CIRFS
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MAKING TEXTILE RECYCLING WORK FOR EUROPE TO ACHIEVE A CIRCULAR ECONOMY MODEL FOR TEXTILES

Europe's textiles sector must urgently move towards circularity. This means making recycled textiles the standard, not the exception. CIRFS calls for ambitious yet realistic measures that will secure feedstock for recyclers, create incentives for investment, and ensure credibility through compliance. CIRFS calls on the EU Commission, the Members States and all the concerned stakeholders to level up the ambition for textile circularity. To achieve a truly circular economy and to mobilise the needed capital investments, Europe needs a mandatory 15% recycled content requirement at product level by 2030. This ambitious objective must be underpinned by best-in class separate collection and high-performance recycling.

Separate collection and producer responsibility

CIRFS calls for a 34% mandatory separate collection target by 2030 across the EU - matching the current rate already achieved in France[1] - which has had an EPR scheme for textiles since 2008. With the currently expected average processing yield in the range of 40%-45%[2], this would result in around 15% actual recycled content.

Recycling textiles starts with having enough material to work with. At present, too few textiles are collected, which limits recycling. To address this, the EU should introduce mandatory separate collection of textiles, supported by EU-wide Extended Producer Responsibility (EPR) schemes.

Under EPR, those placing products on the market must cover the costs of managing textile waste. This fairly applies the "polluter pays" principle, drives better product design, and ensures that the costs of waste management are shared appropriately.

An ambitious recycled content target

If the condition of a robust separate collection of textiles waste is met throughout the whole 27 Member States, the European fibres industry can deliver an ambitious 15% recycled content at product level by 2030. This must be measured through physical, polymer only mass balance approach, which ensures fair accounting and is already applied in other sectors, to prevent 'paper' transfers of recycled credits to unrelated products (e.g., allocating plastic-

[1] Refashion, 2024
[2] McKinsey & Company / Material Economics, *"Scaling textile recycling in Europe — turning waste into value"* - European Commission Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs (DG GROW), *"Study on the technical, regulatory, economic and environmental effectiveness of textile fibres recycling"*

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derived material to a non-plastic output or vice versa).At the same time, EU and national policymakers should provide financial support and incentives to accelerate the scale-up of recycling infrastructure within the EU borders. Bonus mechanisms should reward recycled fibres over virgin ones, using textiles discarded and recycled in the EU and concentrate on the key subject of the ESPR: performance requirements for the products in scope.

A clear simplification of all bureaucratic requirements in the textile waste collection, handling and recycling steps is needed, as well.

Transitional use of post-industrial waste

In the early years, the EU Member States will not yet collect enough post-consumer textiles to meet the demand. During this scale-up phase, it is essential that post-industrial waste (production scraps, offcuts) counts in the calculation towards the recycled content target. This transitional step will keep recycling plants supplied, fully operational and financially sustainable until sufficient post-consumer material becomes available.

The legal definition of post-industrial waste should clearly exclude unsold goods, which should never be destroyed but remain up for sale in the market or re-manufactured/upcycled.

Level playing field: traceability and compliance

Ambitious targets require reliable enforcement. For this, the EU needs a robust, harmonised, and user-friendly traceability system that can be applied consistently across Member States. Traceability is essential to verify compliance, build trust in reported data, and demonstrate real progress toward circularity goals. To achieve this, tools such as chain of custody models can be used to follow material flows from collection to final product, ensuring that recycled content claims are credible and not subject to double counting.

At the same time, the development of digital product passports offers an opportunity to provide detailed and accessible information on product composition, origin, and end-of-life options. These tools can bring transparency to the entire supply chain, but implementation must remain practical and proportionate, especially for SMEs.

Overly complex or costly systems risk discouraging compliance, whereas simple, harmonised solutions can drive wide adoption and support innovation across the sector.

In this context, it is essential to integrate a mass-balance approach for chemical recycling. Chemical recycling can process complex textile waste that mechanical recycling cannot, and it plays a crucial role in scaling up circularity in the fibre industry. However, the output is often mixed with virgin feedstock at different stages of production. Without a mass-balance system, it would be impossible to allocate recycled content accurately to end products.

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A recognised and harmonised mass-balance methodology based on well-established standards ensures that recycled material flows are tracked fairly, prevents double counting, and gives investors and consumers confidence in the claims being made. Importantly, adopting mass balance across the EU will encourage innovation, provide legal certainty, and enable SMEs to participate in recycling value chains without facing disproportionate administrative burdens.

Conclusion

CIRFS calls on EU policymakers to ensure that Europe's textiles strategy delivers on its circular economy goals by committing to:

- Mandatory separate collection of textiles (34% in each Member State by 2030) and harmonised EPR schemes.
- A mandatory 15% recycled content requirement at product level by 2030, verified through a robust chain-of-custody system, which ensures transparency.
- The adoption of physical polymer-only mass-balance in the calculation and monitoring of the recycled content.
- Transitional use of post-industrial waste until post-consumer feedstock is widely available.
- Financial support and bonus mechanisms for recycling of EU textile waste in the EU and incentives for higher yield recycling technologies.
- A robust and user-friendly traceability system to prove compliance that is seamless, interoperable and practical for big as well as for small companies.

With these measures, Europe can build a competitive and sustainable textile recycling industry that creates jobs, reduces waste, and strengthens the EU's industrial base.

About CIRFS:

CIRFS is the association for Europe's € 12.3 billion man-made fibres industry, representing the industry to the European authorities and providing the industry with a wide range of services. Its members cover about 70% of European man-made fibres output. It provides for around 20,000 jobs in ca. 250 plants. The ***European man-made fibres industry****, with a total production in 2023 of ca. 4.3 million tonnes, is the world's third largest in terms of output and one of the global leaders in terms of innovation and quality.*