

**MWE Position Paper
Textiles
Commission proposal to amend Directive 2008/98/EC on waste**

Summary of our main points and 33 amendments

1. We welcome the proposal but call for a Textiles and Textile Waste law for the next political cycle
2. Helping implementation to happen: *new Recital, MWE Amendment 1*
3. Measures on Textile Waste Prevention: *new Article, MWE Amendment 3*
4. Timing of mandatory separate collection and EPR not aligned: *MWE Amendments 11, 12*
5. Separate collection and EPR scopes (textiles other than household textiles): *MWE Amendments 4, 5, 24, 25, 26, 32*
6. Unsold textile products: *MWE Amendments 2, 4, 13, 14, 27, 31*
7. Defining the role of local public authorities and social enterprises in EPR: *MWE Amendments 6, 16, 18, 19*
8. Clarifying the role of social enterprises around the waste status: *MWE Amendments 7, 15, 20*
9. EPR cost coverage (communication and textiles in mixed waste also in): *MWE Amendments 8, 9, 10, 21, 30*
10. Principle of Proximity in sorting and reuse: *MWE Amendments 28, 29*
11. PROs reporting obligation (waste collected from social enterprises and auditing): *MWE Amendments 22, 23*
12. Calculation of separate collection rates: *MWE Amendment 17*
13. Eco-modulated fees for Part 2 of Annex IVc: *Additional MWE Amendment 12(i)*

Introduction

Municipal Waste Europe represents European public responsibility for municipal waste management. Our members are municipalities and public waste management companies that play a crucial role in providing this service of general interest and in delivering a circular economy in Europe. We support the waste hierarchy and the exchange of good practices to develop environmentally sound and efficient waste management systems in Europe.

Beginning with the [EU Strategy for Sustainable and Circular Textiles](#), the European institutions and stakeholders have deepened discussions and analysis of the whole value chain of textile products, aiming at finding solutions to the increasing consumption of textiles, related social and pollution problems worldwide and challenges with organising the handling of end-of-life and used textiles. Particularly challenging at the moment, is the handling of textiles collection, reuse and recycling. Member States are obliged to deliver the separate collection of textiles by 1 January 2025 but the rules and Extended Producer Responsibility system governing cost coverage and treatment will not be ready in time.

The estimated gap between the obligation to collect textiles separately and the activation of cost coverage is at best four and a half years. As we write in October 2023, first reading in Parliament is only just beginning and in 2024 there will be at least seven months without decision-making during the electoral period. Following that, the new Parliament and Commission will continue discussions with a possible, optimistic publication of the adopted Directive by the end of 2025.

As a Directive, Member States will have two years to transpose it into their national legislation. The proposal states that Member States must have an EPR system for textiles in place 30 months after adoption of the Directive. Written in this way, EPR for textiles would either have to be in place before transposition or risks Member States interpreting its implementation period as beginning after transposition. Clarity is needed here and the **obligation for EPR to take effect as of the start of separate collection** even if that is retroactive.

Once collected, the textile waste must be sorted to separate reusable items, recyclable textiles and residue. The Directive and Circular Economy aims point to maintaining resources within the EU; therefore, the recyclable textiles would be destined towards facilities in the EU for further sorting into material types, fibre opening (taking the textiles back to the thread) and re-spinning into recovered textiles. This pre-supposes a very high level of investment between today and 1 January 2025, in order that the EU may be ready to receive and process the vast quantities of textile waste that occur in the Union every year, as there is currently huge under capacity.

Today, the value of reusable apparel far outweighs the value of recyclable textiles. Nevertheless, investors are waiting in the wings, ready to invest in sorting and recycling facilities as soon as the legislative basis becomes clear and reliable. The combination of an unclear legal framework with an effective ban on exports of textile waste from the EU that comes with the revision of the Waste Shipments Regulation, together with the exclusion of social enterprises from the waste definition, permitting and recycling requirements (as there is no obligation for them to deliver their unwanted recyclable textiles to the EPR system), **promotes the illegal shipment** of what would continue to be mis-labelled 'second-hand clothing' to non-OECD countries rather than ensuring that these recyclable textiles arrive at recycling facilities for treatment within the EU. This **lack of certainty is a disincentive for investors** as they have no clarity today of whether they would have any textile waste to treat and what quantities they would be planning for.

Given the above and the fact that rules on the collection and treatment of textile waste in the EU together with a system for the coverage of costs by the producer are now urgent as there is just over a year left before the obligation to separately collect, we welcome the Commission proposal to amend the Waste Framework Directive in this regard.

Nevertheless, we see this as a much needed 'quick fix' and only temporary, requiring a complete solution as soon as possible after this adoption.

Textiles and textile waste represent a vast sector with as much or more complexity as packaging and packaging waste, batteries and waste batteries and waste electrical and electronic equipment. As demonstrated by the missing elements in the proposal, which are elaborated below, in our opinion a **full and separate piece of legislation is necessary** to properly address definitions, sorting and recycling requirements, waste and non-waste status, roles and responsibilities of the various actors, status of social enterprises without creating loopholes and more.

The **Textiles and Textile Waste Regulation** should establish the requirements for the entire life cycle of these products and wastes as regards environmental sustainability, including provisions related to labelling, waste prevention, extended producer responsibility, collection, preparation-for-reuse, reuse, end-of-waste and recycling of textile waste as well as incentives for innovation and investments in necessary infrastructure and incentives related to green public procurement. Taking account of the Ecodesign Regulation, product-related considerations can either be copied or referred to directly into this Regulation on Textiles and Textile Waste, including the ban on the destruction of unsold goods as proposed by Parliament and Council which requires that this Regulation addresses not only municipal waste but also **commercial and industrial waste**. Although we are still waiting for final adoption, it is clear that the EU Parliament and Council agree on a ban on the destruction of unsold textiles and footwear. Likewise, the treatment of **historical textile waste** is omitted without clarity of what this means in practice. In order for separate collection and treatment of textile waste to work, the legislation must make it absolutely clear that as of the date of separate collection, the costs incurred for collection, transport and treatment are covered. Taking the WEEE Directive as a precedent, historical waste must be brought within the responsibility of the producers and their PROs from the outset of separate collection.

In short, we find this proposal does not adequately cover the requirements for creating a textile waste reuse and recycling sector which will be capable of treating all of the textile waste that arises every year in the EU, especially given the fact that there is currently no capacity for the treatment, recovery and disposal of textile waste.

