

# Policy for sustainable clothing

Policy evaluation in the Sustainable Clothing Futures project



*Bild: Systemdemonstrator för ett hållbart textilsystem, Science Park Borås*

*Hanna Ljungkvist Nordin, Profu  
Birgitta Losman, Science Park Borås*

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## Summary

Recent years have seen a strong focus on sustainability and circularity-oriented policy and legislation in the EU. Many of these policies are directed towards the textile sector. The Sustainable Clothing Futures project set out to evaluate policies related to sustainable clothing value chains and clothing use. This covers policies with the objective to reduce total clothing consumption, increase use rates, reduce primary resource use and minimize climate- and other environmental impacts.

Discussions with stakeholders show that many are positive about the upcoming regulations, such as extended producer responsibility (EPR), eco design requirements and digital product passports. However, some of the legislation comes with a high administrative burden for actors, especially producers. It is problematic that separate collection of textile waste is introduced in the member states just a few years before an EPR is expected to enter into force, since actors are uncertain of their long-term roles and responsibilities.

Overall, more focus on supporting sorting and recycling infrastructure, high quality recycling (such as remake), circular business models and consumer behavior is needed. The project wants to make the following recommendations to policymakers:

- **National targets for collection and management of textile waste** should be decided on national level in Sweden. This can happen already before the mandatory EPR. Without targets the collection systems and the EPR are likely to fail when it comes to impact on climate and environment.
- **Do not focus solely on fiber recycling**, since climate benefits are limited! In a circular system materials are recycled several times. The recommendation is to avoid degeneration of the material in the first "loop".
- **Regulate private import**  
Uncontrolled direct import by consumers from countries outside EU is a growing concern, both in terms of health and safety and for sustainability reasons.
- **Create incentives that push circular consumption behaviors**, such as reduced VAT for second hand and repair. The textile strategy encourages VAT reductions, and it should be extended to more second hand and repair of more products to support circular business models.
- **Create incentives for business-to-business trade of alternative feedstock**. It is important to increase demand for circular and sustainable materials and products business to business, since this drives market volumes.
- **More funding into research and development** of circular textile value chains is needed to develop new business models, recycling technologies, sorting, reuse and remake capacity.

- **Prepare national decisions in cooperation with stakeholders.**  
To overcome the gap between collecting systems managed by the municipalities and the upcoming mandatory EPR, the Swedish government should prepare the national decisions needed to put the EPR on the Swedish market, in close cooperation with the textile and fashion industry.

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## Introduction

In recent years, the EU has launched a wide palette of sustainability related policy and regulation. For textiles, it started with the Textile strategy and has continued to many detailed regulations, from Digital Product Passports to producer responsibility. Policies can be divided into regulatory, economic, information based and behavioral instruments (Steensen & Gwozdz 2019).

The Sustainable Clothing Futures project will map and evaluate policies related to sustainable clothing value chains and clothing use. This covers policies with the objective to reduce total clothing consumption, increase use rates, reduce primary resource use and minimize climate- and other environmental impacts. Originally, the project was also meant to suggest new policy, but this will be limited due to the large number of policies already in the pipeline in EU.

## Aim and goals

The aim of the policy work is to find out which policies that are helpful to assist a more sustainable use of clothing in the future. This also includes pointing out elements of policies that are not helpful and motivating why.

The goal is to make recommendations to policy makers, based on research results from the project.

## Methods

The policy assessment used various methods, such as interviews, survey and literature review, as well as dialogue with the reference group, including a digital workshop.

The work starts by broadly mapping existing and future policies that have potential to improve circularity and sustainability of clothing. The listed policies will then be evaluated using the following criteria (OECD 2009<sup>1</sup>):

- Efficiency (how are economic resources converted to results)
- Effectiveness (to what extent does the policy deliver on its objectives)
- Impact (how widely is the policy adopted and what are total effects)
- Relevance (to clothing sustainability)
- Policy consistency (no contradictions to other policy areas)

The assessment will also evaluate which policies should be prioritized and identify any important policy gaps.

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<sup>1</sup> OECD (2009) Evaluation policy and guidelines for evaluation.  
[job-evaluation-policy-and-guidelines-for-evaluations.pdf \(oecd.org\)](https://www.oecd.org/evaluations/job-evaluation-policy-and-guidelines-for-evaluations.pdf)

## Results

This chapter contains brief descriptions of the different tasks and presents the main results.

### Policy mapping

Since the formulation of the project proposal, there has been a strong development of environmental policy related to textiles, as well as other products, in the EU. Below list and figure illustrates the policies:

- The EU textile strategy
- Producer responsibility
- Separate collection 2025 & EPR
- Digital product passports (DPP)
- Eco design criteria (ESPR)
- Ban destruction of unsold textiles (Part of ESPR framework legislation)
- End-of-waste criteria
- Waste shipment directive

Additional national legislation:

- Reduced/no VAT for second hand
- Reduced VAT on repair and upgrading

### Initiatives from the European Commission 2019-2024

- which are to be implemented in the EU 2025-2030

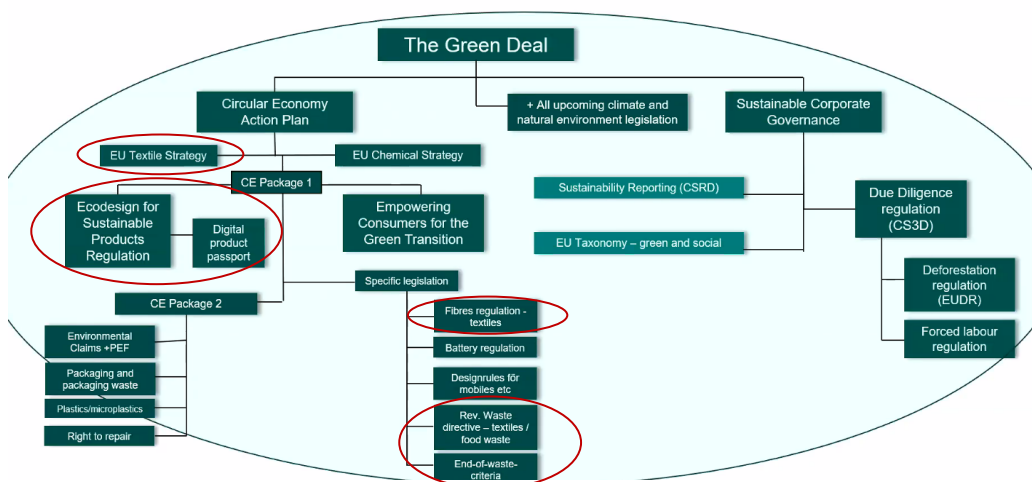


Figure 1: Illustration of the large number of environmental legislations connected to the green deal.  
Source: Svensk Handel

