THREADS OF TRUTH

VOICE

GLOBAL SHAPERS COMMUNITY

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Threads of Truth

A collaborative research between VOICE Ireland & Global Shapers Dublin
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Executive summary

How many of us have have discarded our unwanted clothing to banks/shops and wondered where it goes? Are we helping or are we hindering? And why is the world of textile recycling so murky in Ireland? Well, VOICE is on a mission to make it more transparent, so you know where your unwanted clothing is going. But the first step is to find out what the companies are not telling us. Where is our unwanted clothing going?

This investigation dives into the fate of Irish post-consumer textiles. 23 Items were deposited in clothing banks and take-back schemes, revealed the end destination of Irish clothing disposed of through clothing banks and take back schemes. Over ten months, tracking devices were embedded in various garments to follow their journeys after being discarded. Of the items tracked, only a 6 were confidently verified as reused, with most either exported outside the EU or lost to ambiguous, untraceable fates.

The investigation highlights major concerns:

95% **of discarded clothes left the Republic of Ireland.** Showing that our national reuse system is completely overflowing and our incapacity to deal with unwanted clothes nationally.

60% **of clothes were exported outside the EU**, making it harder and harder to trace the stakeholders involved and identify the fate of these clothes. Many are shipped to countries in Africa or Asia, where waste management isn't able to cope with the amount of clothes that are not being sold leading to uncontrolled dumping and burning creating social and environmental harm.

Although 22 out of 23 items were in reusable condition, only

26% **were confirmed to have been reused** by our team.
Reusability is determined by composition: >80% of reused items (5 out of 6) were quality items made of natural fibres (98,99 or 100% cotton).

13% were confirmed as having been **dumped or incinerated**.

56% **of items fell under the "unclear"** category due to a lack of follow-up and opaque practices. These garments often languish in overseas warehouses, making their final fate impossible to confirm.

This investigation exposes deep cracks in the existing system and an urgent need for transparency. While Irish consumers tend to think of all their discarded clothes as donations that will enable reuse or recycling, the lack of harmonized rules and enforceable transparency makes it likely that much of what is collected merely perpetuates environmental injustice elsewhere. With recent changes, local councils are now paying for third party companies to deal with textile waste. This lack of transparency is unacceptable. With tax payers money involved, the system is in urgent need of reform, and accountability needs to be attributed across the board. This report sets out a road map that includes all stakeholders in the systemic change we need.

Government

The government needs to take strong actions to ensure transparency and traceability are accounted for by any companies dealing with collected Irish textile. Rules need to be enacted and enforced regarding the collection, sorting and export of any Irish used textile and textile waste. Companies must provide proof of what they claim and the information needs to be accessible to all. New tools such as the EPR must be designed with prevention and reuse in mind first, tackling quantity as well as quality.

Key actions

- Mandatory public reporting of volumes collected, sorted and exported, including declared purpose (reuse, recycling, disposal).
- Green public procurement: introduce tendering conditions on traceability for any operator handling Irish textiles.
- Export rules preventing the shipment of low-value textiles labelled as “reusable.” and enforce follow-up on end fate.
- EPR scheme designed around prevention first, with eco-modulation fees that reward durability, mono-material design and effective reuse or recycling and tackles overproduction by indexing fees to volumes.

Businesses (producers, retailers et collectors)

Brands must take responsibility for their central role in creating the textile waste crisis. Overproduction and the dominance of synthetics drive down quality and shorten product lifespans. Circularity is impossible without less production and better design.

Key actions

- Publicly disclose post-collection volumes, pathways and outcomes as well as quantity put on the market for retailers.
- Enforce a code of conduct with companies you deal with in the collection and treatment of used clothing. (see page 36).
- Design for circularity: quality items meant to last, be reused, worth repairing and recyclable (using existing technologies).
- Invest in local reuse and recycling capacity building, by partnering with social enterprises.

Consumers

Ireland's very high consumption rate puts pressure on a system that cannot cope with the volume of clothes produced and discarded. Most of us want to do the right thing and avoid waste here and abroad. However, we sometimes fail to identify how one action can be linked to unsustainable practices, especially when that link is hidden. This investigation and conclusions from this report aim to shed light on the issues that led to the current textile waste crisis, and how we should all take part in the change.

Key actions

- Choosing better-quality, well-made clothes, especially those with good composition (mono-material or high natural fibre content). This dramatically increases their reuse potential. Our own tracking project proved this: the items that were reused almost all had high-quality composition. Quality extends lifespan, supports local resale, and prevents items from becoming waste abroad.
- Choose second-hand first, or invest in fewer, high-quality new items.
- Extend clothing lifespans through repair, swapping, repurposing and community reuse.
- Understand that take-back and donation systems are not waste bins. Learn about the environmental and social impact of textile in order to make better choices.

  Individual targets can be set, aligned with sustainable fashion journeys. You can learn and start implementing change by visiting fabricofchange.ie

  - Decrease individual clothing purchases
  - Increase the number of wears per garment.
  - Participate in community reuse (swaps, repair cafés, sharing initiatives).

Without clear and enforceable standards for collection, export, and reporting, Ireland's post-consumer textile flows will continue to disappear into a global black hole, undermining faith of well-meaning consumers and fuelling the negative consequences of overproduction and fast fashion.

