A UK Textiles EPR System

A proposed structure for a UK system based on a review of operational and developing EPR schemes for textiles and other evidence

Prepared June 2026

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Executive Summary

Once seen as a niche policy used by a single country, textiles extended producer responsibility (EPR) is about to rapidly become the norm. Globally the number of countries operating live EPR systems for textiles is small. However, driven by the revised EU Waste Framework Directive[1] a large group of European countries is right now in the process of designing EPR schemes for textiles that will come into force over the next two to three years.

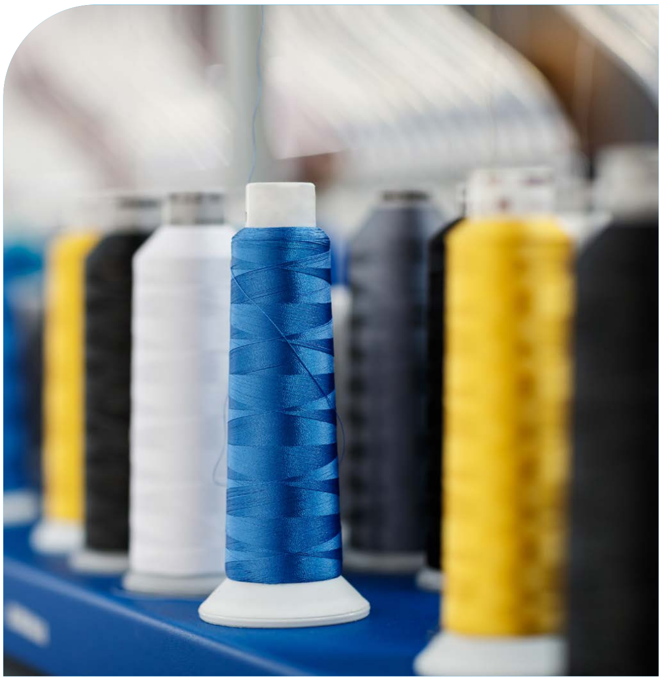
In the UK textiles EPR remains at the discussion/consultation stage with no EPR system for textiles yet decided. While many parameters govern the overall performance and efficiency of an EPR system, a critical overarching feature is its market/governance structure i.e. the degree of competition. EPR systems can be competitive with multiple PROs or monopoly systems run by state appointed entities or single PROs. The debate over which can best deliver the desired environmental outcomes at the lowest cost to producers appears far from settled.

In this paper we discuss textiles EPR systems currently in operation and available evidence on performance and costs from EPR approaches more generally. Alongside this is a detailed analysis of how UK competition law bears on the market structure question.

In terms of evidence, amongst the small number of operational systems there is no preferred model. Some empirical evidence can be found for and against competition in EPR systems. Our analysis shows the strongest arguments for competition (choice, cost efficiency, innovation, risk mitigation, competition law alignment) are well supported and reinforced by the UK's own regulatory and legal frameworks. A monopoly can be administratively simple. But other than that evidence for monopoly is weak/moderate and has methodological flaws.

In terms of competition law, the UK has the strongest competition enforcement regime in Europe, and the CMA's stated mission is to promote competitive markets for economic growth and household prosperity.

Designing in competition from the outset avoids risks and the potential cycle of monopoly formation, market power abuse, enforcement action, and forced restructuring. The UK has a long history of competitive compliance schemes for packaging EPR (pEPR - multiple schemes have operated since the 1990s), Waste Electrical and Electronic Equipment (WEEE) and (and of life) batteries. The new pEPR system launched in 2025 maintains the role of compliance schemes, although it introduces a centralised Scheme Administrator (PackUK/Defra) in relation to the provision of funding to Local Authorities in respect to household collections of packaging. This hybrid approach, central coordination with competitive compliance and choice, offers a viable alternative system for textiles EPR in the UK against the single, non-profit PRO in WRAP's Textiles Pact Blueprint.



[1]The revised Waste Framework Directive (entered into force on 16 October 2025) obliges all 27 EU Member states and requires transposition into national law by June 2027, with all Member states having functioning textile EPR schemes by April 2028. This converts the status of roughly two dozen national schemes from "developing" to "mandatory and imminent", with Spain, Italy, Germany, Sweden and Denmark among those already drafting national rules.

Our proposal is for a competitive system for UK textiles EPR, facilitated by robust central coordination and regulatory oversight, as follows:

- **Multiple licensed PROs** competing on service quality, innovation, fee levels, and mission
- **A central Scheme Administrator and regulator** to set standards, manage data reporting, enforce compliance, and ensure geographic coverage
- **Mandatory licensing conditions** requiring all PROs to provide universal geographic service and meet minimum performance standards
- **A clearing house mechanism** for allocation of collection volumes in shared infrastructure areas
- **Eco-modulated fee frameworks** set centrally, with PROs competing on administration and delivery
- **Mandatory independent reporting and auditing** of cost and performance data to enable benchmarking and continuous improvement
- **A central register** of producers and PROs to ensure full market coverage and minimise free-riding

This draws on the best elements of the UK Government's chosen approach to UK packaging EPR (central administrator with competing compliance schemes and producer choice), the textile EPR system in the Netherlands (competitive choice, mission differentiation), the German packaging EPR system (multiple PROs with central register), and avoids weaknesses identified in the French monopoly textile EPR (complacency, requirement for government intervention).