## The EU Textile Strategy

The Textile Strategy was published in March 2022 and is an ambitious document pointing out the direction for a sustainable future textile value chain. It highlights a wide variety of aspects, from design requirements to data sharing and stopping fast fashion. Here is a list of the main content:

- Design requirements for textiles
- Information transparency and Digital Product Passport
- Stop destruction of unsold or returned textiles
- Deal with micro plastic shedding from textiles
- Green claims for truly sustainable textiles
- Extended producer responsibility
- Increased reuse and recycling
- Addressing the challenges from the export of textile waste
- Due diligence for social and environmental fairness
- Ensuring fair competition and compliance in a well-functioning internal market
- Reversing the overproduction and overconsumption of clothing: driving fast fashion out of fashion
- Supporting research, innovation and investments
- Developing the skills needed for the green and digital transition

Since it is not a binding policy, the strategy will not be evaluated in detail. However, we do want to address the lack of policy instruments connected to consumer behavior and circular business models. The importance of boosting social enterprises is highlighted, and the commission promises to develop guidance on promoting circular business models. But it is evident that the strategy also puts responsibility on the companies and the member states to drive development. One example:

*“Member States also have an important role to play. In addition to measures to support the reuse and repair sector, including as part of the social economy, taxation measures, in line with State Aid and WTO rules, can be a particularly useful tool. The Commission encourages Member States to adopt favorable taxation measures for the reuse and repair sector. The Commission will develop guidance on promoting circular business models through investment, funding and other incentives, which will feature the opportunities to create circular value and jobs in the textiles ecosystem.”*

In summary, the Textile Strategy is an important guide to the future policy direction, and clearly signals the importance of transition in the textile industry.

## Interviews

During the first year of the project, stakeholders were interviewed to map their view of the upcoming policies and ask what type of policies are useful and not useful in the textile industry.

Thirteen different stakeholders were interviewed during the timeframe October – December 2022. A semi-structured approach was used, and questions were adjusted to fit each stakeholder.

The interviewed stakeholders were:

- Avfall Sverige (Swedish Waste Management)
- Svensk Handel (Swedish Trade Association)
- Naturvårdsverket (Swedish EPA)
- H&M
- KappAhl
- Outdoor Buddies
- TEKÖ
- Nicole Kösegi (Independent consultant for Boer Group)
- Textile Recycling Association (UK)
- Hot & Cool Institute
- Wargön Innovation
- Sysav
- Södra
- Textile Recycling Association (UK)

#### Analysis of interviews

Overall, there was still a lot of uncertainty among the stakeholders regarding how and when the EPR for textiles was going to be implemented. The need for harmonization was emphasised by many actors, to ensure a level playing field and avoid unnecessary administrative burden.

Almost all actors were positive about the Eco design requirements and thought that it would have an important impact on sustainability. Many actors stressed the need for manual sorting in Sweden or the Nordics, where there is a large gap in capacity today. Financial support to circular business models and regulation of direct import channels were other main issues mentioned by most of the interviewed actors.

### **Policy workshop with stakeholders**

An online workshop with around 20 representatives from value chain actors was held on April 21, 2023, discussing how to implement Producer Responsibility and Digital Product Passports for textiles in the best way. The discussion also touched on Ecodesign criteria and other potentially helpful policy instruments.

Participating organisations were:

- Svensk Handel (Swedish Trade Association)
- KappAhl
- H&M
- Lindex
- Nudie Jeans
- TEKÖ
- Stadsmissionen
- BjörkåFrihet
- Garderobscoachen
- Stena Recycling
- Ragnsells
- Södra
- SVOA
- RISE Research Institutes of Sweden



- Borås incubator

The questions used as basis for discussion are listed below. All questions were not discussed to the same extent, due to time limitations.

1. What target levels do you want in a textile EPR?
  - the same goal in the EU?
  - individual goals per member state?
  - what goals?
2. How can producer responsibility be designed to support circular business models?
3. Other important considerations regarding producer responsibility?
4. What information does/does not need to be included in a product passport?
5. How can product passports enable circular business models?  
Rental, resell & remanufacturing (which information to which actors?)
6. Which aspects are most important to include in ecodesign requirements for clothing?
7. Should reduced VAT be used as a tool to steer towards increased reuse & increased lifespan or not?
8. Do you see a need for government infrastructure investments to make the circular textile system work?

Summary of workshop discussions:

The following points were noted during the discussions.

- Legislation should be as harmonised as possible in the EU, to avoid confusion and high administrative burden.
- There was no consensus regarding what targets should be used in an EPR; some actors wanted both recycling and reuse targets (as in the Netherlands) and others wanted only recycling targets.
- Certain qualities of textile waste should be allowed to be collected separately, for example volumes from laundry businesses that go directly to recycling actors.
- To enable recycling, movement across borders should not be restricted. Many recyclers operate abroad, e.g. in Turkey or Italy.
- Some actors stressed the importance of being able to choose collection system individually.
- All actors agreed that private import needs to be regulated somehow, since it hinders a level playing field on the market.
- A common infrastructure for communication of information to households should be used, to streamline information and avoid different messages and confusion.

- The most important eco-design requirements are life expectancy and other quality parameters.
- Manual pre-sorting is an important enabler for circular business models.
- The role of social enterprises must not be forgotten.
- Actors agreed that VAT should be removed for all types of reuse.

## Survey

The survey “Separate collection of textiles, producer responsibility, product passports and eco design requirements for textiles” was sent to companies within the government assignment Textile and Fashion 2030, coordinated by the University of Borås, in February 2024. It contained around 20 direct questions on legislative issues, as well as many opportunities for reflection and motivation of answers. The survey was sent to just over 200 actors. 41 actors responded, of which 33 companies in textiles and fashion, 4 municipal waste joint stock companies and 4 actors in the non-profit sector. Most of the responding companies were small and medium size companies.

Detailed questions and answers of the survey (in Swedish) are found in Annex 1: Survey results (Swedish). Below, a few highlights of the survey results are presented.

Is it good that municipalities get collection responsibility for textile waste?