Clear role of Municipalities and Social Enterprises

We acknowledge and support the key role of the social economy in existing collection schemes for textile products. Social enterprises contribute to the creation of quality jobs and social inclusion. Furthermore, they provide environmental benefits derived from their role in enabling preparation for reuse and repair of textile products. In many cases, across the EU, municipalities and social enterprises work hand-in-hand and have already established long-term agreements together and a strong collaboration. MWE would like to continue supporting this long-standing cooperation but the lack of clarity in the proposal will negatively impact the traceability of collected textiles, will encourage illegal shipments of textile waste under the title of 'used textiles' and cause misrepresentation in the calculation of collection rates if not addressed.

As with all other municipal waste streams, as given in the Waste Framework Directive, municipalities hold the obligation to ensure the collection of municipal waste as per the enacted legislation and as a part of delivering this Service of General Interest. In practice, this can be carried out by the municipality itself, outsourced or organised in coordination with other actors.

In countries such as The Netherlands, Germany or Italy, municipalities can choose to carry out the collection of textile waste themselves or together with other municipalities or can select a private collector to collect textiles on the instruction of the municipality. Across the EU, municipalities have established a harmonious system of cooperation with social enterprises, enabling them to place containers on the streets for the collection of textile waste from citizens and sort what they collect for reuse. However, in the Commission proposal, the non-waste status given to social enterprises, under Art. 22c paragraph 11 which comes with the absence of any permit obligation, make it challenging to reconcile social enterprises' role with this new and wider responsibility to organise the collection of all municipal textile waste. It is most important that the role of social enterprises and their cooperation with municipalities is preserved, so as to enable their continued work and their role in preparation-for-reuse and reuse of textile waste. This should apply:

1. Without creating unequal treatment between supply chain operators within the EPR system,
2. Without being to the detriment of the clear identification of roles, tasks and responsibilities of the other actors involved in the supply chain
3. By avoiding loopholes and illegal 'used textile' shipments

In this context we would also recommend adding a **definition of 'social enterprise'** in the WFD to ensure harmonised implementation across the EU.

Please find our proposed amendments to rectify these legal ambiguities, below.

MWE Amendment 1
Helping implementation to happen

Commission proposal	MWE amendment
	<p>NEW - WFD Recital</p> <p><i>Implementation of the requirements, systems, targets and further obligations set out in this Directive is an integral part of Member States' ability to achieve a circular economy, for the creation of new jobs and for their increased economic strength and stability.</i></p> <p><i>Implementation of the separate collection at source of all recyclable waste fractions mentioned in this Directive, accompanied by continuous communication to all parties, is an integral part of delivering economic strength, stability and a circular economy.</i></p> <p><i>Separately collected waste fractions must be measured and their treatment capacity planned for. Clean quantities of each waste type for preparation for reuse and recycling must be delivered into the relevant sorting and treatment technologies ensuring sufficient planned capacities to ensure correct treatment of the waste fractions with the avoidance of loss of resources and avoidance of landfilling.</i></p>

Justification:

The greatest need for change in the remainder of the Waste Framework Directive is to ensure implementation. In this light both encouragement, funding and obligations must be clear and available.

Encouragement can come from non-economic incentives given to citizens, commerce and industry to sort their waste at source; in the case of textiles this can include encouragement to sort reusable textiles and deliver them directly to re-sale outlets or deliver them to preparation-for-reuse operators when direct reuse is not possible; communication campaigns are a good method for encouragement. Funding is available for all sustainable investments from all EU grants and loans whether public or private or mixed as specified in the delegated act on environmental criteria of the Sustainable Investment Regulation (Taxonomy) as published on 27 June 2023 ([Document C\(2023\)3851](#)). This includes the Structural and Cohesion Funds, Horizon Europe, InvestEU, EIB and others.

MWE Amendment 2

Definition of 'Unsold textile product'

Commission proposal	MWE Amendment
	<p>Article 1(2) new definition 4h <i>'unsold textile product' means any textile products listed in Annex IVc, fit for consumption or sale that have not been sold including surplus, excessive inventory, overstock and deadstock, including those products returned by a consumer in view of their right of withdrawal in accordance with Article 9 of Directive (EU) 2011/83/EU;</i></p>

Justification:

In accordance with the ban on the destruction of unsold textile products under the Ecodesign of Sustainable Products Regulation, we consider it to be of paramount importance to include a definition of 'unsold textile products' in Article 3 of the WFD so that these items will be covered by the relevant Articles referring to EPR and PROs. Unsold textile products, if not correctly handled, may cause negative environmental impacts in the EU and beyond, therefore they should not be omitted from extended producer responsibility. In order to add certainty to what we refer with 'unsold textile product' in our amendment 4, we propose the definition introduced by the EU Parliament in the Commission proposal for an Ecodesign Regulation for Sustainable Products.

MWE Amendment 3

Provisions on textile waste prevention

Commission proposal	MWE amendment
	<p>New Article 22a (i) Title <i>'Textile waste prevention'</i></p> <p>1. Member States shall take prevention measures along the value chain (production, manufacturing and processing, retail, households and other businesses)</p> <p>2. Member States shall report on the data concerning the implementation of paragraph 1 to the European Commission and European Environmental Agency every year</p>

Justification:

Considering that textile products are the [EU's fourth largest cause of negative environmental impacts after food, housing and transport](#) (according to the European Environmental Agency), the absence of provisions when it comes to prevention poses a significant gap. In the EU Strategy for Sustainable and Circular Textiles, overproduction and fast fashion are identified as the main problems to be addressed. As long as waste prevention measures are absent in the proposal for textiles, any legislation will have little effect on the actual problem.

MWE Amendment 4

Expanding to textiles and textile waste beyond households

Commission proposal	MWE amendments
<p>Article 22a paragraph 1 Member States shall ensure that producers have extended producer responsibility for household textile products, articles of apparel, clothing accessories and footwear, apparel and clothing accessories listed in Annex IVc (“textile, textile-related and footwear products”) that they make available on the market for the first time within the territory of a Member State, in accordance with Articles 8 and 8a.</p>	<p>Article 22a paragraph 1 Member States shall ensure that producers have extended producer responsibility for household textile products, articles of apparel, clothing accessories and footwear, apparel and clothing accessories listed in Annex IVc (“textile, textile-related and footwear products”), <i>including unsold textile products and textile waste generated by social enterprises</i>, that they make available on the market for the first time within the territory of a Member State, in accordance with Articles 8 and 8a.</p>

Justification:

We propose to remove the reference to ‘household’ when referring to used textiles and textile waste in the entire proposal. This includes amendments to Article 22a and amendment to the Annex IVc in this paper.