Evidence summary

Performance factor	Favours competition	Favours monopoly
Fee levels/ cost efficiency	Strong (Germany, Austria fee reductions)	
Recycling rates		Weak (flawed study for packaging)
Innovation & service quality	Strong (Netherlands differentiation, Germany)	
Geographic uniformity		Moderate (can be solved by regulation in competition)
Transparency & accountability	Strong (KPMG study, benchmarking)	
Administrative simplicity		Strong
Compliance simplicity		Moderate (A central register like Germany's ZSVR solves this without requiring a monopoly)
Risk of complacency	Strong (France eco-modulation failure)	
Risk of cherry-picking		Moderate (Germany issues, can be solved by regulation in competition
Fit with existing UK infrastructure	Strong (diverse collection system)	
Free-rider prevention	Neutral (requires a central register either way)	
Alignment with UK Competition Law	Strong (pEPR precedent, Competition Act, CMA powers)	

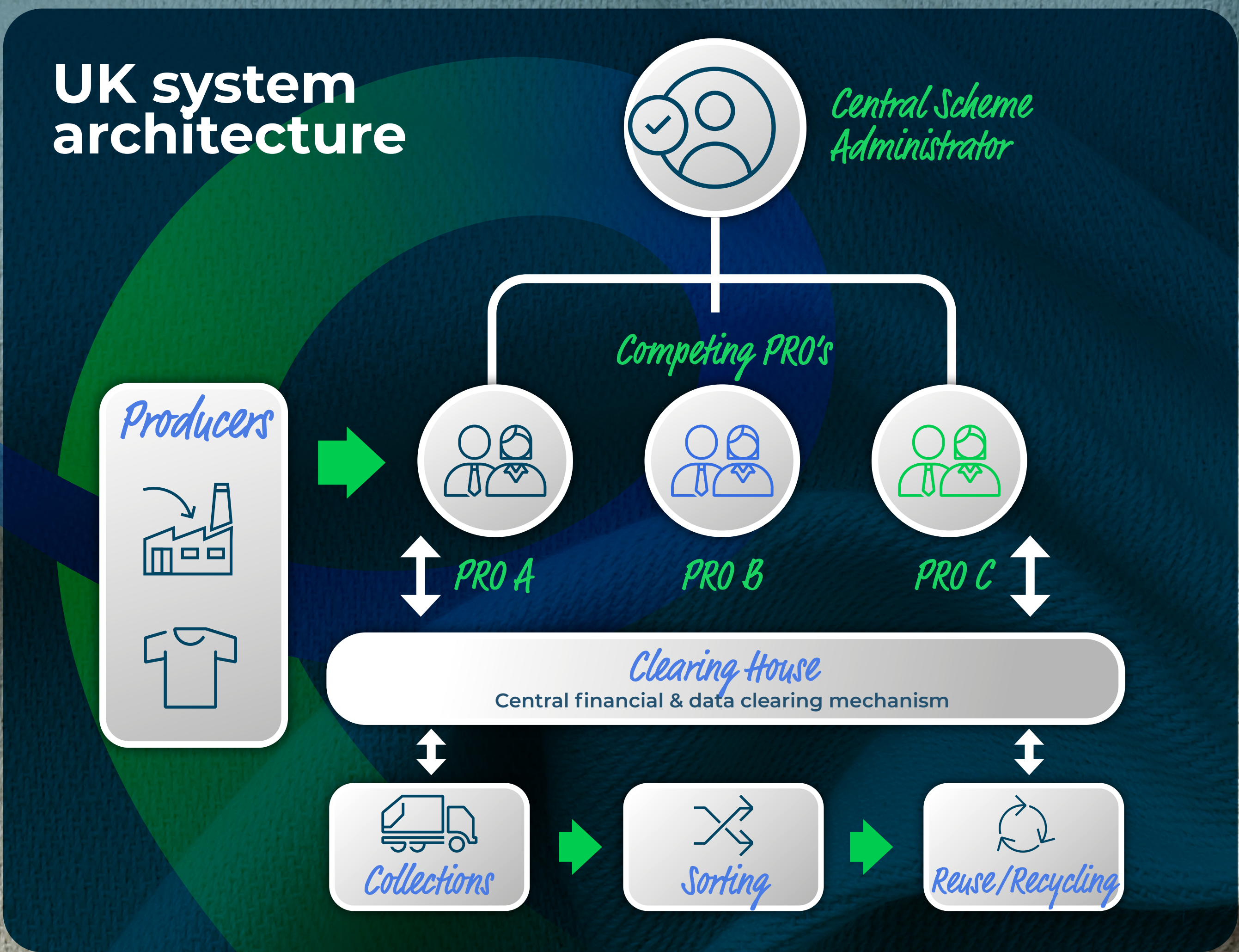
EPR systems for Textiles

In broad terms, the overarching objectives of EPR systems are similar, reducing textile waste and promoting circularity. Amongst the small number of operational systems there is no single preferred model to deliver this, and significant differences exist in current operational approaches, notably on the degree of producer choice and the balance between competition and centralisation (see Appendix I for details).