Summary table of items

Clothing Item	AirTag Num	Photo	Condition	Materials	Drop Off at	Final Destination	Distance Travelled	Assumption
Black Jacket	1		New	Shell-100% Nylon; Lining-100% Polyester; Min 50% Padding from Recycled Materials	Penneys store	Sokolow, Poland	1 819 km	UNCLEAR stored Indefinitely at Yellow Octopus facility
Bordeaux Sweater	2		New	35% Cotton, 65% Polyester, Min 50% Padding from Recycled Materials	Penneys store	Irbid Jordan (on the road)	6 044 km	UNCLEAR with high chances of being sent to a landfill
Blue Mud Jeans	3		Used	60% Organic Cotton, 25% Recycled Cotton, 5% Other	Cork Clothes Pods	Newry, Northern Ireland	359 km	UNCLEAR stuck in a warehouse
Grey Turtleneck	4		Used	56% Nylon, 44% Acrylic	Waterford - Clothes Pods	Faisalabad-Jaranwala Road, Pakistan	5 563 km	DOWNCYCLED
Blue Slit Denim Skirt	6		Used	98% Cotton, 2% Elastane	Penneys store	Irbid Jordan (on the road)	6 044 km	UNCLEAR with high chances of being sent to a landfill
Khaki Joggers	7		New	65% Polyester, 35% Cotton	Penneys store	Tripoli, Libya	4 571 km	UNCLEAR stored or dumped
Black Turtleneck	8		Used	60% Wool, 30% Cotton	Clothespod	Karachi, Pakistan	21 225 km	DUMPED

Summary table of items (cont.)

Clothing Item	AirTag Num	Photo	Condition	Materials	Drop Off at	Final Destination	Distance Travelled	Assumption
Black Joggers	10		Used	52% Polyester, 48% Cotton	H&M	Hunxe, Germany	3 857 km	INCINERATED energy recover
Coffee Yarn Sweater	13		New	57% Polyester, 34% Acrylic, 9% Polyamide	M&S	Waterford, Ireland	496 km	REUSED (in a local store)
Grey Black Striped Turtleneck	17		New	52% Polyester, 40% Acrylic, 5% Lesh, 3% Elastane	Penneys store (Waterford)	Mragowo, Poland	3 774 km	UNCLEAR with potential reuse within local sports club
Tie&Dye Hoodie	20		Used	80% Cotton, 20% Polyester	Cork - Clothes pods	Nairobi, Kenya	7 657 km	UNCLEAR seems to be in a warehouse
White Wide Jeans	21		New	99% Cotton, 1% Elastane	H&M	Amman, Jordan	4 516 km	REUSED
Black Striped Trousers	23		Used	Not Available	Penneys store	Irbid Jordan (on the road)	6 044 km	UNCLEAR with high chances of being sent to a landfill
Black T-Shirt Dress	24		Used	100% Cotton	M&S	Belfast, Northern Ireland	140 km	UNCLEAR stuck in a warehouse in NI
Grey Men's Jeans	25		Used	98% Cotton, 2% Elastane	H&M	Swidnica, Poland	1 629 km	REUSED

Summary table of items (cont.)

Clothing Item	AirTag Num	Photo	Condition	Materials	Drop Off at	Final Destination	Distance Travelled	Assumption
White Men's Jeans	26		Visibly damaged	Shell - 99% Cotton, 1% Elastane; Lining - 70% Polyester, 30% Cotton	Waterford - Clothes Pods	Lome, Togo	5 669 km	dumped
Red Sweater Old	29	N/A	Used		Penneys store	Irbid Jordan (on the road)	6 044 km	UNCLEAR with high chances of being sent to a landfill
Blue and Red Striped Shirt	32		Used	100% Cotton	Clothespod Ranalagh	Gniezno, Poland	1 593 km	Reused
Blue Striped Shirt	34		Used	100% Cotton	Clothes Pod SandyMount	Lagos, Nigeria	5 828 km	UNCLEAR close to residential area but also to what seems to be wild dumping site.
Blue Shirt	35		Used	100% Cotton	Clothes Pod SandyMount	Nairobi, Kenya	7 325 km	Reused
Grey Shirt	36		Used	70% Cotton 30% Linen	H&M	Polch, Germany	1 223 km	UNCLEAR stored indefinitely or shredded on site
Purple Shirt	37		Used	Maximised 2 ply cotton	Clothes Pod Trinity	Sharjah, United Arab Emirates	5 909 km	UNCLEAR stuck in a warehouse
Light Blue Shirt	38		Used	100% Silk Touch Giza 87 (Egyptian Extra-Long Staple cotton)	Clothes Pod Trinity	Adjamé, Côte d'Ivoire	11 909 km	Reused (in a local store)

Introduction

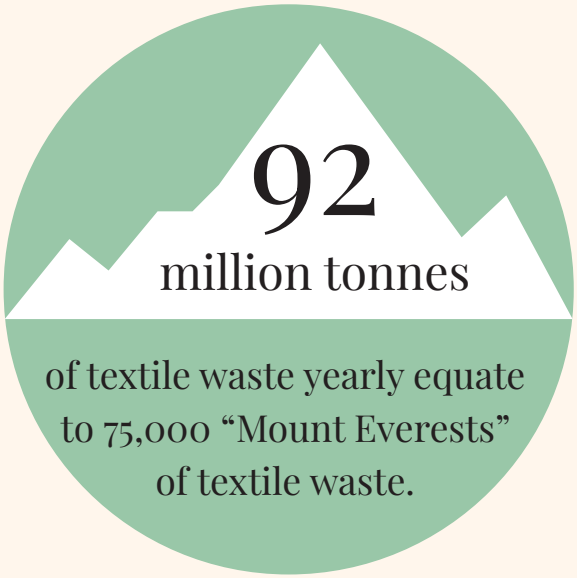
Introduction

The global textile crisis.

This investigation takes place as the global textile waste crisis reaches an all time high. Fast fashion, and now ultra-fast fashion driven by online platforms, have normalised overproduction and overconsumption on a massive scale. Clothes are made faster, sold cheaper, and discarded sooner than ever before[1].

The impacts of the fashion industry are now well-documented and reveal a dreadful reality: fashion is responsible for around **10% of global greenhouse gas emissions**[2], and is a direct contributor to plastic polluting our oceans (at least 10% but most likely more according to studies)[3] while continuing to be linked to human rights abuses across the world (with the most recent scandal unveiled just last month by RTÉ investigates).

