

Headquarters, PO Box 3000
Johnstown Castle Estate
County Wexford, Ireland
Y35 W821

Ceanncheathrú, Bosca Poist 3000
Eastát Chaisleán Bhaile Sheáin
Contae Loch Garman, Éire
Y35 W821

T: +353 53 9160600
F: +353 53 9160699
E: info@epa.ie
W: www.epa.ie

LoCall: 0818 33 55 99

By email only:

CircularEconomyConsultations@dcee.gov.ie

9 September 2026

EPA Reference: EPAC-1326

Re: EPR Scheme for Textiles Delivery Plan – Draft for Stakeholder Consultation

Dear Sir/Madam,

The Environmental Protection Agency (EPA) welcomes the opportunity to comment on the draft Delivery Plan. Given the importance the revised EU Waste Framework Directive places on adherence to the waste hierarchy and prioritisation of waste prevention, the EPA recommends that the final Delivery Plan states that waste prevention is a core principle in the formation of the Producer Responsibility Organisation (PRO).

The EPA recommends that there is a strong emphasis on the PRO to deliver measures to reduce consumer consumption and the overproduction of textiles, and to increase reuse through support for the development of professional sorting infrastructure, domestic second-hand retail markets, and textile repair services and skills.

The EPA recommends that the final Delivery Plan requires the PRO to ringfence a minimum proportion of annual EPR revenues for waste prevention activities. This proportion should be subject to periodic review and upward adjustment over time.

The EPA recommends that producer fees are set to cover the full costs of measures and activities including collecting, transporting, sorting, reuse, repair, recovery and disposal of used and waste textiles, as well as infrastructure, R&D, enforcement, reporting, compositional surveys and national awareness and education activities.

In developing the scheme, the EPA recommends that the new and ongoing regulatory costs arising within local authorities and the EPA are also considered. The draft Delivery Plan proposes roles for the EPA in assessment, reporting, enforcement and waste compositional surveys. These will require additional and appropriate staff resourcing, ICT systems, data management capabilities and risk-based enforcement arrangements. Requests for the EPA to take on new roles or additional responsibilities should be communicated to the EPA's Office of the Director General in writing, along with information on the proposed staff resources, funding mechanisms and any contingency funding required pending the establishment of the EPR scheme.

The EPA recommends that the Department considers the requirements of the SEA Directive. Appendix 1 provides specific comments relating to the draft Delivery Plan.

The EPA looks forward to continued collaboration including through our participation in the National Textile Advisory Group and the National Circular Economy Communications Group. We are available to discuss any aspect of this submission.

Yours sincerely,



Mary Frances Rochford
Programme Manager
Circular Economy Programme

Appendix 1 – Comments on Sections of the Draft Delivery Plan

Section 5.3 What products are in scope?

While the draft Delivery Plan proposes to focus first on products that fall within scope of the revised Waste Framework Directive, the EPA recommends that the potential to extend the scope of textiles covered under the EPR Scheme is kept under review.

While bulky household textiles (mattresses, carpets, duvets and pillows) will initially be outside scope of the EPR Scheme, the EPA recommends that the State supports initiatives for the collection and management of these wastes, for example through dedicated collection days at recycling centres.

Section 5.4 Forming a Producer Responsibility Organisation

Regarding the PRO governance structure, the EPA supports the option for the establishment of an appropriately constituted advisory committee with representation of sectors across the textiles supply chain.

Regarding PRO application for approval to operate, the EPA recommends that applicants should:

- Demonstrate knowledge of the textiles and post-consumer textiles value chains in Ireland.
- Describe in detail what ‘funding and support’ is envisioned for prevention, repair and reuse activities.
- Propose an approach to the identification of free-riders and to bringing them into compliance.
- Describe how the PRO plans to engage with organisations (including social entities) operating existing separate collection systems.
- Applicants must demonstrate compliance with the priorities of the waste hierarchy (currently this is ‘may’).

Section 5.5 EPR Fees

The EPA recommends that the activities represented in the graphic on page 10 under PRO financial outgoings are covered within the text of this section in the final Delivery Plan.

Section 5.7 Awareness campaigns (producer and consumer)

In relation to awareness campaigns, the EPA recommends that the PRO works co-operatively with the DCEE-chaired Circular Economy Communications Group to align national messaging and campaigns.

The draft Delivery Plan references the PRO providing information ‘via education programmes.’ The EPA recommends that the PRO looks for opportunities to provide relevant information (e.g. on the impacts on textile waste, and opportunities to reduce textile waste) within the national curricula at primary, secondary and tertiary levels.

The EPA recommends that the draft Delivery Plan recognises the role of Repairmystuff.ie as the national online directory for repair organisations. The PRO can play a role in promoting the website as a resource to find a textile repairer, and in providing funding for maintenance of the platform. These activities could support the PRO’s obligations regarding textile waste prevention.

The EPA recommends that the draft Delivery Plan references the policy action in the Whole of Government Strategy 2026-2028 to introduce a pilot Repair Voucher Scheme no later than 2027. Should the pilot (or any future iteration of a voucher repair scheme post-pilot) include vouchers for textiles repair, then the role for the EPR scheme in supporting and funding this policy initiative will need to be considered.

Section 5.10 Targets

The EPA welcomes that targets for textiles waste prevention, collection, reuse and recycling will be formulated following the publication of the DCEE-commissioned study on textile consumption and post-consumption in Q3 2026 and recommends that these targets are included in the PRO's authorisation.

Regarding the EU statutory reporting on reuse under Commission Implementing Decision (EU) 2021/19, there is an annual requirement to report on 'Measures for Reuse'. The EPA recommends that the PRO is required to provide relevant information to the EPA to support this annual qualitative reporting requirement, and to support the EPA's statistics team on quantitative reporting on reuse (every three years) if required.

The draft Delivery Plan includes the target of 4% textiles in household residual and recycling bins by 2031 (as set out in the Circular Economy Strategy 2026 – 2028). This is based on a reference figure of 6%, which is the percentage for total household kerbside waste in 2021, and therefore includes the residual, recycling and organic bin profiles. To note, the EPA will continue to include organic bins in this measurement to ensure comparability with the original figure.

Section 5.12 Enforcement / Compliance

There are potentially significant number of online retailers and distance sellers as well as small producers and micro-enterprises (expected to come into scope from April 2029). Effective enforcement will require appropriate staff resourcing, ICT systems, data management capabilities and risk-based enforcement arrangements.

Section 6 Next Steps

The EPA recommends that in the Final Delivery Plan that there is an additional step for the PRO to outline its plans for adherence to the waste hierarchy.

Appendix 3: Sample PRO Approval Template

The EPA recommends the following points are taken into consideration in relation to the sample PRO approval template:

- **Corporate Governance:** Reference the appropriate representation of sectors from across the textile value chain.
- **Reporting Requirements.** Add requirements regarding data sharing agreements and providing data to support relevant statutory reporting requirements.
- **Target Achievement.** Reference waste reduction and resource use targets (not just waste management targets).
- **Policy Direction.** As currently worded, the emphasis is on waste – this section needs to reflect non-waste textiles which will be managed by the PRO, and circular economy policy directions where relevant.