The proposal repeatedly uses the term ‘household textiles’ to refer to those textile items disposed of by households, including apparel, clothing accessories, footwear, linens and upholstery. However, the term ‘households’ omits used textiles and textile waste generated in hotels, hospitals, restaurants, offices, schools and suchlike. It is important to amend the proposal from ‘household textiles’ to simply ‘textiles’ because where the textile item has been used and where the waste is generated should not be of any relevance to producer responsibility. Amending Article 22a, Annex IVc and any other reference to only household textiles, would thereby lead to the inclusion of all textile waste listed in Annex IVc regardless of its origin. Otherwise, the extended producer responsibility (EPR) would be linked only to textiles discarded by households, leaving out of its scope all textile waste similar in nature and composition to textile waste from households and that collected from other sources, disregarding the ‘Polluter Pays’ principle.

Further to that, social enterprises do not sell all items they collect for mainly two reasons: first, not all items donated by end-users in bags and their street collection bins are suitable for preparation-for-reuse or direct reuse due to weather damage, the condition of the items or the lack of means to clean or repair them. Second, it is also a matter of the market for second-hand textile products. There simply is not always demand in every market. When given one of these two scenarios, textiles that had been collected by social enterprises earlier should now end up in an efficient waste management system, meaning they should fall under EPR obligations. We should ensure that textile waste generated by social enterprises is not only collected but also covered by the EPR schemes.

In accordance with the ban on the destruction of unsold textile products under the Ecodesign of Sustainable Products Regulation, we consider it to be of paramount importance to include unsold textile products so that these items are covered by EPR schemes. Unsold textile products, if not correctly handled, may cause negative environmental impacts in the EU and beyond, therefore they should not be omitted from extended producer responsibility.

MWE Amendment 5

Power to set out Delegated Acts to amend Annex IVc should be deleted

Commission proposal	MWE amendment
<p>Article 22a, paragraph 2</p> <p>The Commission is empowered to adopt delegated acts in accordance with Article 38a to amend Annex IVc to this Directive in order to bring the Combined Nomenclature codes listed in Annex IVc to this Directive in line with the codes listed in Annex 1 to Council Regulation (EEC) No 2658/87*.</p>	<p>Article 22a, paragraph 2</p> <p><i>deleted</i></p>

Justification:

The list of textiles covered by this Directive has a direct effect on the quantity of textiles subject to separate collection and therefore directly impacts the design of separate collection, regularity of collection or emptying of containers and planned capacity for sorting and recycling. We therefore propose that full transparency is maintained by leaving any changes within the main Directive and subject to co-decision rather than restricting transparency by allowing such changes to be made in delegated acts.

MWE Amendment 6

EPR schemes: Undefined roles and responsibilities of municipalities

Commission proposal	MWE amendment
<p>Article 22a, paragraph 3</p> <p>Member States shall define in a clear way the roles and responsibilities of relevant actors involved in the implementation, monitoring and verification of the extended producer responsibility scheme referred to in paragraph 1.</p>	<p>Article 22a, paragraph 3 (i) new</p> <p>Member States shall define in a clear way the roles and responsibilities of relevant actors involved in the implementation, monitoring and verification of the extended producer responsibility scheme. ensure that local public authorities and local social enterprises are involved in the decision-making bodies of the extended producer responsibility scheme and in the implementation, monitoring and verification of the scheme referred to in paragraph 1.</p>

Justification:

The proposal does not clarify the role of local public authorities (municipalities). As household and similar textile waste is municipal waste there should be a mandatory involvement of municipalities in the implementation of EPR for textiles. This is missing in the proposal and needs to be added, especially to ensure a uniform, regional organisation of the separate collection of textiles by the municipalities with the involvement of local social enterprises. To ensure success of separate collection and treatment of textile waste, it is crucial that textile PROs are obliged to collaborate with municipalities and develop agreements with regard to collection and communication to citizens.

MWE Amendment 7

Social enterprises and waste status

Commission proposal	MWE amendment
<p>Article 22a, paragraph 4a.4 Member States shall ensure that the producers of textile, textile-related and footwear products listed in Annex IVc cover the costs of the following:</p> <p>(a) collection of used and waste textile, textile-related and footwear products listed in Annex IVc and subsequent waste management that entails the following:</p> <p>(4) collection, transport and treatment referred to in points (1) and (2) of waste generated by social enterprises and other non-waste operators that are part of the collection system referred to in Article 22c, paragraphs 5 and 11;</p>	<p>Article 22a, paragraph 4a.4 Member States shall ensure that the producers of textile, textile-related and footwear products listed in Annex IVc cover the costs of the following:</p> <p>(a) collection of used and waste textile, textile-related and footwear products listed in Annex IVc and subsequent waste management <i>that entails the following:</i></p> <p><i>(4) collection, transport and treatment referred to in points (1) and (2) of waste generated by social enterprises and other non-waste operators that are part of the collection system referred to in Article 22c, paragraphs 5 and 11;</i></p>

Justification:

In order to set up an effective separate collection and treatment system for textiles, all collection, transport and treatment of textiles must be under the waste status. Any exceptions to this from collection bins will build in loopholes and opportunities for illegal activity as well as creating an unstable investment environment for both public and private sectors for investments in the necessary EU - based sorting and recycling capacity. The end-of-waste status within sorting plants covers the needs of the social economy sector sufficiently. Ensuring a stable investment environment creates the opportunities needed to generate good quality EU jobs in collection, transport, sorting, reuse and recycling activities within a functioning circular economy. It must be clear here that there is a departure from articles 8 and 8a of the Waste Framework Directive which ensures that all costs are covered by the producer and not only part of those.

MWE Amendment 8

Producers' cost coverage should include communication work

Commission proposal	MWE amendment
<p>Article 22a, paragraph 4 (1) the collection of those used products for re-use and the separate collection of waste products for preparation for re-use and recycling in accordance with Articles 22c and 22d,</p>	<p>Article 22a, paragraph 4 subparagraph 1 (1) the collection of those used products for re-use and the separate collection of waste products for preparation for re-use and recycling in accordance with Articles 22c and 22d, <i>including necessary communication work,</i></p>

Justification:

We note that the proposal omits the cost of necessary communication activities for successful separate collection schemes. Without repeated, efficient and target communication to citizens, separate collection schemes are not successful. Having an efficient infrastructure is not enough to deliver effective, efficient separate collection for reuse, preparation-for-reuse and recycling. Constant communication (and not only temporary awareness-raising campaigns) are often not properly planned for and thus we suggest to explicitly embed it in the WFD.