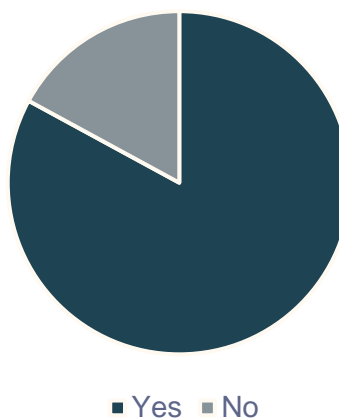


Figure 2: Answers regarding municipal textile waste collection.

Most of the actors believed it was a good thing that municipalities get the collection responsibility in 2025. The motivations pointed to reasons such as the knowledge and infra structure for waste collection that municipalities possess, as well as their close relation to households.

Are you positive about a collaboration between municipal collection and the upcoming EPR?

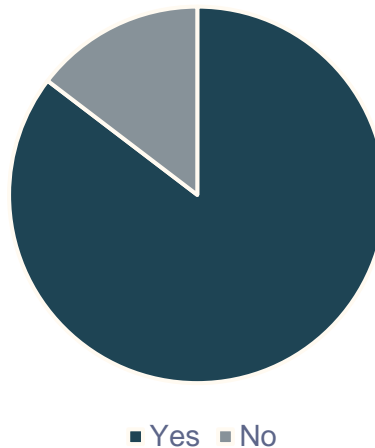


Figure 3: Answers regarding collaboration between municipalities and EPR.

A majority of the respondents also believed that municipalities and an upcoming EPR organization (such as a Producer Responsibility Organisation, PRO) should cooperate. This is not surprising, since in most other EPR:s, municipalities have a strong position in Sweden. As examples, municipalities are responsible to collect packaging from households and organize collection of electric and electronic waste in recycling centers. They are also responsible for providing information to households regarding these EPR schemes (in collaboration with PRO:s).

Is private import of textiles from non-EU countries to the EU market a problem?

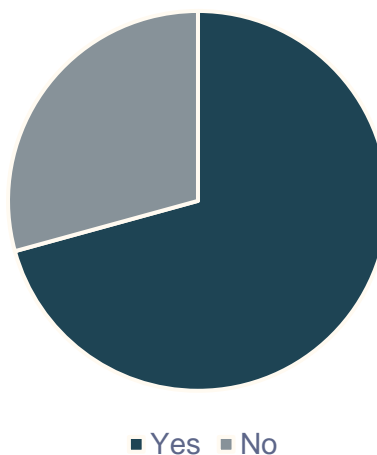


Figure 4: Answers about private import.

In line with results from other parts of the policy work, 41 percent of the respondents believed that private import of textiles to the EU was a problem. Especially low-quality, low-price imports from fast fashion actors were seen as

problematic, since this drives overconsumption and there are doubts if the garments fulfill environmental and social requirements.

Is your company/organisation positive to the introduction of Digital Product Passports?

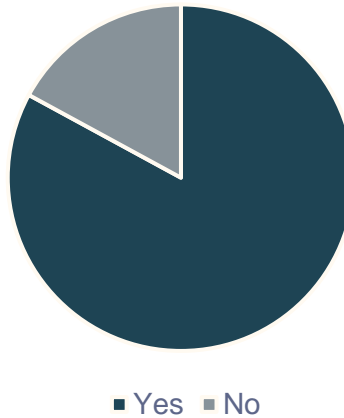


Figure 5: Answers about Digital Product Passports.

83 percent of the respondents were positive about the introduction of Digital Product Passports, emphasizing that increased transparency in the supply chain is an important key to improved sustainability. However, many expressed concerns about the high costs and workload that would follow the implementation, which is especially challenging for smaller companies.

Do you think that consumers will use the information in the product passports?

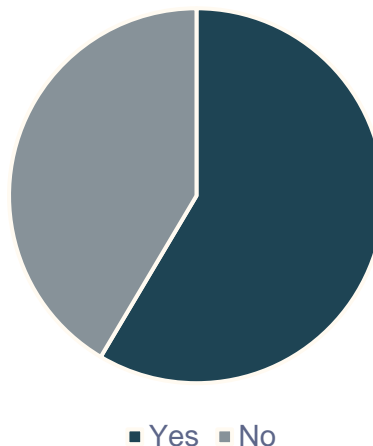
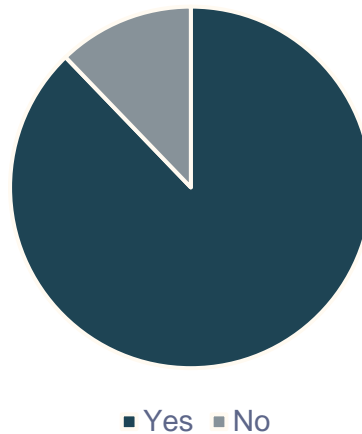


Figure 6: Answers about if consumers will use the DPP information.

There was doubt regarding if consumers will actually use the information in the product passports or not. Many respondents thought that use would be limited to extra interested and environmentally motivated consumers, and that business- to business actors probably would have better use of the DPP:s.

Is your company/organisation positive to the introduction of  
Eco design requirements for textiles?



*Figure 7: Answers about Eco design requirements.*

Most respondents were positive to upcoming Eco design requirements. However, from the free text responses, it was clear that not all had a good understanding of what the requirements would mean in practice. This could be due to the fact that many of the respondents were SME:s, with limited resources to follow up all new requirements.

In summary, the responding companies are positive to cooperate with municipalities when the EPR comes into force. They are concerned about the private import of clothing, which increases unfair competition and undermines a level playing field for EU- and non-EU companies.

It seems to be clear to the companies that the textile industry needs to transform towards more sustainability, since they are positive about the regulations proposed. This is also elaborated in some of the free text comments. However, some of the small- and medium sized companies responding to the survey may have limited resources to follow the development of all new and changing regulations.

## Article

Based on the survey results, the article below was written and published in the Swedish Waste Management paper "Avfall & Miljö" on May 28<sup>th</sup> 2024.<sup>2</sup> The article focused on the textile companies willingness to collaborate with municipalities in the upcoming EPR.



**INSAMLING**

# De vill samarbeta kring textilinsamling

Små och medelstora företag i textilsektorn är positiva till att kommunerna samlar in textilavfall, även när ett producentansvar införs. Det visar en enkät från forskningsprojektet Framtidens hållbara kläder och regeringsuppdraget Textile & Fashion 2030.