Yet we still tend to overlook one crucial part of this industry: what happens to our clothes after we're done with them.



> What used to be seen as durable goods are now treated as disposable items. This throwaway culture shapes how we buy, wear, and get rid of our clothes.
>
> Solene Schirrer

[1] A new textiles economy: Redesigning fashion's future, Ellen MacArthur Foundation, 2017

[2] Niinimäki, K., Peters, G., Dahlbo, H., Perry, P., Rissanen, T., & Gwilt, A. (2020). The environmental price of fast fashion. *Nature Reviews Earth & Environment*, *1*(4), 189-200. https://doi.org/10.1038/s43017-020-0039-9

[3] Boucher, J. & Friot, D. (2017). *Primary Microplastics in the Oceans: A Global Evaluation of Sources*. IUCN.

What happens at the end of a garment's life.

Every year, 92 million tonnes of textile waste[4] are discarded globally: a never-ending flow following the take–make–waste pattern (SOURCE). Using a more visual representation of this literal mountain of waste: it would equate to 75,000 "Mount Everests" of textile waste **every single year**.

This unprecedented amount of used clothes has nowhere to go. In fact, if we try to find out what happens to these clothes, the system gets opaque very quickly.

For starters, the majority of discarded clothes aren't even collected for sorting, they simply go to general waste and are either burned or landfilled. On the other hand, It is practically impossible to know what happens to the ones that are collected.

This is precisely the starting point of this investigation, carried out over 10 months to find out what happened to clothes that were discarded and collected in Ireland by private operators.

Why investigate?

Because too often, we think disposing of clothes, even in good condition, is as easy as putting them in a box or in a bin. We wanted to explore the journeys and fates of these items. The goal of this investigation is dual: (1) to raise awareness and (2) to start asking questions about our collective responsibilities in the management of our used textiles and textile waste[5]. The systemic lack of transparency or any kind of harmonised rules across the supply chain needs to be challenged. We wish to address social and environmental justice and push for fair and transparent solutions.

[4] Niinimaki et al. ibid (no. 2)
[5] Schirrer, Solene.. (2023). *Threads of Transparency*. VOICE Ireland. 2023.

End of life: A poorly understood and underregulated stage of clothes lifecycle

As a whole, the fashion industry is poorly regulated despite its many negative impacts or even compared to other industries. However, the end-of-life stage of clothing in particular has been most neglected as an important contributor to the product's impact. In recent years, attention has rightly focused on the harm of textile production and manufacturing: exploitative labour conditions, environmental and health impacts have been raised in the public debate. In this regard, although remaining limited, progress has occurred[6]. New regulations are under way and new businesses are already challenging the current model by integrating circularity and transparency at their core. For example, building on new regulations and innovative businesses, Irish Manufacturing Research through its CIRCULÉIRE initiative has supported over 26 start-ups and deployed €1.5 million in grants to pilot circular innovations, demonstrating significant national momentum in scaling circular textile and industrial solutions.

However, the end of life of clothing has not received the same attention, The story remains largely untold and opaque. Shocking images of beaches in Ghana or "clothing deserts" in Chile have reached the public eye, but they have not yet been matched with concrete political action or clear solutions[7].

Credit: Michael Takyi Lartey / Unearthed: Greenpeace UK

[6] Brennan, G. (2025, October 7). Delivering the circular transition. Environment Ireland. https://www.environmentireland.ie/delivering-the-circular-transition/

[7] Ibid.

There are several reasons for this neglect.

- First, it's important to recognise that textiles and clothing form a singular waste stream. Clothing is a high-value item that can, in theory, be reused quite easily, which makes it a prime candidate for circularity. This is also why there has been such difficulty in deciding when to actually call it waste. Yet, in the current system, more and more waste is entering what used to be a value-driven trade, and **the system is collapsing** under the weight of low-quality items.
- The trade of used clothing is not well understood, either by the public or by policymakers. The supply chain is complex, with blurred boundaries between charities that genuinely seek to promote reuse locally, and businesses involved in a global trade. The activities and responsibilities of collectors, sorters, recyclers are not well-communicated, adding to the confusion.
- The power balance and historical dynamics between countries is another complexity. The trade of used clothing is, to some extent, necessary for many Western countries. If every European country, including Ireland, had to manage its own discarded textiles, we would be overwhelmed with waste we currently have no capacity to reuse or treat. On the other hand, receiving countries have shaped their local markets around the trade of second-hand clothing, creating genuine reuse and recycling opportunities and supporting livelihoods[8]. However, the growing trend of offloading low-quality or unsellable clothing onto them has disrupted this sector and left them with a waste crisis they have no way of dealing with. [9]

> The line between international reuse and waste dumping has become pretty thin.
>
> Solene Schirrer

These intricate elements forming the global market of used textiles should not be an excuse for inaction. On the contrary, they underline the urgent need for systemic change. If policymakers continue to avoid regulating the end-of-life of textiles, environmental and social costs will continue to be exported elsewhere, while the root causes (overproduction and lack of accountability) will remain unaffected.

We need a coordinated approach that recognises both the **value of genuine reuse** and **the risks of waste colonialism**. Producers need to be held responsible for the full life cycle of the clothes they put on the market, and consumers realise that the impact of their discarded clothes goes beyond simply "recycling".