MWE Amendment 9

Producers' cost coverage should include textiles remaining in mixed waste

Commission proposal	MWE amendment
Article 22a, paragraph 4	Article 22a, paragraph 4 new subparagraph (4i) <i>new(4) collection and waste treatment of the textile waste that remains in mixed municipal waste</i>

Justification:

Producers should bear the costs of collection and treatment of textile waste that remains in the mixed waste stream. Including this textile waste in producer responsibility obligations will ensure that sufficient incentives are given by the producer to sort out textile waste into the separate stream for collection rather than throwing it out with mixed waste. Higher quality textiles are also more likely to be properly sorted so the coverage of these costs by producer responsibility can also be seen as a practice-based modulated fee. This requirement also ensures that the citizen is not burdened with the cost of an inefficient collection, sorting and recycling system.

MWE Amendment 10

Producers' cost coverage should include promotion of textile waste prevention

Commission proposal	MWE amendment
Article 22a, paragraph 4	Article 22a, paragraph 4 new subparagraph (f) <i>new(f) Awareness raising and advertising to promote textile waste prevention</i>

Justification:

We note that the proposal omits the cost of necessary communication activities for textile waste prevention.

MWE Amendment 11

Obligatory separate collection and Extended Producer Responsibility: Lack of synchronisation and clarity

Commission proposal	MWE amendment
Article 22a, paragraph 8 Member States shall ensure that the extended producer responsibility schemes laid down in paragraph 1 of this Article are established by [P.O insert date thirty months after the entry into force of this amending Directive] in accordance with Articles 8, 8a, 22a to 22d.	Article 22a, paragraph 8 Member States shall ensure that the extended producer responsibility schemes laid down in paragraph 1 of this Article are established <i>immediately on adoption of this Directive</i> , in accordance with Articles 8, 8a, 22a to 22d.

Justification:

Deadlines for the obligation of separately collect textiles and the deadline for the obligation to set up an extended producer responsibility scheme do not fit. We have concerns on the long adoption and transition period for EPR for textiles that would greatly exceed the separate collection deadline. Member States are obliged to collect textiles separately by 1

January 2025. However, according to the proposal, Member States would be obliged to establish an EPR scheme by 30 months after the entry into force of this amending Directive, what means that the EU will not have an effective mandatory EPR until 2027 or 2028. The question is who would cover the cost of necessary infrastructure, labour, and communication to citizens, commerce and industry; essential aspects to affect efficient separate collection by 1 January 2025? For this reason, we suggest an immediate implementation on adoption, which will most likely happen after 1 January 2025.

MWE Amendment 12

Obligatory separate collection and Extended Producer Responsibility: Lack of synchronisation and clarity

Commission proposal	MWE amendment
	<p>Article 22a, new paragraph 8(i) <i>Producer responsibility organisations shall reimburse all the costs related to the separate collection of textile waste, listed in Article 22a, paragraph 4, from the entry into force of the obligation to collect separately textile waste (1 January 2025) to the set-up of the producer responsibility organisations.</i></p>

Justification:

Deadlines for the obligation of separately collected textiles and the deadline for the obligation to set up an extended producer responsibility scheme do not fit. We have concerns on the long adoption and transition period for EPR for textiles that would greatly exceed the separate collection deadline. Member States are obliged to collect textiles separately by 1 January 2025. However, according to the proposal, Member States would be obliged to establish an EPR scheme by 30 months after the entry into force of this amending Directive, what means that the EU will not have an effective mandatory EPR until 2027 or 2028. The question is who would cover the cost of necessary infrastructure, labour, and communication to citizens, commerce and industry; essential aspects to affect efficient separate collection by 1 January 2025? For this reason, we suggest an immediate implementation on adoption, which will most likely happen after 1 January 2025 in any case and an obligation for producers to reimburse all costs from the time when mandatory separate collection comes into force (1 January 2025).

Additional MWE Amendment (12i)

Ecomodulated fees for Part 2 of the Annex IVc:

Commission proposal	MWE amendment
<p>Article 22c, paragraph 3(a)</p> <p>(a) are based on the weight of the products concerned and, for textile products listed in Part 1 of Annex IVc, are modulated on the basis of the ecodesign requirements adopted pursuant to the Regulation .../... of the European Parliament and of the Council [P.O. insert the serial number for the Ecodesign for Sustainable Products Regulation when adopted]** that are most relevant for</p>	<p>Article 22c, paragraph 3(a)</p> <p>(a) are based on the weight of the products concerned and, for textile products listed in Part 1 and Part 2 of Annex IVc, and are also modulated on the basis of the ecodesign requirements adopted pursuant to the Regulation .../... of the European Parliament and of the Council [P.O. insert the serial number for the Ecodesign for Sustainable Products Regulation when adopted]** that are most relevant for the prevention of textile waste and</p>

the prevention of textile waste and for the treatment of textiles in line with the waste hierarchy and the corresponding measurement methodologies for those criteria adopted pursuant to that Regulation or on the basis of other Union law establishing harmonised sustainability criteria and measurement methods for textile products, and that ensure the improvement of environmental sustainability and circularity of textiles;	for the treatment of textiles in line with the waste hierarchy and the corresponding measurement methodologies for those criteria adopted pursuant to that Regulation or on the basis of other Union law establishing harmonised sustainability criteria and measurement methods for textile products, and that ensure the improvement of environmental sustainability and circularity of textiles;
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Justification:

We do not find a reason to exclude from the eco-modulated fees footwear, leather-made apparel and clothing accessories or apparel and accessories whose main composition is not 'textile'.