France has the most mature system, theoretically producers can arrange their own take-back but none do, so effectively EPR is dominated by a single PRO - Refashion. The Netherlands has multiple PROs with collective compliance organized centrally. In Hungary there is a legislated state-controlled monopoly with strong government oversight. EPR in Latvia operates alongside its Natural Resources Tax, producers can choose a PRO (as the majority have done) or pay the tax.

Australia has a voluntary, industry-led initiative which depends on widespread participation with Government threatening regulation if uptake is insufficient. And, in California, although at an early stage, producers choose a PRO and fund statewide collection and recycling systems.

The revision of the Waste Framework Directive requires transposition into national law by June 2027; operational national textile EPR schemes in all Member states by April 2028. From the details available on what is likely to be implemented all will be built around PROs with an even split between textile EPR systems with single PROs and systems with multiple PROs.



Research evidence

We considered published research studies to inform insights on the relative performance of alternative models for textiles EPR. Our literature review (summarised below) finds arguments for and against competition in EPR models although it should be noted that the review is mainly for non-textiles EPR due to a lack of evidence on the limited number of EPR systems for textiles where, in any case, infrastructure requirements are fundamentally different to that for other products.

In favour of competition, **Toyasaki et al. (2011)** look at the WEEE sector and find that recycler fees are mostly lower under competitive schemes, and that consumers and manufacturers generally prefer competition as it results in lower product prices and higher manufacturer profits. On the potential for competition to drive fee reductions **Kunz et al. (2018)** document that the introduction of competing PROs resulted in a 54% reduction in packaging recycling fees in Germany, and an 80% reduction in e-waste recycling fees in Austria. **Favot et al. (2022) and Niza et al. (2014)** find that a more competitive market structure is positively correlated with cost efficiency in WEEE systems. And **European Commission / BIO by Deloitte (2014)** identify that competitive systems can establish more cost-efficient collection strategies to increase market share compared to centralised monopolistic systems, with competitive systems also mitigating risks associated with excessive market power.

In favour of monopoly, **Rubio et al. (2019)** argue that economies of scale favour a single PRO, particularly for small countries where waste volumes may not support effective competition. For packaging **Colelli et al. (2022)** report that non-competitive systems achieved higher recycling rates (all materials combined) than competitive systems. In addition, the study finds that single PROs in non-competitive systems to be both more effective at packaging recycling and more cost-efficient than multiple PROs in competitive environments. However, it also finds packaging EPR systems to be more effective when local authorities shared operational responsibilities for collection (and this applies equally to competition and monopoly systems). Further to this, their analysis did not consider all relevent variables (a point acknowledged by the authors).

So while some empirical evidence can be found for and against competition in EPR systems, authoritative sources are inconclusive. Indeed, in their in-depth reviews of EPR systems **OECD (2016,2024)** observe that monopolistic and competitive models can both be successful but that there is insufficient empirical evidence to determine the conditions in which a monopoly or single PRO is more efficient than competition amongst multiple PROs.

UK Competition Law

Our assessment of the elements of competition law that are in favour of a competitive market structure for UK textiles EPR operates on two levels:

- **Principled level:** The UK has the strongest competition enforcement regime in Europe, and the CMA's stated mission is to promote competitive markets for economic growth and household prosperity. To implement a textile EPR system as a monopoly runs counter to decades of UK competition policy and the government's own growth agenda.

- **Practical level:** Monopoly PROs, even if well-intentioned and non-profit, inevitably acquire excessive market power that produces anti-competitive effects potentially facing competition law challenges, legislative reform and requiring costly intervention (see German DSD – A Cautionary Tale below). Designing in competition from the outset avoids this predictable cycle of monopoly formation, market power abuse, enforcement action, and forced restructuring.

The UK's own revised packaging EPR provides a precedent in that the government already decided on a hybrid model: central coordination with competitive compliance. This may suggest awareness of competition concerns and/or an implicit acknowledgement that a monopoly structure is not desirable for other reasons. The revised pEPR scheme launched in 2025 with PackUK appointed as the centralised Scheme Administrator and explicitly included a preserved role for multiple competing compliance schemes alongside PackUK.

German DSD – A Cautionary Tale

Perhaps the most instructive legal precedent for the UK to bear in mind comes from Germany's packaging EPR experience. Duales System Deutschland (DSD), which operated the "Green Dot" trademark system, was Germany's original single packaging PRO. The German Packaging Regulation did not explicitly prohibit competition but the onerous conditions for compliance schemes made a second system commercially unviable, giving DSD a very strong market position, a scenario closely analogous to what a UK single-PRO textile EPR could create.

The DSD monopoly attracted sustained criticism from both the German Federal Cartel Office and the European Commission. In April 2001, the European Commission formally ruled that DSD was restricting competition by abusing its dominant position in the market for organising the collection and recycling of sales packaging in Germany.

The specific abuse concerned DSD's practice of charging manufacturers the full licence fee for use of the "Green Dot" even if those manufacturers had separately contracted with competing collectors to handle their packaging waste. The effect was that customers had "no realistic economic possibility" of contracting with competitors. DSD appealed and lost before the EU Court of First Instance in 2007. The Court confirmed all of the Commission's findings. Following these decisions, competing systems were permitted to enter the German market, and the European Commission noted that prices for collection and recycling services fell "appreciably" as a result.

The DSD approach constituted, in the assessment by competition scholars, an appreciable restriction of competition, making DSD a monopoly player in the market for disposal services. The Federal Cartel Office's intervention, combined with the Commission's rulings, ultimately drove Germany's transformation from a single, non-profit PRO to a system with multiple competing for-profit PROs, a change triggered directly by antitrust enforcement.

The UK Competition Act 1998

Market dominance alone is not unlawful under UK law. However, dominant businesses carry what competition law terms a “special responsibility” not to allow their conduct to impair genuine undistorted competition. Commercial behaviour that would be perfectly legitimate for a business with a smaller market share may constitute abuse when undertaken by a dominant entity. The UK’s Competition Act 1998 contains two key prohibitions directly relevant to the design of a UK textiles EPR scheme:

- **Chapter I Prohibition - Anti-Competitive Agreements:** Chapter I prohibits agreements between undertakings, decisions by associations of undertakings, or concerted practices that have as their object or effect the prevention, restriction, or distortion of competition within the UK. If major textile producers were to collectively establish a single PRO this collective arrangement could constitute an “agreement between undertakings” or a “decision by an association of undertakings” that restricts competition. Producers agreeing to channel all their waste management obligations through a single entity, setting uniform fees, and collectively contracting with waste operators are activities that could attract scrutiny under Chapter I.

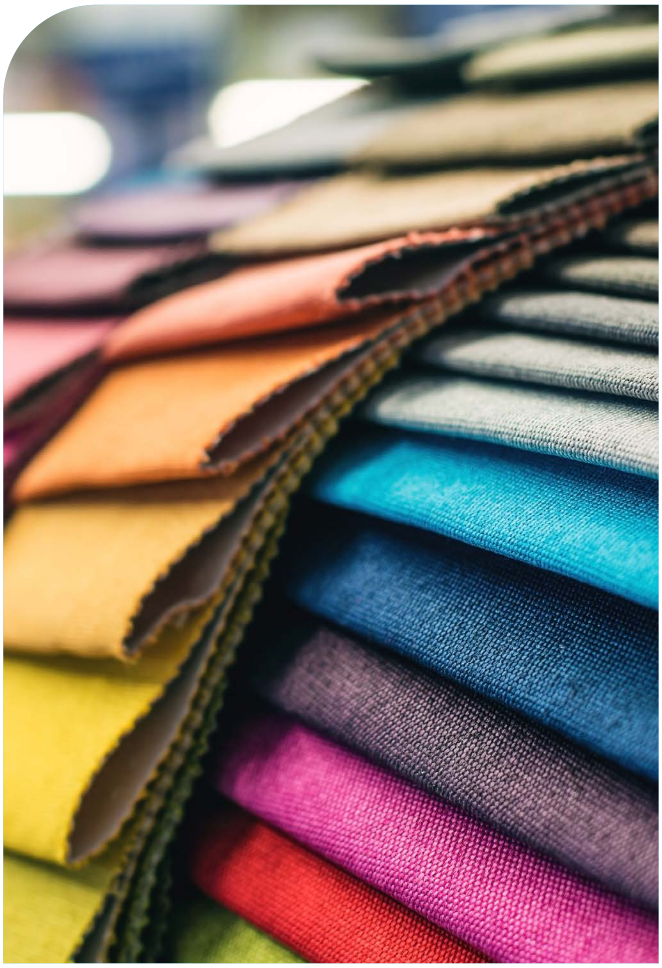
- **Chapter II Prohibition - Abuse of Dominant Position:** Chapter II provides that any conduct by one or more undertakings which amounts to the abuse of a dominant position in a market is prohibited if it may affect trade within the UK. Competition law guidance indicates that concerns begin to arise where a business holds a market share of 35-40% or more. A monopoly/single textile PRO would, by definition, hold a 100% share of the textile EPR compliance market. The types of conduct specifically identified as potentially abusive under Chapter II include:

- **Imposing unfair purchase or selling prices or other unfair trading conditions:** A monopoly PRO setting fees without competitive benchmarking would face questions about whether those fees bear a reasonable relation to economic value

- **Limiting production, markets or technical development to the prejudice of consumers:** A monopoly PRO choosing preferred waste management contractors and excluding innovative new entrants could limit technical development in sorting and recycling technology

- **Applying dissimilar conditions to equivalent transactions:** Differential treatment of large producers versus SMEs, or of domestic versus international brands, could constitute discrimination

- **Making contracts subject to supplementary obligations unconnected to the contract’s purpose:** Requiring producers to accept bundled services or participate in schemes beyond core EPR compliance



[2]https://www.stichtingupvtextiel.nl/en/download/1262/?tmstv=1781537809

A nuance to the above is that if a monopoly is mandated by primary legislation rather than arising from commercial conduct, the Competition Act prohibitions might not directly apply. Therefore, government can create exempt legal monopolies. However, even legislated monopolies can face significant constraints under the UK's institutional frameworks.

- **CMA Market Investigations:** The CMA has broad powers to undertake market investigations in sectors where there is evidence of inadequate competition. These are among the CMA's strongest tools, powers that are virtually unique to the UK globally. If so, the CMA has extensive powers to remedy an adverse effect on competition by imposing behavioural conditions or forcing companies to sell part of their business. These very strong powers, introduced after the Second World War to break up wartime cartels, could theoretically be applied to any market showing signs of failure, including a monopoly EPR market (established legislatively or otherwise) where outcomes for producers and consumers were poor.

- **CMA Advisory Function:** The CMA's statutory functions include providing recommendations to government on promoting competition. Any proposal for a monopoly PRO would likely attract CMA scrutiny during the policy development process. The CMA could formally advise against a monopoly structure, and such advice would carry significant weight in parliamentary debate and judicial review proceedings.

- **Subsidy Control Act 2022:** The UK's post-Brexit subsidy control regime could be engaged if the government effectively grants exclusive rights to a single entity to operate the textile EPR scheme. If a monopoly PRO receives implicit financial advantages from its protected position, such as guaranteed revenue streams, exclusive data access, or protection from competitive entry, this could constitute a subsidy requiring assessment under the Act.
- **UK Internal Market Act 2020:** If a textile EPR scheme operates differently across the four UK nations, or if the designation of a single PRO creates barriers to market access for waste management and recycling operators seeking to serve the UK market, the Internal Market Act's market access principles could be engaged.

So even if established through legislation and technically exempt from Competition Act prohibitions, a monopoly textile PRO could face several practical competition-law-adjacent risks:

1. **Procurement challenges:** Waste management operators denied contracts by the single PRO could challenge procurement decisions under public procurement law or seek judicial review, particularly if the PRO is classified as a contracting authority

2. **Barrier to entry claims:** Potential new entrant PROs or innovative circular economy businesses could argue they are being unlawfully excluded from the market
3. **Fee disputes:** Producers dissatisfied with fees or service levels would have no alternative provider, and if the single PRO set fees perceived as unreasonable, this could trigger complaints to the CMA or legal action
4. **Cross-border distortions:** Producers operating across the UK and EU would face a monopoly in the UK versus competitive markets in countries like the Netherlands and Germany, potentially creating trade distortions and placing UK-based businesses at a comparative disadvantage
5. **Innovation suppression:** Without competitive pressure, a single PRO would have reduced incentive to invest in sorting technology, fibre-to-fibre recycling innovation, or novel collection methods - outcomes that would directly contradict the stated objectives of textile EPR

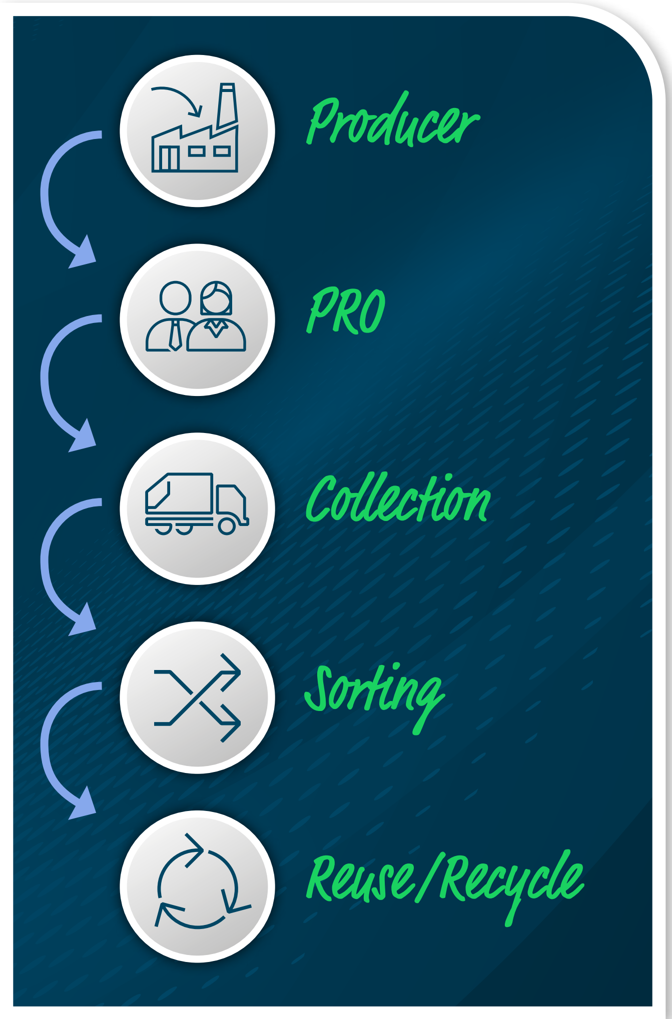
A UK Textiles EPR system

In the above we have reviewed evidence from other countries, research evidence and considerations potentially arising from UK competition law. Here we discuss the main arguments for and against competition and present our proposal for a UK textiles EPR system.

Arguments for Competition

The UK has a long history of competitive compliance schemes for packaging EPR (multiple schemes have operated since the 1990s), as well as WEEE and batteries.

The new pEPR system launched in 2025 maintains the role of compliance schemes, although it introduces a centralised Scheme Administrator (PackUK/Defra). This hybrid approach, central coordination with competitive compliance and choice, offers an alternative template for textiles EPR in the UK against the single, non-profit PRO in WRAP's Textiles Pact Blueprint.

