

20 March 2017

For the kind attention of the European Commission Heads of Unit of DG Internal Market, Industry, Entrepreneurship and SMEs and DG Environment GROW-ENV-REACH-RESTR@ec.europa.eu Copy to: ENV-CARACAL@ec.europa.eu and GROW-CARACAL@ec.europa.eu

Dear Mr. Berend and Mr. Hansen,

Textile Recycling in the context of Restriction of CMRs 1a and 1b in textiles and clothing

BIR has the Transparency Register Identification number: 153973318978-42. BIR was founded in 1948 and was the first federation to support the interests of the recycling industry on an international scale. BIR is structured according to the following commodity divisions: Non-Ferrous Metals; Ferrous Metals; Paper; and Textiles. Hence our interest in the “Direct Reuse of textiles”, the “Preparation for Reuse of textiles” and the “Recycling of textiles”.

We thank you for your invitation to the Technical Workshop on Restriction of CMRs 1a and 1b in textiles and clothing 7 February 2017. As a follow-up to those discussions, whilst BIR supports that manufacturers should not place clothing on the market with CMRs above safe thresholds so that both human health and the environment are protected, BIR wishes to elaborate on its request for certain reuse and recycling exemptions from the upcoming restrictions.

We hope the benefits of reuse and recycling are well understood: as people buy re-useable clothing, manufacture of new clothing with its associated material, water and energy consumption and use of dyes is offset; whilst producing new products from recycled fibres causes far less environmental impact than by using virgin fibres; both reuse and fibre recycling reduce pressures on final disposal by incineration or in landfill.

Clothing that has been donated for direct reuse, or that requires repair in preparation for reuse should be exempt particularly as those goods and wastes are heterogeneous as collected, in contrast to homogeneous manufactured textile goods. The chemical makeup of used clothing will differ from the factory product considering their first lifetime use and wash cycles. Assertions are that chemicals of concern will have been washed out over the first life-cycle and so are not present at or above threshold levels. Greenpeace tests found chemicals from manufacturing were washed out in the first washes. [[Greenpeace report link](#)]. Besides the unfeasibility of chemical testing all those diverse used textile articles, it would be socially, economically and environmentally disproportionate to restrict direct reuse and preparation for reuse of second-hand clothing and textiles.

Unwearable textiles and other textiles that cannot be reused are sold to the 'flocking' industry for shredding or pulling into fibres, followed by carding, after which the yarn is re-spun ready for later weaving, knitting or felting. Textiles may otherwise be cut into wiping cloths. Such mechanical recycling of used textiles should also be exempt for the same reasons as for direct reuse and preparation for reuse of clothing and textile articles. BIR members add that many of the applications to which mechanically recycled textiles are sent do not usually end up being in close contact with skin. e.g. heat & sound insulation, mattress and duvet fillings.

The discussions last month were not conclusive on agreeing exemptions for chemical recycling which will grow in importance with increased demand for such technologies and increased R&D funding. The meeting expressed the concern that CMRs may be recycled

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during chemical recycling. The technical feasibility and economic viability of testing samples for restricted CMRs during the chemical recycling of textiles should be considered along with the proportionality of sampling and testing if threshold limits are very rarely if ever exceeded. However, based on the same reasoning accepted to exempt from the foreseen measures used clothing for direct reuse, used and waste clothing for preparation for reuse, and the mechanical recycling of fibres from used and waste clothing, that same clothing that is chemically recycled would be unlikely to exceed threshold limits and should be exempted as well.

BIR remains concerned that unjustified and so unnecessary restrictions on mechanical and chemical recycling of used and end-of life textiles articles would threaten Member State Research and Development initiatives to prevent and minimise textile waste and other activities with respect to “Direct Reuse of textiles”, the “Preparation for Reuse of textiles” and the “Recycling of textiles”.

We thank you for taking these points into consideration and would appreciate this correspondence be added to that on the website and made available for CARACAL discussions.

Yours sincerely,

A handwritten signature in black ink that reads "Ross Bartley". The signature is written in a cursive, slightly slanted style.

Ross Bartley
Trade & Environment Director