

ANTICIPATING THE CEA: INDUSTRY CALLS FOR TIMELY GUIDANCE BY THE EUROPEAN COMMISSION ON HARMONISED TEXTILE WASTE MANAGEMENT

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The undersigned organisations, representing the textile ecosystem, have long supported Europe's sustainability ambitions. We continuously advocate for harmonised, impact-driven criteria at EU level in order to avoid market fragmentation, contradictory national measures, and increased compliance costs for companies placing products on the Union market. In particular, an EU-wide, coherent textile waste management system supported by effective Extended Producer Responsibility (EPR) schemes is a cornerstone for achieving the EU's circularity ambitions.

Experience from packaging waste management has shown that a lack of harmonisation and coordination is counterproductive. Multiple EPR reporting obligations across the EU alone can account for full-time employees, who could otherwise be allocated to other activities. For the textile sector, we are already witnessing significant discrepancies among the existing four national EPR systems, which risk fragmenting the EU single market and undermining the objectives of the Waste Framework Directive (WFD).

We therefore urge the European Commission to issue official guidance to Member States, well in advance of the mandatory introduction of Extended Producer Responsibility obligations in 2028, emphasising the need for coordinated implementation of the Waste Framework Directive (Directive (EU) 2025/1982). Member States are developing divergent national requirements, which are likely to result in complex and burdensome reporting obligations and undermine progress towards Europe's circular economy objectives. To ensure coherence, efficiency, and legal certainty, we call upon the European Commission to exercise leadership and coordinate national work on the following points:

- **Scope and definitions:** Products falling within the scope of the EPR system should be aligned with Annex IVc of the WFD prior to its implementation deadline in 2028. For instance, footwear is sometimes included in certain EPR schemes and not in others. Legal certainty would also be strengthened, and the risk of fragmentation reduced, if the Commission recommends that Member States refrain from expanding the list of cost categories listed in Article 22a(8).
- **End-of-waste criteria:** The definition of EU end-of-waste criteria for textiles should be harmonised, so that treated materials can be transported as secondary raw materials, not as waste. This will significantly help create functioning markets and enable textile recycling to become competitive at scale. End-of-waste criteria should be designed to facilitate competitiveness, investments, trade, and the uptake of recycled textiles in new products.
- **EPR governance:** Differences in Member State waste management practices and waste ownership rules are creating significant uncertainty. The operational model must provide full flexibility for Producer Responsibility Organisations (PROs) to ensure efficiency and transparency. This includes clarifying ownership of textile waste

and associated revenues. Producers could share the responsibility for organising the collection, transport, sorting, and treatment of waste, taking on an operational role, rather than a merely financial one, coordinating with local authorities, waste operators, and social economy actors to maximise efficiency and scale.

- **Financing and fees:** The financing of EPR, and the structure of fees should be aligned to push for improved cost-effectiveness. The European Commission should lead the establishment of such structures to reach the objectives established in Article 22c of the WFD. To reduce the risk of double payment of fees and reduce compliance uncertainties, the Commission should clearly guide the Member States in clarifying the principle set out in Recital 32 of the WFD: that the EPR fee should be paid only in the Member State where the product is most likely to become waste.
- **Eco-modulation of fees:** We urge the European Commission to develop as early as possible the Implementing Act on eco-modulation criteria, to discourage Member States from setting divergent national criteria. The harmonised eco-modulation criteria must be aligned with the Ecodesign for Sustainable Products Regulation delegated acts.
- **Compliance procedures:** Registration procedures, data formats, reporting timelines, clear definitions, reimbursement mechanisms, and digital submission processes should be aligned. The European Commission should provide an exhaustive list of documents requested for registration and ad hoc controls by PROs.
- **Data reporting:** Data reporting and technical rules such as weight and conversion rates should be aligned to facilitate compliance and comparability. This includes harmonised reporting templates and processes based on a common core dataset.
- **Coordinated enforcement:** There is currently no effective EU-wide framework to ensure consistent enforcement of Extended Producer Responsibility (EPR) obligations, particularly for cross-border activities. This creates a structural gap between EU-wide commercial operations and nationally based enforcement systems. A level playing field is essential to ensure the effectiveness of EU law. All companies regardless of their size, geographical origin, and business model should contribute fairly to upholding the EU's standards. Additional measures and guidance are needed with regards to preventing free-riding and ensuring effective compliance.

While these principles should be duly reflected in the forthcoming proposal for a Circular Economy Act, expected in Q3 2026, as well as implementing acts and national transposition measures, we call on the European Commission to exercise leadership, reaffirm its commitment to the Single Market Strategy, and ensure the timely issuance of guidance to support consistent implementation.

Signatories:

