
Resortecs,
Recycling made
Easy.



Resortecs' position paper

Waste Framework Directive Revision

Our views

Resortecs calls on the EU institutions to build a holistic and enabling policy framework that promotes circular textiles, design-for-disassembly and the scaling-up of circular innovations, the importance of which is stressed in the Transition Pathway for the Textiles Ecosystem ('For the twin transition to be successful and to lead to increased resilience and competitiveness for the EU textiles ecosystem, legislation plays a fundamental enabling role. Mandatory requirements can help industry players to move towards circular and sustainable solutions and at the same time improve the level playing field in the single market.')

1. Waste Framework Directive

The Waste Framework Directive revision is a vital opportunity to modernise waste management in the textiles industry and to make circularity the norm. Resortecs supports the European Commission's proposals to introduce separate collection for textiles through mandatory and harmonised Extended Producer Responsibility rules for textiles with eco-modulated fees to incentivise producers to

ecodesign their products. Resortecs calls for EU harmonisation of eco-modulation and for the criteria to include design for disassembly.

So-called 'pre-recycling' techniques are vital to deliver the waste hierarchy principles in practice. For example, sorters play an essential role in determining the treatment operation a textile product undergoes at its end of life. Resortecs welcomes the European Commission's proposal to clarify the requirements of sorters (art. 22d, § 4 and 5). Similarly, disassembling a textile product can determine if a product will be recycled, or end in incineration or landfill. The Waste Framework Directive revision should, therefore, provide recognition to such pre-recycling techniques, including disassembly, and support their industrial scale-up and mainstreaming.

Resortecs supports calls to introduce 2030 targets for textiles-to-textiles recycling as well as a fibre-to-fibre sub-target for when the former is no longer an option so as to avoid premature downcycling. These targets should increase over time on the basis of a feasibility study.

Resortecs welcomes measures to tighten the export to third countries of textiles waste streams as often these are falsely labelled as second-hand goods for reuse and in this way escape the waste regime. Consequently, this waste ends in incineration or landfill, representing a loss of materials to the EU economy.

- Resortecs supports the European Parliament's proposals in the ENVI draft report, notably to:
- Define 'unsold textiles products' (amendment 18) and 'destruction of textile products' (amendment 19).
- Eliminate illegal landfills and illegal dumping in the EU (amendments 3, 7, 46) as well to introduce textile waste reduction targets (amendment 115).
- to support innovation in waste prevention and waste management (amendments 9, 128) and to allocate a percentage of Extended Producer Responsibility fees to a fund for reuse and repair (amendment 60).

As set out in the Textiles Ecosystem Transition Pathway, investments are urgently needed to scale-up textiles recycling capacity, including design for disassembly and active disassembly, to increase material efficiency, prolong materials' lifecycles, and unlock industrial scale textiles-to-textiles and fibre-to-fibre recycling.

2. Ecodesign for Sustainable Products Regulation (ESPR) & delegated act on textile products

Today, textiles are designed for waste, rather than textiles eco-designed for circularity being the norm.

Resortecs strongly supports the introduction of the Ecodesign for Sustainable Products Regulation to swiftly make sustainable textiles products the norm in Europe. Resortecs urges the European Commission to confirm textiles as a priority product group for the setting of ecodesign criteria in the the first Ecodesign Work Programme 2024-2027 under this Regulation.

The delegated act setting ecodesign criteria for textiles should notably (1) recognise and include design for disassembly as an eco-design criterion, and (2) set ambitious mandatory minimum recycled content targets. In doing so, the EU institutions can deliver on action 2 of the Textiles Ecosystem Transition Pathway, namely, to recognise and value specific sustainability practices undertaken by the industry, which would include design for disassembly and active disassembly.

Resortecs also supports the EU institutions' intention to prohibit the destruction of unsold textiles products as well as to introduce Green Public Procurement criteria, including design for disassembly, for textiles products and services, particularly for work wear (representing 14% of EU GDP; ca. EUR 2 trillion per year).

3. Textiles Labelling Regulation

Resortecs welcomes the European Commission's initiative to revise the Textiles Labelling Regulation and calls for the revision to integrate information, labelling and disclosure requirements on design for disassembly, repair, upcycling, and recycling as key circularity parameters, in alignment with the Ecodesign for Sustainable Products Regulation (ESPR) delegated act on textiles and for the EU digital product passport (DPP).

A textile product's physical label should contain simple, harmonised, and comparable visual symbols reflecting its key circularity characteristics. A textile product's design for disassembly should be included to guarantee adequate sorting, processing, and waste prevention, as well the product's recycled and recyclable content. Information should also appear in a textiles product's Digital Product Passport to provide the detailed information substantiating the physical label.

Resortecs also supports the revision granting recognition to innovative, new fibres to spur circular innovation.

The revision is also an opportunity to boost the sector's circularity by building a standardised information infrastructure that encompasses cradle-to-cradle, expanding from today's cradle-to-gate/grave information infrastructure. Making this information available is essential to enable value-retention operations such as disassembly and, thereby, reuse, repair, upcycling and high-quality recycling.

Doing so also gives recognition to circular products, components and materials that enable ecodesign, such as Resortecs innovative threads for textiles. An eco-designed product will only fulfil its circularity potential if the information needed – including how it can be efficiently disassembled – is readily available and accessible to the right actor.

Such a standardised information infrastructure is not available today, meaning that consumers, sorters, recyclers, and manufacturers lack crucial information. This information should also appear in a textiles product's DPP and provide the detailed information substantiating the physical label.

About Resortecs

Resortecs is a design-for-disassembly textile startup. We enable circularity in fashion and beyond with two active disassembly innovations: heat-dissolvable stitching threads and thermal disassembly systems that simplify textile disassembly and recycling. Our patented thermal solution is five times faster than conventional disassembly and allows the recycling of up to 90% of clothing's fabric.