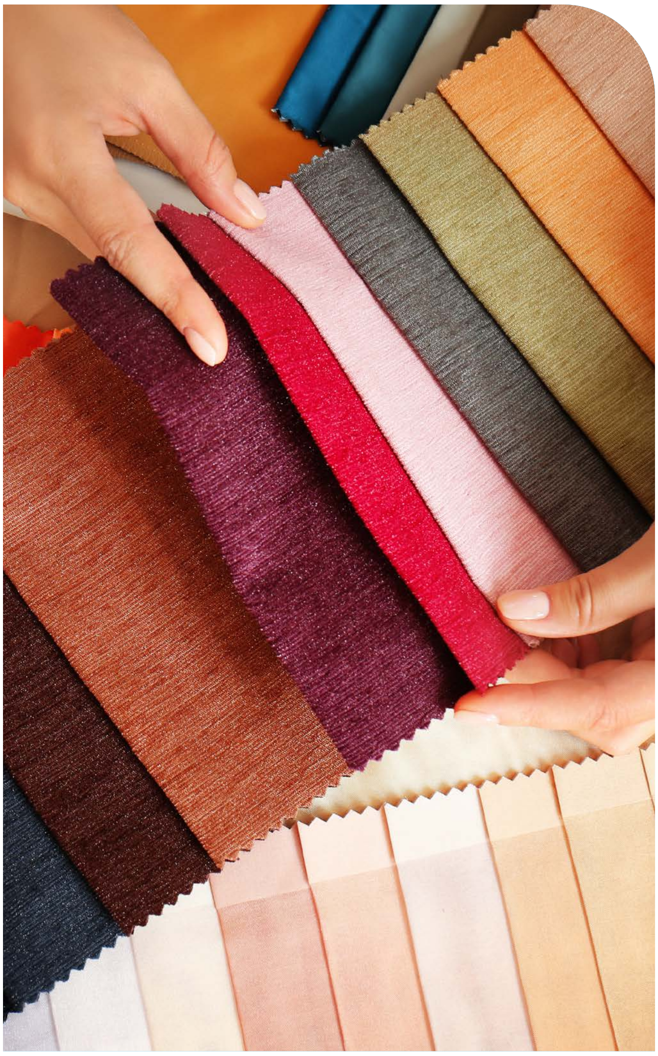


Our review of textiles EPR for the UK highlights the following key points:

1. **Cost efficiency:** The German and Austrian evidence (54% and 80% fee reductions respectively after introducing competition) directly addresses producer concerns about cost
2. **Innovation:** Competition incentivises PROs to innovate in collection methods, sorting technology, and circular business models. CCT in the Netherlands exemplifies how competition drives mission differentiation
3. **Accountability and transparency:** Multiple PROs create benchmarking opportunities. Stichting UPV Textiel's commissioning of an independent KPMG cost [2]study in the Netherlands demonstrates competitive pressure driving transparency
4. **Risk mitigation:** A monopoly PRO represents a single point of failure. The French experience. where government had to intervene with €58M aid and take back control of eco-modulation, illustrates how a single PRO can become complacent
5. **Consumer and producer choice:** Monopolies do not give producers choice and may have less price accountability
6. **Market maturity:** The UK already has a sophisticated existing textiles collection infrastructure (charity shops, textile banks, private collectors). A competitive model can better integrate and build on this diverse existing ecosystem rather than imposing a single system
7. **Alignment with UK competition policy:** A government-sanctioned monopoly PRO could face significant scrutiny under the Competition Act 1998, the CMA's market investigation powers, and the UK's broader pro-competition institutional framework

Advocates of monopoly approaches often raise several points seemingly as obstacles to competition, here we address the main counter-arguments to show how the system we envisage can overcome them.

1. **Economies of scale:** can be achieved operationally through a co-ordinating body/clearing house without requiring a single PRO or monopoly system
2. **Geographic coverage:** can be mandated through licensing conditions requiring all PROs to serve all areas
3. **Simpler compliance verification:** can be solved by establishing a central register (like Germany's ZSVR) without requiring a single PRO or monopoly system
4. **Avoids cherry picking:** can be solved by regulation with an allocation mechanism or universal service obligations
5. **Legislated monopolies:** technically possible under UK law but this ignores CMA's advisory role, market investigation powers, and the practical litigation risk from producers and excluded market participants



Based on the considerations in this paper, our proposal is for a competitive system for UK textiles EPR, facilitated by robust central coordination and regulatory oversight. This draws on the best elements of the UK Government's chosen approach to UK packaging EPR (central administrator with competing compliance schemes and producer choice), the textile EPR system in the Netherlands (competitive choice, mission differentiation), the German packaging EPR system (multiple PROs with central register), and avoids weaknesses identified in the French monopoly textile EPR (complacency, requirement for government intervention).

Details of our proposal for a competitive system for UK textiles EPR, are as follows:

- **Multiple licensed PROs** competing on service quality, innovation, fee levels, and mission
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Disclaimer

This document does not constitute legal advice and should not be relied upon as such. Care has been taken to ensure the accuracy of the information; however, it is important to acknowledge the possibility of discrepancies and the reality that many regulations are still in their draft stages and thus may be subject to significant changes.

Annex I: Textiles EPR schemes

France

Scheme: Textile, household linen and footwear EPR (Refashion)

France introduced the world's first textile EPR in 2007 (operational from 2008) covering clothing, household linen and footwear (the "CHF" categories). It was substantially strengthened by the 2020 AGEC anti-waste law, which added obligations such as a ban on the destruction of unsold textiles, mandatory consumer sorting information (the Triman logo), and a repair and reuse fund.

