately collected textiles; and the establishment of stricter enforcement measures and penalties for illegal dumping.
- Accurate data collection and reporting across the textile value chain are crucial for tracking progress and meeting reporting obligations.
- The Central Statistics Office have a role in verifying product/trade data and it is anticipated that the support of the CSO will be needed to measure and report on progress and to expand their metrics to facilitate greater capture of reuse and repair activities in the market. It is therefore recommended that CSO are a supporting organisation for Action 11.
- Textile data will come from multiple sources, e.g. kerbside, bring banks, recycling centres, reuse outlets and textile waste characterisation studies. The development of streamlined reporting processes with provision to support smaller operators to help them meet their obligations as the administrative burden of reporting could be significant. These data can support the methodology and information gathered by the EPA for EU statutory reporting on re-use (quantitative and qualitative).
- The Producer Responsibility Organisation will need to support the collection and reporting of relevant textiles data (placed on the market and waste data) and waste characterisation studies. Data will need to be collected from multiple sources (kerbside, bring banks, recycling centres, reuse outlets) and meet any statutory reporting requirements and/or support reporting on national targets. The data should be provided to the EPA within a timeframe and format to be specified in their authorisation.

ENDS