MWE Amendments 13

Producer Responsibility Organisation to be involved in appropriate handling of 'unsold textile products'

Commission proposal	MWE amendment
	<p>Article 22c, new paragraph 5(i)</p> <p><i>Member States shall ensure that the producer responsibility organisations establish a separate collection system for unsold textile products regardless of their nature, material composition, condition, name, brand, trademark or origin, in the territory of a Member State where they have been stored. Unsold textile products shall be handled in accordance with the waste hierarchy.</i></p>

Justification:

We repeat here justification for MWE Amendment 2:

In accordance with the ban on the destruction of unsold textile products under the Ecodesign of Sustainable Products Regulation (in the EU Parliament and Council's positions), we consider it to be of paramount importance to include unsold textile products so that these items are covered by EPR schemes. Unsold textile products, if not correctly handled, may cause negative environmental impacts in the EU and beyond, therefore they should not be omitted from extended producer responsibility.

MWE Amendment 14

Unsold textile products should not account for reuse obligations

Commission proposal	MWE Amendment
	<p>Article 22c, new paragraph 5(ii)</p> <p><i>Producers of textile, textile-related and footwear products listed in Annex IVc shall not use unsold textile product quantities to account for the achievement of their reuse obligations.</i></p>

Justification:

Unsold textile products are the consequence of low production costs and unsustainable production and business models which lead to 30-50% returns from online sales. These returns are discarded as waste today as this is cheaper than sorting, repacking them and returning them to the shelves for sale. Reuse obligations should not serve as an excuse to continue this over-production model that promotes overconsumption and contributes to environmental damage and climate change.

MWE Amendment 15

Social enterprises and waste status

Commission proposal	MWE amendment
<p>Article 22c, paragraph 5c Member States shall ensure that the producer responsibility organisations establish a separate collection system for used and waste textile, textile-related and footwear products listed in Annex IVc, regardless of their nature, material composition, condition, name, brand, trademark or origin, in the territory of a Member State where they make those products available on the market for the first time. The separate collection system shall:</p> <p>(c) ensure the collection, free of charge, of waste generated by social enterprises and other non-waste operators from such textile, textile-related and footwear products collected through the connected collection points.</p>	<p>Article 22c, paragraph 5c Member States shall ensure that the producer responsibility organisations establish a separate collection system for used and waste textile, textile-related and footwear products listed in Annex IVc, regardless of their nature, material composition, condition, name, brand, trademark or origin, in the territory of a Member State where they make those products available on the market for the first time. The separate collection system shall:</p> <p>(c) ensure the full coordination between social enterprises and producer responsibility organisations to ensure collection, free of charge, of waste generated by social enterprises and other non-waste operators of such textile, textile-related and footwear products collected through the connected collection points.</p>

Justification:

Social enterprises collecting used and waste textiles must be subject to the same rules as any waste operator collecting used and waste textiles in order to ensure limitation of illegal activities, particularly shipments and dumping, as well as to ensure sufficient investment in treatment facilities. Being fully within the EPR system must also give social enterprises the right to full compensation from the EPR system (Producer Responsibility Organisations-PROs) to reimburse their costs of collection and transport, in the same way as this is applicable to municipalities. This is true coordination with and inclusion of social enterprises in the textile recovery system.

MWE Amendment 16

EPR schemes: Undefined roles and responsibilities of municipalities

Commission proposal	MWE amendment
<p>Article 22c, paragraph 6 Member States shall ensure that the collection system referred to in paragraph 5:</p> <p>(a) consists of collection points set up by the producer responsibility organisations and waste management</p>	<p>Article 22c, paragraph 6 Member States shall ensure that the collection system referred to in paragraph 5:</p> <p>(a) consists of collection points set up by the producer responsibility organisations and waste management</p>

operators on their behalf in cooperation with one or more of the following: social enterprises and social economy entities, distributors, public authorities or third parties carrying out collection on their behalf of used and waste textile, textile-related and footwear products listed in Annex IVc, and other voluntary collection points;	operators on their behalf in cooperation with one or more of the following : social enterprises and social economy entities, distributors, public authorities or third parties carrying out collection on their behalf of used and waste textile, textile-related and footwear products listed in Annex IVc, and other voluntary collection points;
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Justification:

All relevant actors should be involved in the decision-making. PROs should not choose to cooperate with just one actor or exclude others and thus we do not see the need to add 'one or more of the following' in this paragraph.

MWE Amendment 17

Calculation of separate collection rates

Commission proposal	MWE amendment
<p>Article 22c, paragraph 8</p> <p>The separate collection rate referred to in paragraph 6, point (c) shall be calculated as the percentage obtained by dividing the weight of waste textile, textile-related and footwear products listed in Annex IVc collected in accordance with paragraph 5 in a given calendar year in a Member State by the weight of such waste textile, textile-related and footwear products that is generated and collected as mixed municipal waste.</p>	<p>Article 22c, paragraph 8</p> <p>The separate collection rate referred to in paragraph 6, point (c) shall be calculated as the percentage obtained by dividing the weight of <i>separately collected</i> waste textile, textile-related and footwear products listed in Annex IVc, collected in accordance with paragraph 5 in a given calendar year in a Member State, by the weight of such waste textile, textile-related and footwear products that is generated and collected as mixed municipal waste.</p>

Justification:

This paragraph is long and confusing, we suggest making it clearer. It is important to note that not only household textile waste should be considered but also textiles from other sources such as hotels, hospitals, restaurants, offices and other such premises, which generate similar textile waste as that generated by individual consumers and households. This is solved with MWE Amendment 32 (reference to 'household' is removed from the Annex IVc), which remains in accordance with this MWE Amendment 17.

MWE Amendment 18

Producer Responsibility Organisations (PROs): Undefined roles and responsibilities of municipalities

Commission proposal	MWE amendment
<p>Article 22c, paragraph 10</p> <p>Member States shall ensure that producer responsibility organisations are not allowed to refuse the participation of social enterprises and other re-use operators in the separate collection system established pursuant to paragraph 5.</p>	<p>Article 22c, paragraph 10</p> <p>Member States shall ensure that producer responsibility organisations are not allowed to refuse the participation of <i>local public authorities</i>, social enterprises and other re-use operators in the separate collection system established pursuant to paragraph 5.</p>

Justification:

The proposal does not clarify the role of local public authorities. As household and similar textile waste is municipal waste there should be a mandatory involvement of municipalities in the implementation of EPR for textiles. This is missing in the proposal and needs to be added, especially to ensure a uniform, regional organisation of the separate collection of textiles by the municipalities with the involvement of local social enterprises. We would like to ensure that PROs are obliged to collaborate with municipalities and develop agreements with regard to collection and communication to citizens.