**TEXT** BIRGITTA LOSMAN, SCIENCE PARK BORÅS VID HÖGSKOLAN I BORÅS OCH HANNA LJUNGKVIST NORDIN, PROFU

**NYLIGEN UNDERSÖKTE** projektet Framtidens hållbara kläder i samarbete med regeringsuppdraget Textile & Fashion 2030 hur främst små och medelstora företag i textilsektorn ser på kommande lagkrav inom textil.

83 procent av de som besvarade enkäten var positiva till ett kommunalt insamlingsansvar. En ännu större andel, 85 procent, är positiva till samarbete mellan kommuner och producenter kring insamling när producentansvaret så småningom införs. Bland fritextsvaren pekar många på att kommunerna har nära till avfallslämnarna och att det finns en infrastruktur på plats, givet det korta tidsperspektivet till 2025, då textilavfall ska samlas in separat. Vissa ser det kommunala ansvaret som en interimslösning i väntan på producentansvaret, men flera betonar också vikten av att alla parter samverkar för att lösa uppgiften på ett effektivt sätt.

"Det är positivt att se samarbetsviljan bland de svarande eftersom man historiskt haft lite mer låsta positioner", kommenterar Hanna Ljungkvist Nordin och Birgitta Losman som utfört studien. "Man inser att ingen löser denna fråga ensam. Tids- och resursbrist kan också spela in och det är inte säkert att vi fått samma svar om vi frågat större textiltillbolag".

Att textilt material exporteras ut ur EU ser över 70 procent som ett problem, delvis kopplat till svårigheten att spåra materialet när det passerat en större sorteringsanläggning och där blandats med andra flöden. Man är dock medveten om utmaningarna med att avsätta större volymer insamlad textil i Sverige, med bristande efterfrågan på second hand, begränsad återvinningskapacitet, höga hanteringskostnader, kompetensbrist kring återtillverkning och låg betalningsvilja. Lägre moms på kommersiell second hand och ökad medvetenhet hos konsumenterna nämns som potentiella dellösningar, liksom större satsningar på kunskap och kapacitet för att uppgreda eller återvinna materialet.

Slutligen tror de flesta svarande att ett producentansvar dröjer; 64 procent tror att en sådan lagstiftning är implementerad först 2028 eller senare.

**FAKTA**  
Enkäten om separat insamling av textil, producentansvar, produktpass och ekodesignkrav för textil genomfördes i februari 2024 av forskningsprojektet Framtidens hållbara kläder, finansierat av Formas, i samarbete med regeringsuppdraget Textile & Fashion vid Högskolan i Borås. Arbetet med policyåtgärder inom textil genomförs av konsultbolaget Profu och Science Park Borås.

41 skolor svarade, varav 33 skolor inom textil och mode, 4 kommunala utbildningsbolag och 4 skolor inom ideell sektor. Enkäten skickades till drygt 200 skolor.

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Figure 8: The article in Avfall & Miljö nr 3 2024.

<sup>2</sup> [https://ebooks.exakta.se/avfall\\_sverige/2024/2403/28/](https://ebooks.exakta.se/avfall_sverige/2024/2403/28/)

## Policy evaluation

Results from interviews

From the interviews, we have summarized the actor's views on what policies are not useful and what policies have potential to support sustainability. The table below lists the different actor views on policies, as well as short motivations.

*Table 1: Summary of actors opinions on policies, based on interviews.*

Policy	Useful/ not useful	Actors	Motivation
Nation-specific taxes		Retailers, brands	Sweden is too small as a market to change how products are designed. Unfair competition.
Ban on waste export from EU		Recycler	Recyclers often operate outside EU
Eco- modulation of EPR fees		Retailers, brands	No noticeable effect in France. High administrative burden.
Regulation of private import		All actors	Stop unfair competition and low-quality products.
Reduced VAT for reuse & repair		All actors	Incentive-driven policies are more efficient
EPR		All actors	Can create a level playing field and finance investments.
Eco- design requirements		All actors	Good to impact what is put on the market.
Digital Product passports		All actors	Can help sorting and support enforcement.
Regulate free returns & fashion advertising		Independent institute	Need to regulate consumer behavior towards "sufficiency".
Incentives/investment support for circular business models		Most actors	Lots of investments are needed to make these models grow.

When summarising existing and planned EU policies related to textile sustainability, it is obvious that there is a lack of policies and investments supporting sorting and recycling infrastructure, high quality recycling, circular business models and consumer behavior. In the used textile industry, there are increasing concerns about low-quality, low-price fashion from direct import sources such as SHEIN and Temu flooding the market. This is also problematic for the regular brands and retailers, who see the platforms as unfair competition. France has tried to punish fast fashion actors by introducing a law with penalty

charges of up to €10/garment and a ban on fast fashion advertisement.<sup>3</sup> It will be interesting to follow if this has any impact on the clothes put on the market in France.

Based on the interview results and expert assessment by the authors, a qualitative assessment of the different policies was conducted and is summarized in Table 2 below.

Table 2: Overview of policy evaluation

Evaluation criteria / Policy	Efficiency	Effectiveness	Impact	Relevance	Policy consistency
Separate collection 2025					
Producer responsibility (EPR)		<i>Detailed objectives not yet known</i>			
Digital Product Passport					
Ecodesign criteria (ESPR)	?	?			
End- of-Waste criteria					?
Waste shipment legislation					
VAT reductions					

### Motivation of the assessment:

#### Separate collection of textile waste 2025

Only collecting textiles, with no additional funding mechanisms or targets risk to destabilize the markets for used clothing. The sorting, reuse and recycling capacities are already challenging, and collecting low value textiles will not mean

<sup>3</sup> <https://www.aftonbladet.se/nyheter/a/2BRezB/frankrike-kan-bli-forsta-land-att-infora-straffavgifter-for-snabbmode>



that they are taken care of in a circular way. Already by end of 2024, before collection has started, there are signs of market failure with collapsed prices and sorters going into administration.<sup>4</sup> Sorting is an important first step, but without additional measures the risk is that the collected material is incinerated or landfilled, and consumer trust is negatively affected. It is also problematic to build municipal collection infrastructure without knowing if it will be used when the EPR enters into force. A direct implementation of the EPR such as proposed in Sweden in 2020 would have been a better option, reducing uncertainty of roles and responsibilities of stakeholders and giving Sweden advantages in the current work to meet EU regulations.

#### Producer responsibility (EPR)

EPR brings funding into the system, which can support development of much needed sorting and recycling infrastructure. The EPR can also set targets to strive for and put pressure on producers to take responsibility through the entire value chain, even if targets for handling textiles within EPR schemes still are missing in the proposed waste directive. Detailed scope, targets and requirements of the producer responsibility legislation is still being negotiated by end of 2024, which makes detailed evaluation difficult. It is likely that there will be a relatively large scope for member states to design EPR on a national basis.

#### Digital Product Passport

The digital product passport is viewed as a good tool to increase transparency and traceability in the clothing value chain. It can also facilitate better repair and recycling practices once it has been widely adopted. However, the product passports come at a high cost for companies, who need to invest in new systems and introduce new processes for working with suppliers.

#### Ecodesign criteria (ESPR)

This is also one of the regulations with a high level of acceptance among industry actors. Although the detailed criteria for textiles are not yet in place, many see this as a gamechanger in moving the industry away from fast fashion and into more long-lived, high-quality garments and increased use of recycled materials. The costs of implementing criteria are not known, and it is also difficult to evaluate effectiveness until the delegated act with criteria has been developed and published. If the delegated act is clear and not too complicated, the efficiency and effectiveness of the legislation will probably also be green in the evaluation.

#### End-of-Waste criteria

The idea of introducing end-of-waste criteria is to determine when products or materials cease to be waste and become used products or secondary raw materials. This is particularly important for actors dealing with used textiles, reuse and recycling. For textiles, manual sorting is currently needed in order to export used clothes as products rather than as textile waste. This connects to the waste

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<sup>4</sup> [Crisis in Europe's textiles sorting and recycling sector could trigger a domino effect - EuRIC](#)

shipment legislation and aims to prevent the EU from exporting its waste problems to other parts of the world.

#### Waste shipment regulation

Since 2004, waste exports from the EU to non-EU countries have increased by 72 percent. The new EU regulation on waste shipments entered into force on May 20<sup>th</sup> 2024.<sup>5</sup> It sets out stricter rules on the export of waste to non-EU countries. The Regulation will also increase traceability and facilitate the shipments of waste for recycling in the EU and beyond, partly by introducing digital procedures for shipping waste by 2026. One main goal is to fight waste trafficking, which is often linked to organized crime and undermines serious waste management businesses. For textiles, better control of exports could prevent scandals like the ones seen in recent years, where textiles are dumped in African countries with limited capacity for waste management.<sup>6</sup> On the other hand, the impact of increasing the reuse of textile and the aspect of bringing affordable clothes to for example the African markets are arguments from NGOs like Humana Sweden and others. One way forward can be to set standards for responsible export.

#### VAT reductions

To reduce VAT on reuse and repair would incentivize consumers to use their offers more often. In the case of reuse however, it is difficult to assess if the reuse purchase replaces a new purchase or not. If not, it adds extra consumption on top of existing consumption, which is not sustainable.

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<sup>5</sup> [https://environment.ec.europa.eu/news/new-regulation-waste-shipments-enters-force-2024-05-20\\_en](https://environment.ec.europa.eu/news/new-regulation-waste-shipments-enters-force-2024-05-20_en)

<sup>6</sup> <https://www.svt.se/nyheter/utrikes/klader-donerade-till-ghana-branns-och-slangs>

## Recommendations

Policy needs to focus more on supporting sorting and recycling infrastructure, high quality recycling (such as remake), circular business models and consumer behavior. These topics are not adequately addressed in existing policy today. Based on the evaluation of policies and inputs from value chain stakeholders, the project wants to make the following recommendations to policymakers:

- **National targets for managing textile waste** should be decided on national level in Sweden (both collection goals and how to handle the collected material according to the waste hierarchy). This can happen already before the mandatory EPR, so that the stakeholders on the market will be aware of the targets and the Swedish Environmental Protection Agency should have a clear mandate in the supervisory work. The EPR scheme can then be the necessary supporting system to achieve the goals. Without targets the collection systems and the EPR are likely to fail when it comes to impact on climate and environment.
- **Do not focus solely on fiber recycling**, since climate benefits are limited! This was evident in the LCA study of increased fiber-to-fiber recycling conducted in the project.<sup>7</sup> In a circular system materials are recycled several times. The recommendation is to avoid degeneration of the material in the first "loop".
- **Regulate private import**  
Uncontrolled direct import by consumers from countries outside EU is a growing concern, both in terms of health and safety and for sustainability reasons. Most consumers are not aware that they act as importers when buying products from e.g. Temu or SHEIN, and policy makers need to act to reduce the market access for these actors.
- **Create incentives that push circular consumption behaviors**, such as reduced VAT for second hand and repair. This kind of incentives have been introduced in Sweden by previous governments, when VAT for repair of certain products, including textiles, was lowered to 6 percent. In 2023, the government increased the VAT to 12 percent. The textile strategy encourages VAT reductions, and it should be extended to more second hand and repair of more products to support circular business models.
- **Don't forget the incentives for sustainable demand B2B**, closely interlinked with issues of quality, quantity, and price. One important barrier to overcome when leaving the linear system and introducing the circular systems is the lack of demand for sustainable alternatives. This was to mention one example, one of the main barriers when Renewcell was introduced on the market. Thus, incentives to increase demand for circular and sustainable materials and products business to businesses

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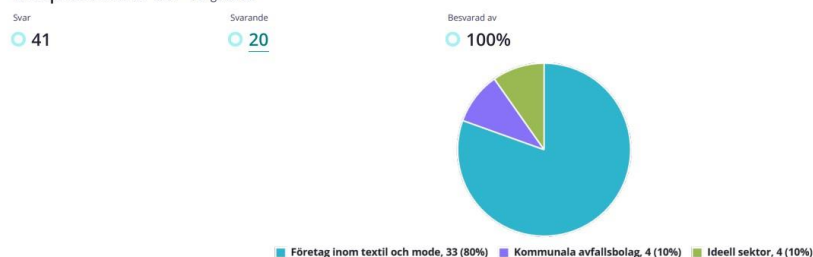
<sup>7</sup> <https://www.diva-portal.org/smash/get/diva2:1815815/FULLTEXT01.pdf>

should be a priority for decision makers.