Status: In force since 2007/2008; expanded under the 2020 AGEC law

Scope: Clothing and workwear, household linen, and footwear placed on the French market

Timeline: Annual declaration to the PRO covering volumes placed on the market in the prior year

Costs: Weight/unit based eco-contributions, eco-modulated for durability, recycled content and recyclability; fees commonly range from a few cents to a few euros per item depending on category

Reporting: Annual declaration of quantities placed on the market via the Refashion extranet; eligible products must be declared for eco-modulation bonuses

System type: Competitive in principle (producers may set up an approved individual system) but in practice a single dominant PRO, Refashion (formerly Eco-TLC), covers around 95% of the market and has over 14,000 member entities

Sources: Refashion (official PRO), EU Textiles Ecosystem Platform – Refashion case study

Netherlands

Scheme: EPR for Textiles Decree (Stichting UPV Textiel)

The Dutch EPR for Textiles Decree took effect on 1 July 2023, with full waste management responsibility from 2025. It covers consumer clothing, work and corporate wear, and bed, table and household linen. The scheme sets some of the most explicit statutory reuse and recycling targets of any textile EPR.

Status: In force since 1 July 2023; collection and processing implementation began in 2025

Scope: Consumer clothing, work/corporate wear, and household linen (bed, table, kitchen linen)

Timeline: By 2025, 50% of textiles placed on the market (by weight) prepared for reuse or recycling, rising to 75% by 2030; sub-targets for domestic reuse and fibre-to-fibre recycling

Costs: For 2025, a preliminary management fee of around €0.20 per kilogram, with a €0.08 per kilogram offset for companies that participated in 2024 (an average of roughly €0.12 per kilogram for those firms)

Reporting: Annual declaration to Rijkswaterstaat before 1 August, stating volumes placed on the market and results achieved; foreign producers must appoint an authorised representative

System type: Individual responsibility that may be met collectively; Stichting UPV Textiel is the principal collective scheme, representing over 900 producers and importers

Sources: Stichting UPV Textiel (PRO), ILT (Dutch inspectorate)

Hungary

Scheme: Textile waste under the national EPR framework (MOHU)

Hungary brought textiles into its unified national EPR framework from 1 July 2023, alongside packaging, electronics, batteries and other streams. The system is unusual in being run as a 35 year state concession granted to a single operator, MOHU. Government Decree 80/2023 sets the cross-stream rules and Decree 275/2023 covers textile waste management specifically.

Status: In force since 1 July 2023

Scope: Clothing, footwear, household linen and accessories (Decree 80/2023, Annex 1, point 1.10), plus related sales packaging

Timeline: None

Costs: Weight based EPR fee ("EPR-díj") set by ministerial decree; the legacy environmental product fee remains but is largely offset against the EPR fee

Reporting: Quarterly declarations via the OKIR/OKIRKAPU system by the 20th of the month after each quarter; MOHU then invoices, payable within 15 days; registration required with both MOHU and the National Waste Management Authority. Since April 2025 late filing or payment can attract administrative fines

System type: Concession monopoly: a single state appointed operator, MOHU MOL Hulladékgazdálkodási Zrt.

Sources: vatcompliance.co – Hungary EPR guide, Marosa – Hungary EPR obligation from 1 July 2023

Latvia

Scheme: Textile EPR via the Natural Resources Tax

Latvia operates a tax based textile EPR from 1 July 2024 (building on amendments first introduced in 2022/2023). Producers placing textiles on the market pay a Natural Resources Tax, which they can avoid by joining an approved PRO that takes on the collection and recycling obligations. Most brands choose the PRO route because the participation fee is far lower than the headline tax.

Status: In force since 1 July 2024

Scope: Clothing, household linen, footwear and accessories placed on the Latvian market

Timeline: None

Costs: Natural Resources Tax of €0.50 per kilogram if not in a scheme; joining a PRO reduces the effective cost substantially (reported administrative uplift of around €0.13 per kilogram via the main PRO)

Reporting: Registration and reporting through the national TULPE information system

System type: Dual compliance: pay the state tax directly, or join an approved PRO. The main PRO is Latvijas Zaļais punkts (Latvian Green Dot, LZP)

Source: Latvian State Environmental Service (official), OECD – EPR in the garments sector

Australia

Scheme: Seamless – National Clothing Product Stewardship Scheme

Australia's Seamless scheme commenced on 1 July 2024. It is a voluntary, industry led product stewardship scheme rather than a mandatory EPR, but it is widely treated as the regional equivalent. The federal government has stated it will regulate if voluntary uptake is insufficient. The scheme is administered by Clothing Stewardship Australia, developed with the Australian Fashion Council and partners.

Status: Operational (voluntary) since 1 July 2024; regulation threatened if uptake is inadequate

Scope: Clothing placed on the Australian market by member brands

Timeline: Make Australian clothing circular by 2030; interim aim of 60% industry sign-up to divert around 120,000 tonnes from landfill by 2027

Costs: A levy of 4 cents per garment paid by member brands ("stewards")

Reporting: Registration via Seamless

System type: Voluntary single scheme operator (Clothing Stewardship Australia); membership is opt-in

Sources: Seamless Australia (official), Australian Fashion Council – Seamless

California (USA)

Scheme: Responsible Textile Recovery Act of 2024 (SB 707)

California enacted SB 707 in September 2024, the first textile EPR law in the United States. It requires apparel and textile producers to form and join a PRO that will run a statewide collection, repair, reuse and recycling programme. CalRecycle selected Landbell USA as the scheme PRO on 27 February 2026. Fees and full operation remain some years away, as implementing regulations cannot take effect before July 2028.