MWE Amendment 19

PROs: Undefined roles and responsibilities of municipalities

Commission proposal	MWE amendments
<p>Article 22c, paragraph 11 Without prejudice to paragraph 5, points (a) and (b), and paragraph 6, point (a), Member States shall ensure that social enterprises are allowed to maintain and operate their own separate collection points and that they are given equal or preferential treatment in the location of the separate collection points. Member States shall ensure that social enterprises and social economy entities that are part of the connected collection points in accordance with paragraph 6, point (a) are not required to hand over collected used and waste textiles, textile-related and footwear products listed in Annex IVc to the producer responsibility organisation.</p>	<p>Article 22c, paragraph 11 Without prejudice to paragraph 5, points (a) and (b), and paragraph 6, point (a), Member States shall ensure that social enterprises are allowed to maintain and operate their own separate collection points and that they are given equal or preferential treatment in the location of the separate collection points. Member States shall ensure that local public authorities and social enterprises, and social economy entities that are part of the connected collection points in accordance with paragraph 6, point (a) are not required to hand over collected used and waste textiles, textile-related and footwear products listed in Annex IVc to the producer responsibility organisation.</p>

Justification:

The proposal does not clarify the role of local public authorities. As household and similar textile waste is municipal waste there should be a mandatory involvement of municipalities in the implementation of EPR for textiles. This is missing in the proposal and needs to be added, especially to ensure a uniform, regional organisation of the separate collection of textiles by the municipalities with the involvement of local social enterprises. We would like to ensure that PROs are obliged to collaborate with municipalities and develop agreements with regard to collection and communication to citizens. Further to that, ‘social enterprises’ and ‘social economy’ is an unnecessary repetition.

Social enterprises should not be obliged to hand over used textiles to PROs, before or after sorting as such social enterprises make these used textiles available either for sale as second hand textiles or by donation to those in need. However, it is as important that the waste textiles not eligible for reuse but destined for recycling or destruction are delivered to the relevant PRO and its contracted waste treatment installations. This is relevant to planning for treatment capacity, related investments to ensure sufficient treatment capacity within the EU and to avoid illegal shipments.

MWE Amendment 20

Permit/registration obligations for social enterprises

Commission proposal	MWE amendment
<p>Article 22c, paragraph 12</p> <p>Member States shall ensure that collection points set up in accordance with paragraphs 5, 6 and 11 are not subject to the registration or permit requirements of this Directive.</p>	<p>Article 22c, paragraph 12</p> <p>Member States shall ensure that collection points set up in accordance with paragraphs 5, 6 and 11 are not subject to the registration and or permit requirements of this Directive.</p>

Justification:

Separately collected textile waste is not a by-product from a production process and therefore Art. 5 does not apply. In order to ensure that sufficient organisation and investment is put in place to ensure the separate collection and treatment of textile waste takes place, it is important to ensure that all textiles collected in bins, whether door to door, bring system or in a civic amenity site are subject to the waste status and permit obligations. This will ensure that illegal shipments of waste textiles leaving the EU under the label of 'used textiles' are limited through the notification requirements of having waste status. Art 6 (End-of-waste) for textiles for reuse is established and implemented within the textile sorting plants, where three streams will be sorted: for reuse, which leave the waste status, for recycling and rejects which continue as wastes for further treatment. This sorting process also implements Art. 11 (preparation for reuse and recycling). Social enterprises can maintain their separate collection of textiles activities, under the waste status and permitting, they may carry out sorting operations to remove preparing for re-use textiles while having the obligation to deliver the remaining two fractions to the relevant waste treatment facilities.

MWE Amendment 21

Collaboration between Municipalities and PROs on communication work

Commission proposal	MWE amendment
<p>Article 22c, paragraph 14</p> <p>Member States shall ensure that the producer responsibility organisation provide the information referred to in paragraph 13 on a regular basis, that the information is up to date and provided by means of:</p> <ul style="list-style-type: none"> (a) a website or other means of electronic communication; (b) information in public spaces; (c) education programmes and campaigns; (d) signposting in a language, or languages, which can be easily understood by users and consumers. 	<p>Article 22c, paragraph 14</p> <p>Member States shall ensure that the producer responsibility organisation, in cooperation with municipalities, provide the information referred to in paragraph 13 on a regular basis, that the information is up to date and provided by means of:</p> <ul style="list-style-type: none"> (a) a website or other means of electronic communication; (b) information in public spaces; (c) education programmes and campaigns; (d) signposting in a language, or languages, which can be easily understood by users and consumers.

Justification:

Cooperation of the PROs with municipalities on all communication, in particular to consumers and end users is important for the success of a separate collection system because the consumer identifies their municipality as the responsible party for the collection of their waste. In case of questions the consumer will turn to their municipality for answers and expect communication on what to do and why to come from their municipality. Municipalities also have first-hand knowledge of

the sorting behaviour of their population and are thereby equipped with the necessary information to design an effective communication campaign with the desired results of achieving a higher degree of separate collection both in quality and quantity. Cooperation on communication between PROs and municipalities will ensure that all aspects of the management of the waste stream are accounted for.

MWE Amendment 22

PROs reporting of waste amounts

Commission proposal	MWE amendment
<p>Article 22c, paragraph 17</p> <p>Member States shall ensure that producer responsibility organisations publish on their websites, in addition to the information referred to in Article 8a(3), point (e):</p> <p>(a) at least each year, subject to commercial and industrial confidentiality, the information on the amount of products placed on the market, the rate of separate collection of used and waste textile, textile-related and footwear products listed in Annex IVc, including such unsold products, on the rates of re-use, preparation for re-use and recycling, specifying separately the rate of fibre-to-fibre recycling, achieved by the producer responsibility organisation, and on the rates of other recovery, disposal and exports;</p>	<p>Article 22c, paragraph 17</p> <p>Member States shall ensure that producer responsibility organisations publish on their websites, in addition to the information referred to in Article 8a(3), point (e):</p> <p>(a) at least each year, subject to commercial and industrial confidentiality, the information on the amount of products placed on the market, the rate of separate collection of used and waste textile, textile-related and footwear products listed in Annex IVc, including such unsold textile products and quantities of textile waste collected from social enterprises, on the rates of re-use, preparation for re-use and recycling, specifying separately the rate of fibre-to-fibre recycling, achieved by the producer responsibility organisation, and on the rates of other recovery, disposal and exports;</p>

Justification:

Waste data collection and transparency on behalf of all the actors involved in the value chain is a big issue for several Member States. Member States cannot properly calculate waste textile amounts if the rejects generated by social enterprises are not reported. In accordance with MWE Amendment 15, PROs should collect the textile waste generated by social enterprises when social enterprises need to reject items that are not reusable or due, for example, to over-capacity/lack of demand for second-hand items locally or internationally or simply due to the impossibility of repair; an obligation on reporting of these quantities is missing.