[8] (*Trade In Secondhand Clothes : The Benefits Outweigh The Costs | D+C - Development + Cooperation*, 2022)

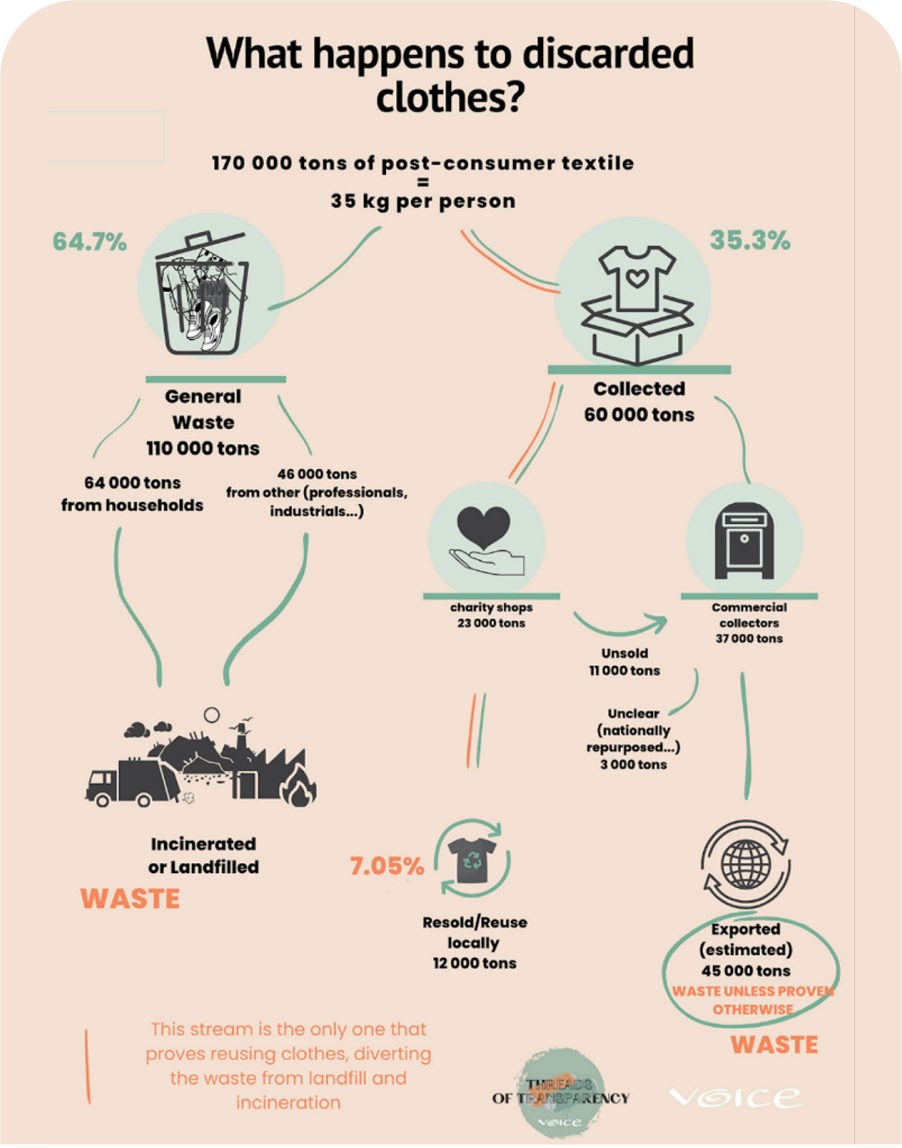
[9] Or Foundation, Ricketts, L., & Skinner, B. (2023). *STOP WASTE COLONIALISM*. https://stopwastecolonialism.org/pdf/stopwastecolonialism.pdf

The state of Irish post-consumer textile waste

In 2023, VOICE Ireland highlighted the lack of awareness and transparency surrounding the collection and export of Irish clothing in its Threads of Transparency report[10]. Using existing literature on the topic, we called for more transparency and traceability from collectors and regulators.

In Ireland today, most of the clothes we no longer want do not end up being reused or recycled, they are simply thrown away. The EPA's NATEX study[11] found that of the 170,000 tonnes of post-consumer textiles discarded every year (about 35 kg per person), the largest share goes directly into the black bin, alongside household waste. Once in the black bin, textiles are either sent for incineration or landfill, meaning their value is lost completely.

Figure 1: What happens to discarded clothes?



Source: Threads of Transparency report VOICE Ireland, 2023

[10] Schirrer, Solene.. (2023). *Threads of Transparency*. VOICE Ireland. 2023.
[11] Environmental Protection Agency (2021). *Nature and Extent of Post-Consumer Textiles in Ireland — Study Report*.

Currently, only 35% of Irish post consumer textile is being collected.

What is the collecting landscape like?

Charity shops

Charity shops accept donations at their shops directly (although some operate some textile banks as well). They are the only genuine reuse actors in the country and form a great network of communities, provide employment and promote a circular model. They resell most of the items they collect. The unsuitable is either passed onto commercial textile operators or downcycled.

Mainstream retailers

In recent years, some mainstream retailers have introduced take-back schemes, where customers can drop clothes back to stores. Though these remain limited in scale they are part of a wider development of producers' responsibility for the waste they produce and will most likely be deployed at greater scale in coming years.

Bring banks

Finally, bring banks, often located in car parks or at recycling points, are the most common option for unwanted clothes. Run by private contractors, these bins collect large volumes of clothing, but the suitability of these items for resale is evaluated loosely, with no external oversight on the methodology used and no accountability for categorisation results. That virtually means that these companies can decide to label these clothes however they like and sell them abroad as such. That is where we find different types of collectors with variations in the level of transparency.

Only collectors
They gather textiles from banks and export them directly without sorting under one label: used clothing. Someone else will have to do the sorting and deal with non- wearables.

Collector-sorters
Doing a quick separation by season or quality before shipping.

Collector-sorter-graders
Handle clothes with more care, grading them into detailed categories (sometimes over 200) for reuse or recycling. These operators are generally seen as the most trustworthy. Still, once the clothes leave the country, transparency drops sharply. What happens next is often unclear.

The variety of actors creates different standards when it comes to the sorting and export of clothing, but also on the transparency surrounding the whole sector.

At the heart of the system: the transparency gap.

At the heart of the problem is transparency, or rather, the lack of it. The public believes discarded clothes will be reused or recycled, but there is almost never a way to trace whether or not that is what happens. The level of clarity and transparency varies a lot from one company to the other. Very few data points are available publicly and claims are rarely backed with verifiable figures, (see table below). Charities are the only entities that are transparent: sharing data on collected volumes and able to show effective reuse nationally. This is why we did not include charities in our investigation.

Take-back schemes and clothing banks, developed by fashion brands or private collectors, on the other hand, do not operate on a national level nor as non-profits. Their activity is not regulated. There is currently no obligation or harmonised way of reporting their activity under Irish or EU law.

Nevertheless, these stakeholders often present themselves as “recyclers” with claims highlighting their work as extending garment life, promoting circular fashion, and reducing textile waste. However, their reporting is **fragmented and often embedded within broader sustainability reports**, making verification difficult.

We investigated five major schemes operating in Ireland:

Table 1: Overview of brand collection and recycling schemes

	Claimed Scheme & Goal	Operator / Partner	Data Published	Observed Reality / Notes
ZARA (does not appear in the final study)	"Closing the Loop": collects any item for reuse or recycling, partners with local nonprofits	Not publicly specified	19,484 tonnes (2024) for 21,244 tonnes put on the market. Pledges to cut emissions 50% by 2030, net-zero 2040[12]	Textile bins were not found in any of the stores visited; staff was unaware of the scheme.
H&M	Collects old clothes in-store, discount incentive, promotes reuse & recycling	Loopertextile	17,100 tonnes collected (2024 report); Loopertextile claims: 65% reuse, 25% recycling, <10% disposal[13]	The investigation confirmed all items where received and treated by Looperstextile and produced a reuse rate of 50% and 25% incineration. No independent verification.
PENNEYS PRIMARK[14]	"Second life" via in-store collection; repair & recycling initiatives	The Yellow Octopus	638 tonnes collected globally (97.72 in Ireland); 69% resale, 31% recycled/ repurposed[15]	Clothes all followed the same journey to the Yellow Octopus facility. However, 5/6 items were sent outside the EU after sorting regardless of the condition. All items were put in the "Unclear fate" category due to limited verification possibilities.
M&S	Partnered with Oxfam Ireland for collection	Oxfam Ireland	M&S's scheme claims that "absolutely nothing goes to waste"[16]. Globally: "since 2008 the M&S and Oxfam Shwopping partnership has collected over 35 million items, contributing an estimated £23 million to Oxfam's vital work across the world. Clear out with a clear conscience"[17]	Confirmed 50% reuse in Ireland.
Clothes Pods (Textile Recycling Ltd.)	Claimed "recycled, reused or repurposed"	Textile Recycling Ltd.	None publicly available. Operates >2,000 clothing banks[18]	Exports all clothes outside of the EU; little oversight over what happens next.

[12] Inditex Group. (2025, March 12). *Consolidated Statement of Non-Financial Information and Sustainability Information 2024*. Inditex Group. https://www.inditex.com/itxcomweb/api/media/77dca039-4cbc-4665-ab47-d2eebbd3aac9/Sustainabilityreport2024.pdf?t=1742203076231

[13] H&M Group. (2023, March). *Sustainability Disclosure 2022*. H&M Group. https://hmgroup.com/wp-content/uploads/2023/03/HM-Group-Sustainability-Disclosure-2022.pdf

[14] For the purposes of this investigation and report, references to **Penneys** pertain to the Irish entity, whereas **Primark** refers to the global enterprise.

[15] Primark. (2024). *Sustainability and Ethics Progress Report 2023/24*. Primark. https://primark.a.bigcontent.io/v1/static/Primark-Sustainability-and-Ethics-Progress-Report-2023-2024

[16] Marks & Spencer. (n.d.). Plan A Shwopping. Retrieved November 20, 2025, from https://www.marksandspencer.com/ie/c/plan-a-shwopping

[17] Marks & Spencer. (n.d.). *Plan A Shwopping* [Web page]. https://www.marksandspencer.com/ie/c/plan-a-shwopping

[18] https://clothespod.ie/

The gap between claims and reality.

There are multiple reasons that lead us to question the claims made and wanting to find out more about the real journeys clothes take on and their fate.

"Repurposing" can mean almost anything.

Several brands report that unsellable textiles are "repurposed," a vague term that can cover anything from downcycling into industrial rags or insulation to creative reuse or even energy recovery. Without a clear definition, it's impossible to distinguish meaningful reuse from simple disposal under a different name.

Sorting with the intent to reuse is not the same as reporting on end fate and reuse percentage

Many scheme operators publish sorting figures (for instance, "65% reused, 25% recycled"), but these numbers only describe the *intended* outcome, not the verified destination and use. Once textiles are exported, there is no public tracking or auditing of whether they are truly reused, recycled, or discarded.

The numbers don't add up.

Globally, less than **1% of textiles are recycled into new textiles**[19]. Despite large-scale collection claims, there is no public evidence showing that the materials gathered through take-back schemes are actually being turned back into new fabrics or garments. "Sorting for recycling" does not mean the textiles are recycled: only that they are set aside as potentially recyclable. What happens next is not disclosed.

In the past, independent investigations raised a troubling reality.

Reports from organisations such as **the OR Foundation** and **the Changing Markets Foundation**[20] or **Greenpeace**[21] have documented the fate of exported textiles arriving in countries like Ghana and Kenya: mountains of poor-quality garments, much of it unsellable, clog local markets and end up dumped, burned, or washed into waterways. These findings expose another version of the story told by companies and "recyclers".

We aimed to conduct research which would address the lack of transparency cultivated within the system

Because collectors, brands, and intermediaries are not required to disclose where clothes end up or how they are treated, every link in the chain can present optimistic claims without accountability. Transparency is replaced by trust: but trust alone cannot verify circularity.

[19] Ellen MacArthur Foundation. (2017). *A New Textiles Economy: Redesigning Fashion's Future*.

[20] Ricketts, L. & Skinner, B. (2023). *Stop Waste Colonialism: Leveraging Extended Producer Responsibility to Catalyze a Justice-Led Circular Textiles Economy*. The OR Foundation.

[21] Greenpeace Africa. (2024). *FACTSHEET : DRAPED IN INJUSTICE— UNRAVELLING THE TEXTILE WASTE CRISIS IN AFRICA*.

The Investigation

The investigation

This is not the first time the ethics of the global second-hand clothing trade have been questioned. In 2022, the Changing Markets Foundation[22] tracked garments donated through major brands' take-back schemes, uncovering a shocking lack of transparency along the reuse chain. Their findings inspired us to test the Irish context and see where clothes discarded by consumers here really end up. We decided to focus on private actors that aren't currently reporting consistently and providing much data publicly.

Designing the Investigation

Our investigation took place over 10 months (December 2024 to October 2025) and started with 38 items of clothing tracked using Apple AirTags.

Before launching the experiment, we reached out to the Changing Markets Foundation to learn from their experience and adapt their approach to the Irish system. We then consulted a technician to evaluate available tracking technologies.

Apple AirTags were chosen as the most affordable, reliable, and accurate tool available. Their small size made them easy to conceal, while their long-lasting and safe battery ensured consistent tracking over several months. GDPR and data protection standards were carefully considered when using the Apple Air Tags in the garments. We recognised that discovering a hidden tag could cause concern, so we concealed a waterproof QR code in each item. This code directed to a webpage explaining the project and providing our contact details, allowing anyone who found an air tag to reach out for more information. *Although to date, no one has contacted us about a found item.* Tracking was immediately disabled if an item entered a residential area.

To protect all parties involved, no exact addresses or identifiable locations are shown in our report or on the live tracking map created in August 2025 to allow the public to follow the items in real time until the end of the investigation. Instead, all locations are displayed as approximations within a 10 km radius of the true point.

After the garments were initially placed in their respective locations, their positions were tracked approximately twice a month. With every entry, garments that had changed location were cross checked in Google Earth to determine whether they needed to be deactivated. As we concluded this investigation, we disabled all remaining trackers.

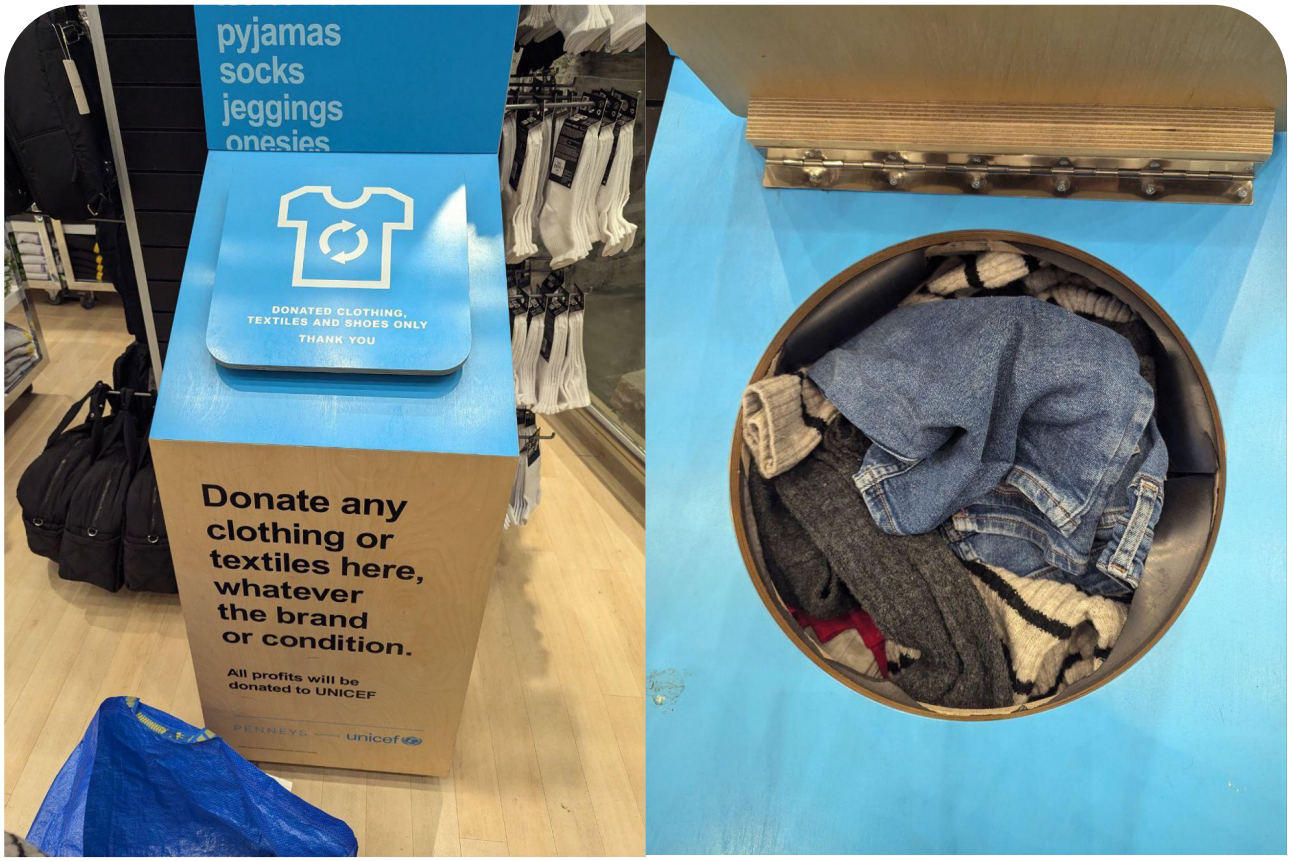
[22] Changing Markets Foundation. (2023, July). *Take-Back Trickery: An investigation into clothing take-back schemes.* https://changingmarkets.org/wp-content/uploads/2023/07/Take-back-trickery.pdf

Clothing Selection and Distribution

The sample included:

- 18 brand new items (with tags still attached)
- 18 used items in good condition with no defect
- 2 visibly unwearable or soiled items

We prioritised items that were perfectly reusable to give them the best chance at circularity and test best case scenarios. That is why, with the exception of 2 items that were visibly soiled and unwearable, we had an even number of either brand new with the tag (18 items) on or used but with no defects (18 items). The items were discarded across textile banks and take back schemes and across more than 10 different locations (Dublin county, Waterford city and Cork city).



Penney's take back box in Waterford City - VOICE Ireland Decembre 2024

Grey pants being discarded in bring bank - VOICE Ireland Decembre 2024

However, the proportion of used clothing was higher in textile banks in an attempt to reflect the reality of donations in Ireland. Donations in stores tend to be of clothes in better condition than donations in clothing banks. According to the EPA, 43% of Irish people consider textile bring banks as the correct way to dispose of unwanted clothes that are *not in good condition*[23]. The 2 visibly damaged items have been placed in clothing banks for that same reason. Our aim was to get an idea of whether these items would be treated differently.

Figure 2: State of clothes discarded

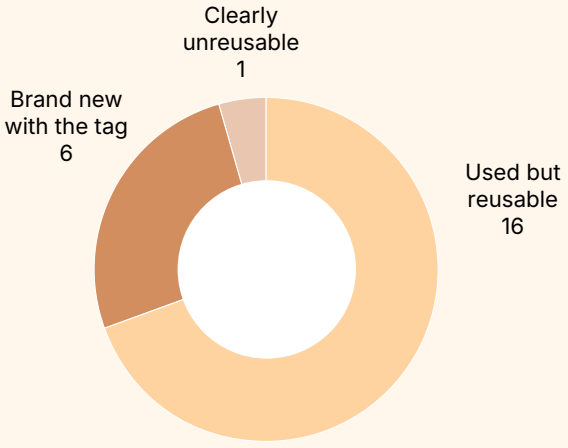
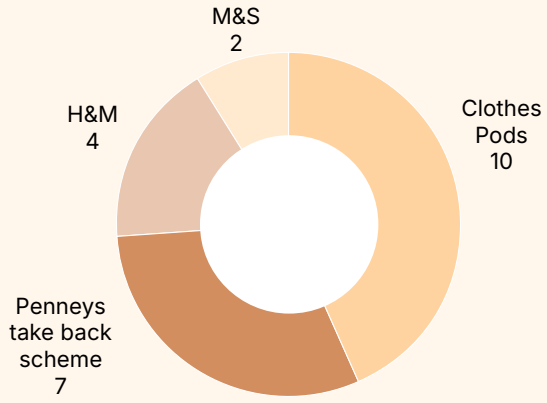


Figure 3: Companies and Schemes Involved

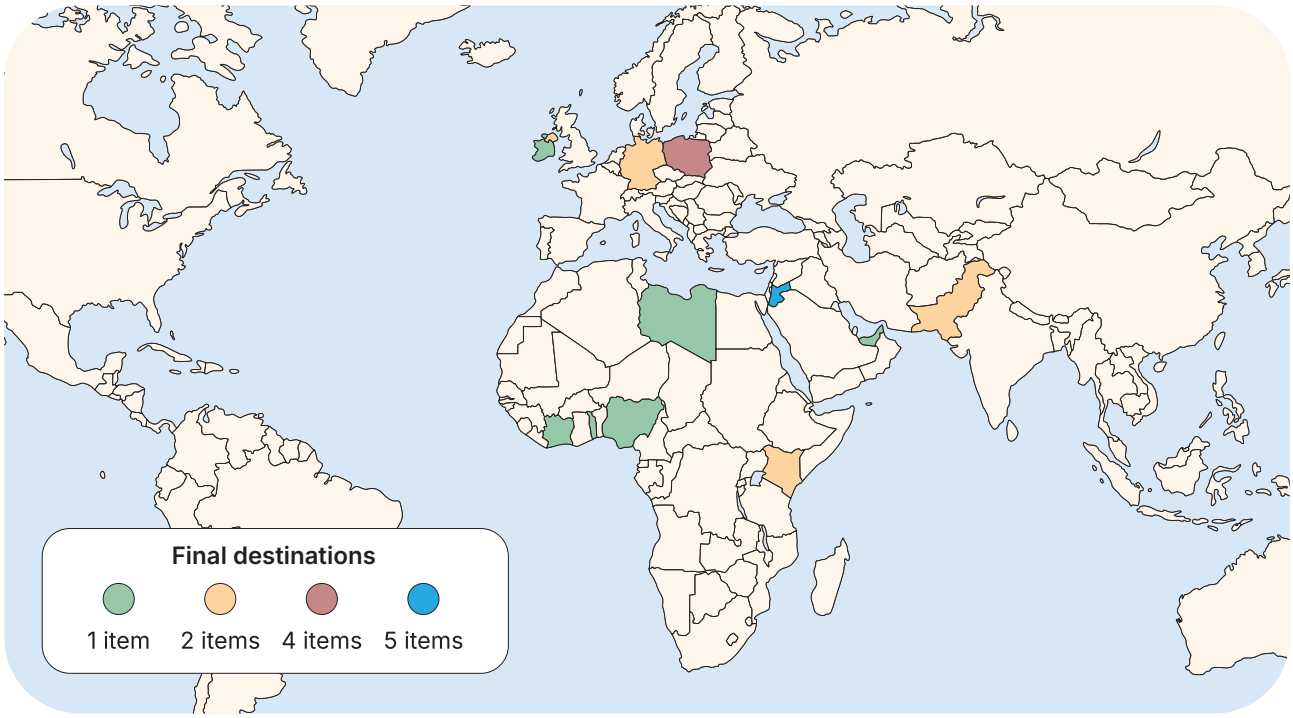


[23] EPA Circular Economy Programme & Ipsos B&A. (2025). TEXTILES ATTITUDES & BEHAVIOURS. Dans 2 Nd National Survey. Consulté le 14 octobre 2025, à l'adresse https://www.epa.ie/publications/circular-economy/resources/EPA-Textiles-2nd-National-Survey-Report.pdf

Results

Out of the 38 tagged items, we obtained reliable tracking data for 23, giving us a 63% success rate.