Status: Enacted September 2024; PRO (Landbell USA) selected February 2026; regulations not effective before July 2028

Scope: Apparel and textile articles, including footwear, swimwear, undergarments and handbags; second-hand sellers and producers under US$1m global turnover are exempt

Timeline: PRO applications to CalRecycle by 1 January 2026; producers must join an approved PRO by 1 July 2026; participation in the stewardship plan by 1 July 2030 or on plan approval, whichever is sooner

Costs: Eco-modulated producer fees based on environmental performance; levels not yet set. Penalties up to US$50,000 per day for willful violations

Reporting: no details

System type: Competitive PRO model administered by CalRecycle; Landbell USA selected as operator

Sources: California Legislature – SB 707 bill text, Anthesis – SB 707 explained (PRO selection)

The following countries are drafting or consulting on textile EPR but do not yet have live operational systems. EU member states have a hard backstop to implement EPR by April 2028 as required by the revised Waste Framework Directive.

Spain

Spain published a draft textile EPR decree in June 2025 to implement the EU requirements, with final adoption expected in 2026 and a three month registration window for producers thereafter. The draft covers any company first placing textiles or footwear on the Spanish market, including distance sellers. Fees would be weight based and consider recycled content, recyclability and fast fashion practices, and must be shown separately on invoices.

Source: ecosistant – EU textile EPR / Spain

Italy

Italy's Ministry of the Environment and Energy Security published a draft textile EPR decree for public consultation in April–May 2025. The final decree has not been adopted, and no confirmed start date exists, though entry into force has been anticipated in 2026. The proposed scope is broad, covering clothing, footwear, accessories, leather goods, home textiles and mattresses. Separate textile collection has been mandatory in Italy since January 2022.

Source: Carbonfact – textile EPR overview (Italy)

Germany

In March 2026 the German Federal Ministry for the Environment published a position paper on textile EPR, with the stated goal of transposing EU Directive 2025/1892 into national textile legislation. The scheme is at the policy design stage.

Source: ecosistant – EU textile EPR / Germany

Switzerland

Fabric Loop is a voluntary non-profit industry organization set up to prepare textiles EPR in Switzerland. A detailed business case has been developed with implementation expected from 2027. Fabric Loop intends to co-ordinate a network of collection and recycling partners and manage the financing, traceability, and infrastructure development funded by an advance recycling contribution (VKB).

Source: https://www.fabric-loop.ch/loesung

Sweden

Sweden has been moving towards textile EPR for several years and is introducing it in phases. Draft legislation would require producers to finance and organise collection and processing of textile waste, including clothing, household textiles, bags and accessories.

Final timing is being aligned with the EU directive's deadlines.

Source: H2 Compliance – EU textile EPR member state update

Denmark

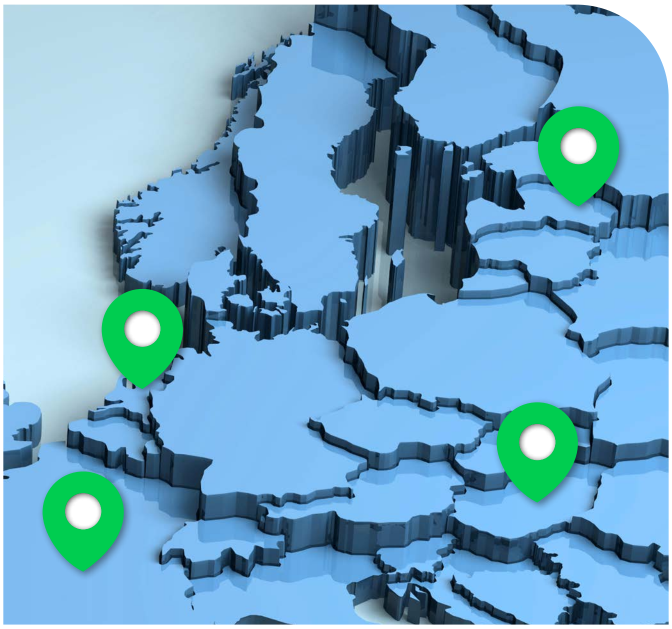
Denmark expects to adopt textile EPR legislation no later than 17 June 2027, with the scheme entering into force no later than April 2028, in line with the EU directive. Collective schemes (for example ERP/Landbell) are already offering pre-registration. Denmark only brought its packaging EPR into force on 1 October 2025, so textiles follow a similar staged path.

Source: ERP Denmark – producer responsibility for textiles

Ireland

Ireland has been scoping the design of a national textile EPR, focused on three principles: building on existing EPR systems to reduce administrative burden, prioritising prevention and reuse over recycling, and recognising the role of the existing used textiles sector. No scheme is yet in force.

Source: ERP UK – introducing EPR for textiles



Sources

1. Refashion (France, official PRO) – https://pro.refashion.fr/en/what-epr

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