MWE Amendment 23

PROs reporting of waste amounts

Commission proposal	MWE amendment
<p>Article 22c, paragraph 17</p>	<p>Article 22c, paragraph 17, NEW subparagraph (c)</p> <p>(c) The European Commission shall audit the website every 2 years.</p>

Justification:

In order to ensure reliability of the data and verification by a third, independent party, it is necessary to include this obligation on the European Commission to audit the quantities of waste for reuse, recycling and destruction ('destruction', as defined in the Ecodesign Regulation for Sustainable Products) reported by the PROs each year. The obligation can also be carried out by the European Environment Agency which has the capacity to collect and analyse data.

MWE Amendment 24

Lack of a clear mandate on separate collection coverage

Commission proposal	MWE amendment
<p>Article 22d paragraph 1 Member States shall ensure, by 1 January 2025 and subject to Article 10(2) and (3), the separate collection of textiles for re-use, preparation for re-use and recycling.</p>	<p>Article 22d paragraph 1 Member States shall ensure, by 1 January 2025 and subject to Article 10(2) and (3), the separate collection of textiles products listed in Annex IVc for re-use, preparation for re-use and recycling.</p>

Justification:

The reference to Annex IVc is missing in Article 22d, paragraph 1. The mandate on separate collection should be clearly linked to Annex IVc.

MWE Amendment 25

Lack of a clear mandate on the separate collection coverage

Commission proposal	MWE amendment
<p>Article 22d paragraph 3 Member States shall ensure that used and waste textiles, textile-related and footwear products that are separately collected in accordance with Article 22c(5) are considered waste upon collection.</p>	<p>Article 22d paragraph 3, first subparagraph Member States shall ensure that separately collected used and waste textiles, textile-related and footwear products that are separately collected, in accordance with Article 22c(5) and referred to paragraph 1 of this Article, are considered waste upon collection.</p>

Justification:

The first subparagraph within paragraph 3 should refer to Article 22d paragraph 1 to properly link it with the mandate for separate collection.

MWE Amendment 26

Lack of a clear mandate on the separate collection coverage

Commission proposal	MWE amendment
<p>Article 22d paragraph 3</p> <p>With regard to textiles other than the products listed in Annex IVc, as well as unsold textile, textile-related and footwear products listed in Annex IVc, Member States shall ensure that the different fractions of textiles materials and textiles items are kept separate at the point of waste generation where such separation facilitates subsequent re-use, preparation for re-use or recycling, including fibre-to-fibre recycling where technological progress allows.</p>	<p>Article 22d paragraph 3</p> <p>With regard to <i>If a Member State decides to also separately collect textiles other than the products listed in Annex IVc, as well as unsold textile products, textile-related and footwear products listed in Annex IVc, Member States shall ensure that Articles 8, 8a, 22a to 22d also apply for those materials collected.</i></p> <p>Member States shall ensure that the different fractions of textiles materials and textiles items are kept separate at the point of waste generation where such separation facilitates subsequent re-use, preparation for re-use or recycling, including fibre-to-fibre recycling where technological progress allows.</p>

Justification:

The possibility for Member States to collect other textiles other than those in the Annex IVc, as written in the Commission proposal, will cause a misalignment between the scope of extended producer responsibility and separate collection obligation. Therefore, we suggest that a clear reference to those Articles which lay down the legal framework for EPR and PROs is made in the WFD.

MWE Amendment 27

Lack of a clear mandate on the separate collection coverage

Commission proposal	MWE amendment
<p>Article 22d paragraph 3</p>	<p>Article 22d paragraph 3 new subparagraph</p> <p><i>Member States shall ensure that producer responsibility organisations properly handle unsold textile products to fulfil their extended producer responsibility obligations in accordance with Articles 8, 8a 22a to 22d.</i></p>

Justification:

We repeat here the justification for MWE Amendments 2, 4, 13, 14 and 31.

MWE Amendment 28

Prioritising local preparation-for-reuse and reuse

Commission proposal	MWE amendment
Article 22d paragraph 5	Article 22d paragraph 5, new subparagraph (ai) <i>new(a) the sorting operation shall follow the principle of proximity, prioritising local sorting and avoiding environmental impacts caused by transportation;</i>

Justification:

Local sorting and local preparation-for-reuse activities, following the proximity principle, are a way to support local job creation and to avoid environmental impacts derived from transport.

MWE Amendment 29

Prioritising local preparation-for-reuse and reuse

Commission proposal	MWE amendment
<p>Article 22d paragraph 5</p> <p>Member States shall ensure that sorting operations of used and waste textile, textile- related and footwear products that are separately collected in accordance with Article 22c(5) comply with the following requirements:</p> <p>(a) the sorting operation is to generate textiles for re-use and preparation for re- use;</p>	<p>Article 22d paragraph 5, new subparagraph (ai)</p> <p>Member States shall ensure that sorting operations of used and waste textile, textile- related and footwear products that are separately collected in accordance with Article 22c(5) comply with the following requirements:</p> <p>(a) the sorting operation is to generate textiles for re-use and preparation for re-use, <i>prioritising local preparation for re-use and reuse networks;</i></p>

Justification:

Local sorting and local preparation-for-reuse activities, following the proximity principle, are both a way to both support local job creation and avoid environmental impact derived from transport.

MWE Amendment 30

Compositional studies on mixed waste

Commission proposal	MWE amendment
<p>Article 22d, paragraph 6</p> <p>By 31 December 2025 and every 5 years thereafter, Member States shall carry out a compositional survey of collected mixed municipal waste to determine the share of waste textiles therein. Member States shall ensure that, on the basis of the information obtained, the competent authorities may require the producer responsibility organisations to take corrective action to increase their network of collection points and carry out information</p>	<p>Article 22d, paragraph 6</p> <p>By 31 December 2025 and every 5 6 years thereafter, Member States shall carry out a compositional survey of collected mixed municipal waste to determine the share of waste textiles therein. Member States shall ensure that, on the basis of the information obtained, the competent authorities may require the producer responsibility organisations to take corrective action to increase their network of collection points and carry out information</p>

campaigns in accordance with Article 22c(13) and (14).	campaigns in accordance with Article 22c(13) and (14).
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Justification:

The frequency of the revision of the Waste Prevention Programmes (WPP) is every 6 years. We find that the timeline for the revision of the WPP should fit the frequency of the compositional studies.