- **More funding into research and development** of circular textile value chains is needed! Developing new business models, recycling technologies and investing in sorting, reuse and remake capacity is costly. There is a need for more financial support, both for research and implementation of new solutions, to drive sustainable, circular change in the clothing value chain.
- **Prepare national decisions in cooperation with stakeholders.**  
To overcome the gap between collecting systems managed by the municipalities and the upcoming mandatory EPR within the EU, a strong recommendation to the Swedish government is to prepare the national decisions needed to put the EPR on the Swedish market, in close cooperation with the textile and fashion industry. One way forward can be to authorize the Swedish Environmental Protection Agency to update the proposals in SOU 2020:72, to make the proposals from the inquiry compliant with the current EU legislation.

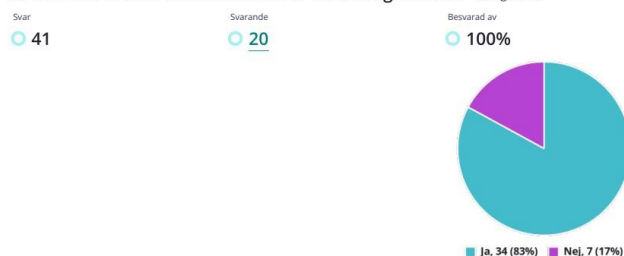
# Annex 1: Survey results (Swedish)

## 1. Representerar du \* Obligatorisk

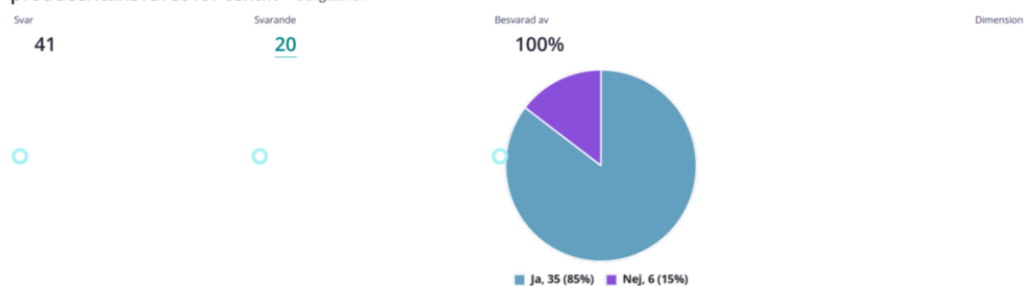


Radioknappar

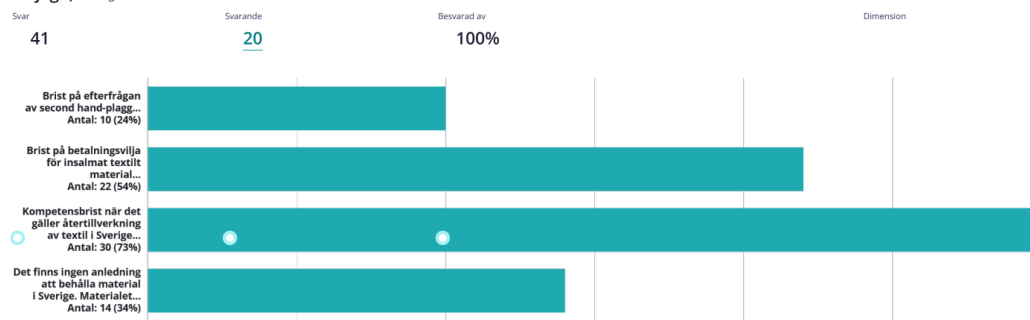
## 2. 1. Är det bra att kommunerna får insamlingsansvar? \* Obligatorisk



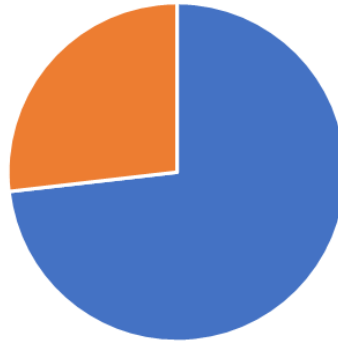
## 4. 2. Ser du positivt på en kommande samverkan mellan det kommunala insamlingsansvaret och det kommande producentansvaret för textil? \* Obligatorisk



## 6. 3. Vad är det största hindret för att få avsättning för insamlat textil material i Sverige enligt din bedömning? (Flera svar möjliga) \* Obligatorisk



Anser du att det är ett problem att textilt material  
exporteras ut ur EU?

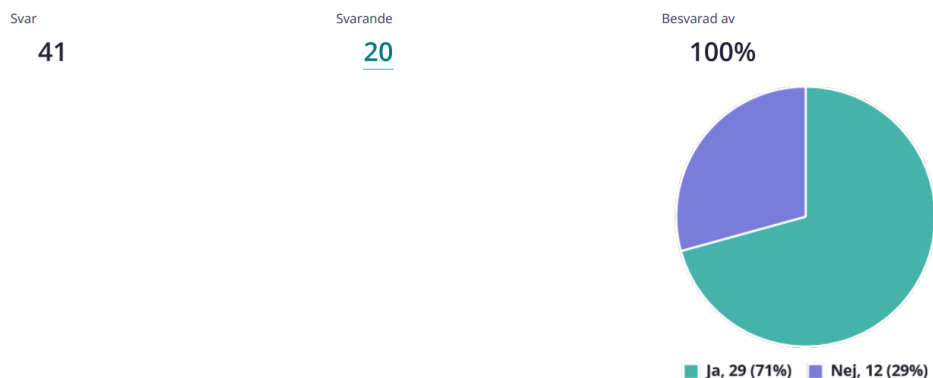


■ Ja (30) ■ Nej (11)

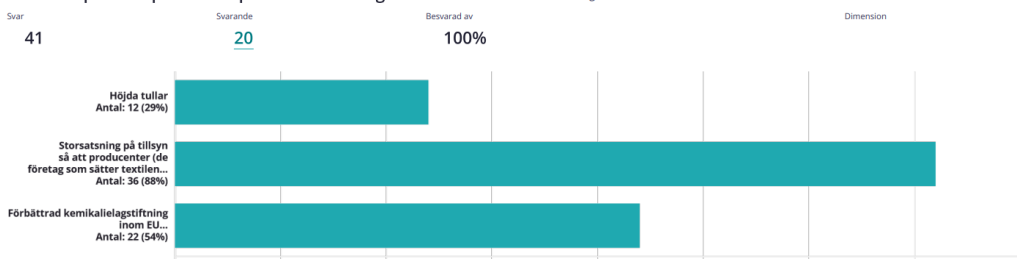
#### Motivering:

- Svårt att ha kontroll på vart det tar vägen
- Det beror på. Att dumpa alldeles för mycket kläder i fattiga länder anser jag är ett problem. Men att återvinna i länderna var materialet kommer ifrån i första hand är ingen problem. Nätt är det bättre att limitera transportsträcka men det är bättre att det återvinns än inte.
- Det leder till nedskräpning och att polyesterplagg eldas upp i högar utomhus.
- Det är alltid svårt att veta vart det tar vägen. Om det inte återbrukas ingen vinning för miljön.
- Dålig uppföljning och spårbarhet.
- Kan definitivt vara ett problem om man inte kan kontrollera VAD som sker med textilierna. Dumpas de i andra världsdelar som second hand plagg kan det slå ut den lokala textiltillverkningen. Dumpas de på sophögar i andra världsdelar kan de bli miljöproblem där.
- Finns inget positiva med att kläderna hamnar i Afrika för att det fattigaste länderna får betalt för att ta emot avfall.
- Som det är nu kan man sälja sitt begagnade material till länder som inte tar hand om avfallet och det hamnar i naturen. Problemet flyttas.
- Vi borde kunna ta hand om textilt material inom EU för att kunna minska jungfrulig fiberproduktion.
- Bevisligen tas det ju inte hand om på ett miljöeffektivt vis

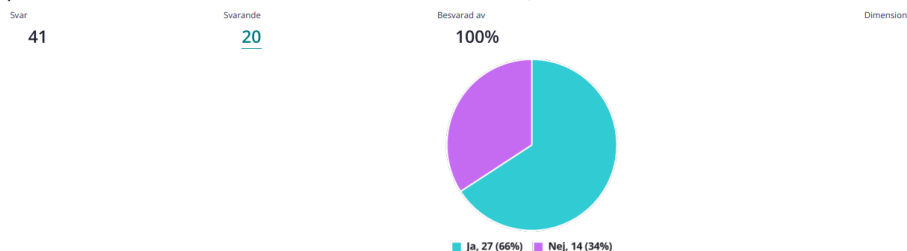
## 10. 5. Är privatimport av textil från icke EU-länder in till EU-marknaden ett problem?



## 12. 6. Om privatimport är ett problem. Vilka åtgärder vill du helst se? \* Obligatorisk



## 14. 7. EU-kommissionen har föreslagit att både kläder och skor ska finnas med i definitionen av textil som kommer omfattas av producentansvar. Är det bra att skor är med i definitionen? \* Obligatorisk



16. 8. Ska EU ha gemensamma mål för återanvändning? \* Obligatorisk

Svar

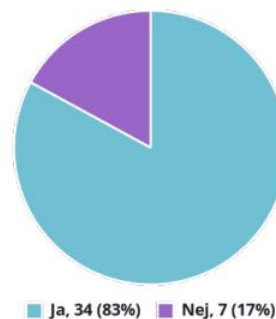
41

Svarande

20

Besvarad av

100%



18. 9. Ska EU har gemensamma mål för materialåtervinning? \* Obligatorisk

Svar

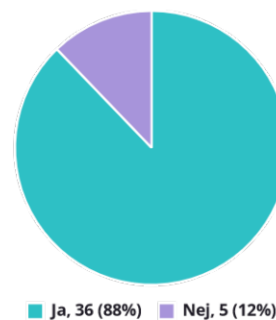
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Svarande

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100%



20. 10. Ska EU ha gemensamma mål för olika typer av materialåtervinning i syfte att uppnå hög miljönytta? \*

Svar

41

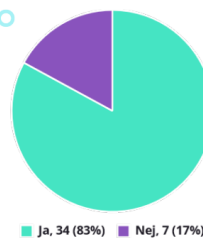
Svarande

20

Besvarad av

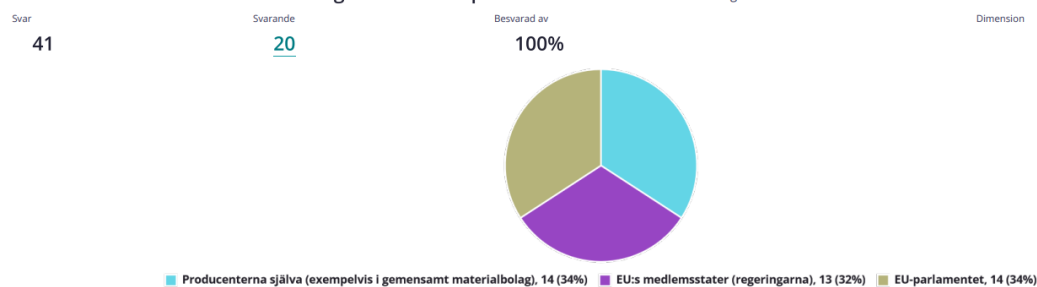
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Dimen

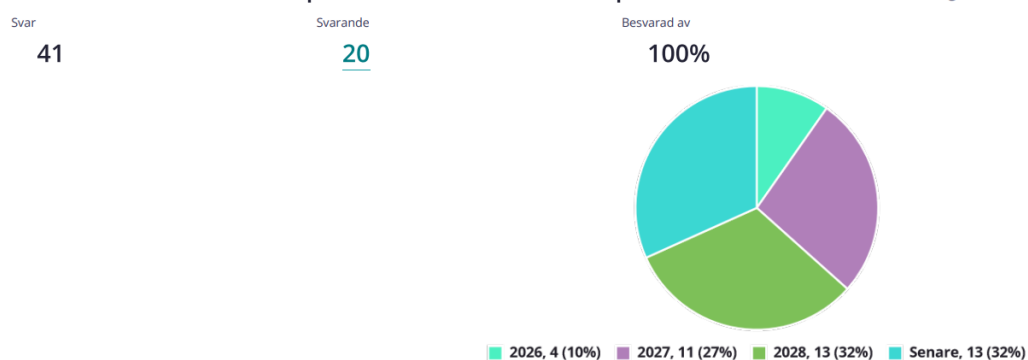




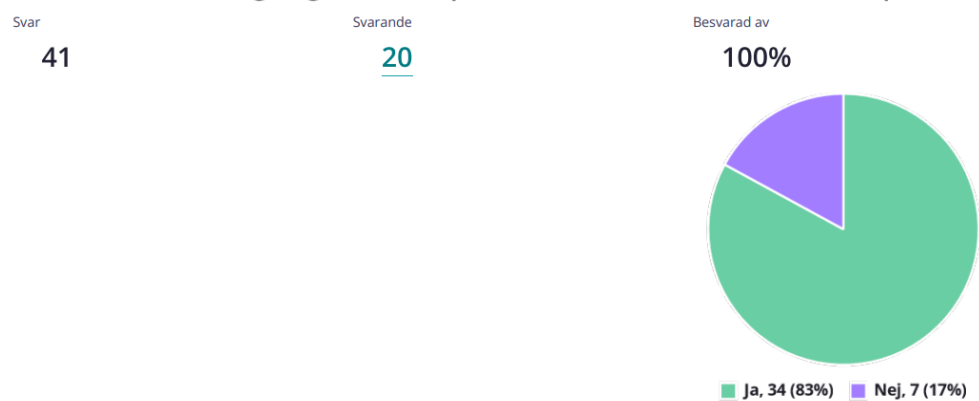
22. 11. Vilka anser ni ska besluta avgiftsnivåerna i producentansvar textil? \* Obligatorisk



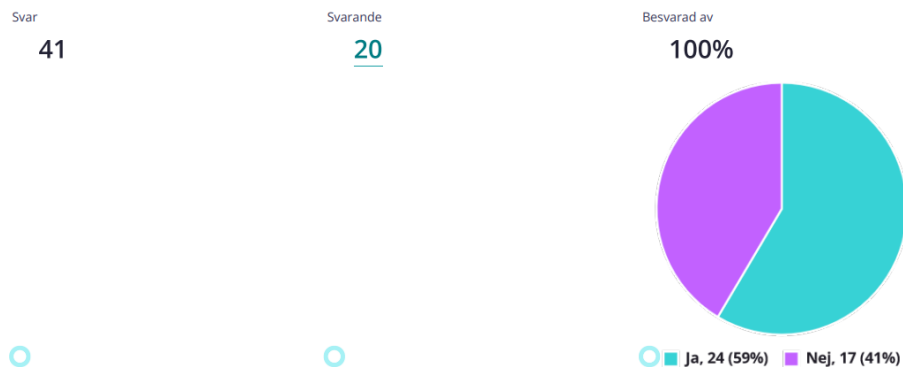
24. 12. När tror du att ett producentansvar är i drift på svenska marknaden? \* Obligatorisk



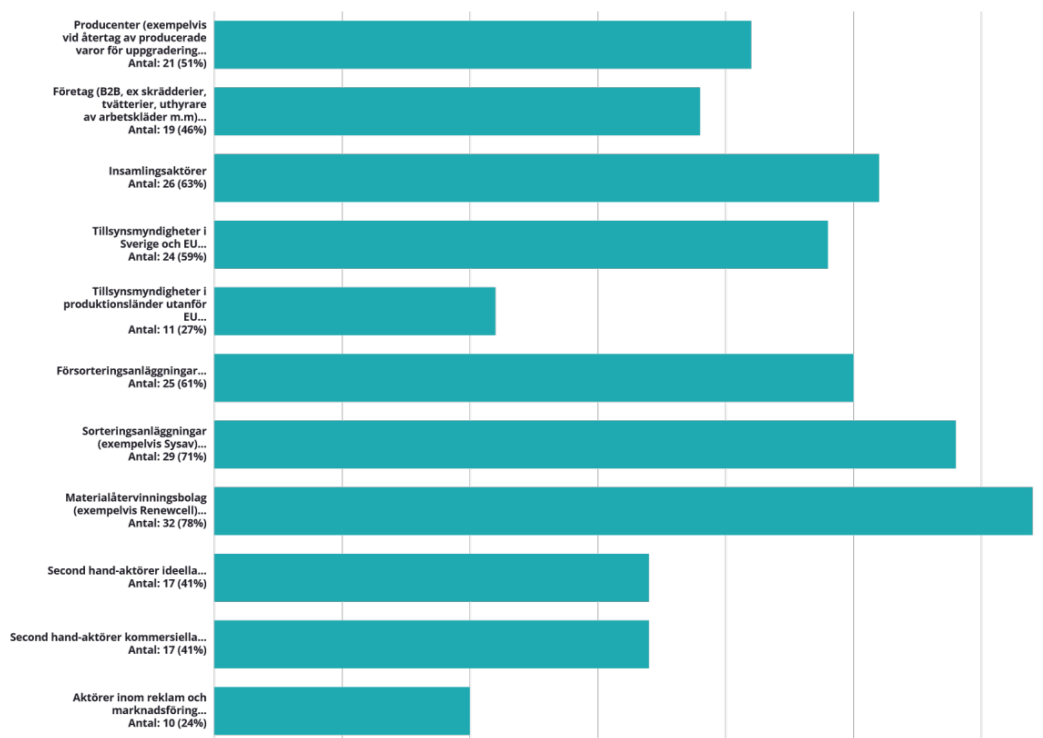
25. 1. Är ditt företag/organisation positivt inställd till införandet av produktpass?



## 27. 2. Tror du att konsumenter kommer att använda information från produktpassen?



## Vilka aktörer kommer ha störst nytta av produktpassen enligt dig? (flera svar möjliga)



32. 4. Är ditt företag väl förberett inför de nya krav som kommer ställas på produktpass?

Svar

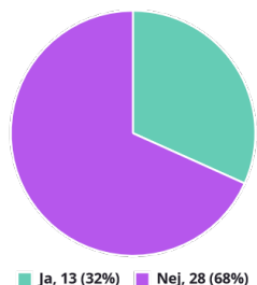
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Svarande

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Besvarad av

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34. 1. Är ditt företag/organisation positivt inställd till införandet av ekodesignkrav?

Svar

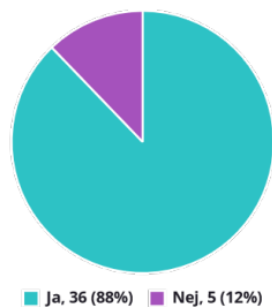
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Svarande

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Besvarad av

100%



36. 2. Har du deltagit i den öppna konsultationen kring ekodesignkrav för textil som JRC leder?

Svar

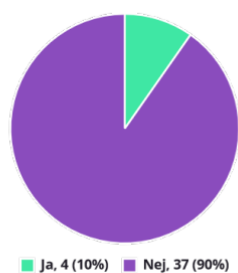
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Svarande

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Besvarad av

100%



Vilka av följande aspekter är mest relevanta att reglera med ekodesignkrav?  
(flera svar möjliga)