MWE Amendment 31

Producer Responsibility Organisation to be involved in appropriate handling of ‘unsold textile products’

Commission proposal	MWE amendments
<p>Article 22d paragraph 15 Where, in a Member State, multiple producer responsibility organisations are authorised to fulfil extended producer responsibility obligations on behalf of producers, Member States shall ensure that they cover the whole territory of the Member State of the separate collection system for used and waste textile, textile-related and footwear products listed in Annex IVc. Member States shall entrust the competent authority or appoint an independent third party to oversee that producer responsibility organisations fulfil their obligations in coordinated manner and in accordance with the Union competition rules.</p>	<p>Article 22d paragraph 15 Where, in a Member State, multiple producer responsibility organisations are authorised to fulfil extended producer responsibility obligations on behalf of producers, Member States shall ensure that they cover the whole territory of the Member State of the separate collection system for used and waste textile, textile-related and footwear products listed in Annex IVc, <i>unsold textile products and textile waste generated by social enterprises</i>. Member States shall entrust the competent authority or appoint an independent third party to oversee that producer responsibility organisations fulfil their obligations in a coordinated manner and in accordance with the Union competition rules.</p>

Justification:

Social enterprises do not sell all items they collect for mainly two reasons: first, not all items donated by end-users are suitable for preparation-for-reuse or direct reuse due to the bad conditions of the item or the lack of means to clean it or repair it. Second, it is also a matter of market for second-hand textile products. They simply do not always have demand. When given one of these two scenarios, textiles that had been collected by social enterprises earlier should now end up in a efficient waste management system, meaning they should be fall under EPR obligations. We should ensure that textile waste generated by social enterprises is not only collected but also covered by the EPR schemes.

In accordance with the ban on the destruction of unsold textile products under the Ecodesign of Sustainable Products Regulation, we consider it to be of paramount importance to include unsold textile products so that these items are covered by EPR schemes. Unsold textile products, if not correctly handled, may cause negative environmental impacts in the EU and beyond, therefore they should not be omitted from extended producer responsibility.

MWE Amendment 32

Expanding to textiles and textile waste beyond households

Commission proposal	MWE amendment
<p>ANNEX IVc Products that fall within the scope of the extended producer responsibility for certain textile, textile-related and footwear products Part 1 Household textile products, and textile articles of apparel and clothing accessories that fall within the scope of Article 22a</p>	<p>ANNEX IVc Products that fall within the scope of the extended producer responsibility for certain textile, textile-related and footwear products Part 1 Household Textile products, and textile articles of apparel and clothing accessories that fall within the scope of Article 22a</p>

Justification:

We propose to remove the reference to 'household' when referring to used textiles and textile waste in the entire proposal. This includes amendments to Article 22a and amendment to the Annex IVc.

The proposal repeatedly uses the term 'household textiles' to refer to those textile items disposed of by households, including apparel, clothing accessories, footwear, linens and upholstery. However, the term 'households' omits used textiles and textile waste generated in hotels, hospitals, restaurants, offices, schools and suchlike, so excluding commercial and industrial textiles. It is important to amend the proposal from 'household textiles' to simply 'textiles' because where the textile item has been used and where the waste is generated should not be of any relevance to producer responsibility. Amending Article 22a, Annex IVc and any other reference to only household textiles, would thereby lead to the inclusion of all textile waste listed in Annex IVc regardless of its origin. Otherwise, the extended producer responsibility (EPR) would be linked only to textiles discarded by households, leaving out of its scope all textile waste similar in nature and composition to textile waste from households and that collected from other sources, disregarding the 'Polluter Pays' principle.

Conclusion:

The obligations are the requirements set out in this Directive which do not consider the sorting and treatment of recyclables from mixed waste as recycling for example in the case of biowaste as the resulting compost would spread contamination from the mixed waste to land causing environmental damage, which this Directive was created to prevent. The aim of this Directive is to collect, reuse and recycle a maximum of waste materials as secondary raw materials while limiting contamination of other resources during the collection and treatment phases and maximising the uptake of secondary raw materials into new products within a circular economy.

Eco-modulation of fees under the EPR-scheme for textiles (Article 22c, paragraph 4)

The Commission has stated in its textile strategy that it wants "fast fashion" out of fashion. For this to happen, measures that work are needed to reduce irresponsible production and consumption and stimulate longevity of already produced items.

We have little faith that a producer responsibility scheme, such as that proposed by the Commission with an average remuneration of 12 eurocents per garment, will contribute to this goal, unless it is followed up with more ambitious eco-modulation, where, for example, longevity is rewarded. Extending the lifespan of items will be in line with the waste hierarchy and should be rewarded with reduced fees via eco-modulation. Fast fashion producers on the other hand would

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be charged a higher eco-modulated fee to discourage further production. All this would be applied through the Extended Producer Responsibility system.

A positive side of the Commission's proposal is the requirement for the member states to carry out more waste analyses for textiles (picking analysis), which is already a common practice for other waste fractions.

Using disposed textiles as a knowledge base for regulation, and to develop criteria for eco-modulation is becoming more and more important and not just for the textile waste stream. Waste analysis and audits can underpin several policy measures, which have been proposed, such as Product Environmental Footprint Category Rules (PEF), Ecodesign for Sustainable Products Regulation (ESPR), Textile Labelling Regulation, Digital Product Passport (DPP), Green Claims Directive, (GCD), as well as Extended Producer Responsibility (EPR) and the Waste Framework Directive (WFD).

The Commission has proposed to use the general criteria in the ecodesign directive as a basis for eco-modulation. This may end up favouring cheap synthetics and thus extend the fast fashion era. The reason is that durability is being used as an indicator to predict longevity, whereas the fact for textiles is that there is a negative correlation between durability and longevity¹.

Thanking you in advance for your consideration of the issues we raise and of our proposals,

Vanya Veras
Secretary General

¹ "USED, BUT NOT USED UP: Using textile waste to inform textile rating schemes - A suggestion for empirically based policy measures to reduce the environmental impacts of clothing and footwear", Consumption Research Norway (SIFO), 12. September 2023, <https://clothingresearch.oslomet.no/used-but-not-used-up/>