Figure 4: Overview of Threads of Truth items' destination.



We believe this partial loss may be due to damage to the tracking devices, poor weather or storage conditions. Nevertheless, the majority provided clear and consistent signals, enabling us to build a meaningful picture of where Irish clothes actually go once discarded.

Out of the 23 remaining items were able to establish a clear fate for 10 garments:

- 26% were reused (ending up in shops or residential areas),
- 4.3% was downcycled,
- 8.6% were dumped abroad, including the visibly unwearable item and 4.3% was incinerated.
- 56% ended with uncertain outcomes.

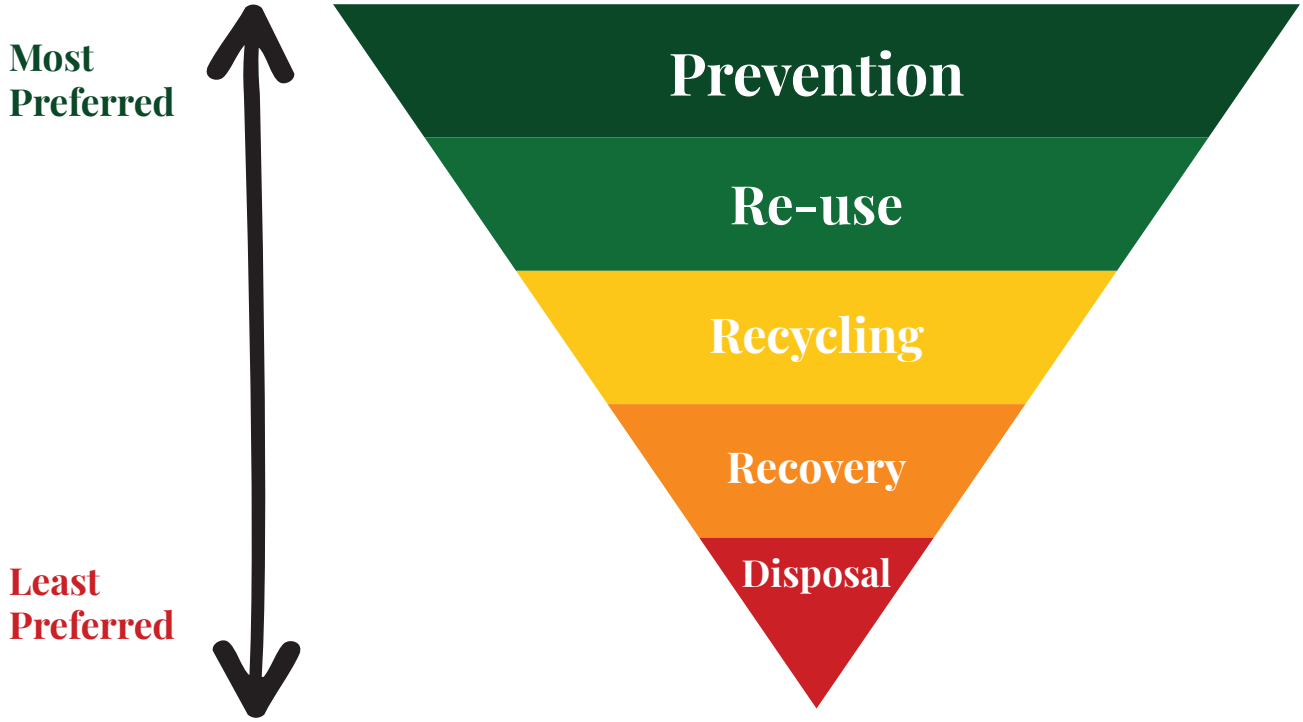
The items which ended up with uncertain outcomes either stopped in unusual locations (such as warehouses, the side of a road, or near transport hubs) or in places that couldn't be clearly identified. In several cases, the signal stopped after the item remained in a warehouse or sorting facility, suggesting possible deterioration of the tracker or destruction of the garment on site. Our assumptions range from items simply being stored and awaiting reuse, to being shredded, disposed of, or potentially landfilled in some cases (see page 32). Altogether, our tracked items reached 12 different countries, from Ireland and Poland to Kenya, Jordan, and Pakistan: a striking demonstration of the global fate of Ireland's used textile.

Analysis

Analysis

Final fates: massive export and unclear dominate

The circular economy is built on key principles designed to minimise waste and keep products and materials in use for as long as possible, reducing the need for new resources. One of its core foundations is the **waste hierarchy**, which outlines the priorities for achieving true circularity. At the top is **prevention**, which focuses on better design and sufficiency (reduction). Then **re-use** supports products to be used again in their original form, without the additional energy or processing, which are required for recycling. **Recovery** and **disposal** are the least preferred option since the value is lost and additional pollution is created in the process.



Source: ISM Waste & Recycling

Reused

The fashion industry has historically been an example of circularity before it was named as such. Its potential for reuse is very high, as clothing lasts for years when well-made and cared for. However, this potential has significantly declined in recent years. The rise of fast fashion has made clothing more disposable, with lower-quality garments that wear out quickly and attract little interest in the second-hand market. As a result, the value of used clothing has dropped, and the overall potential for reuse, the cornerstone of circularity, has been undermined.

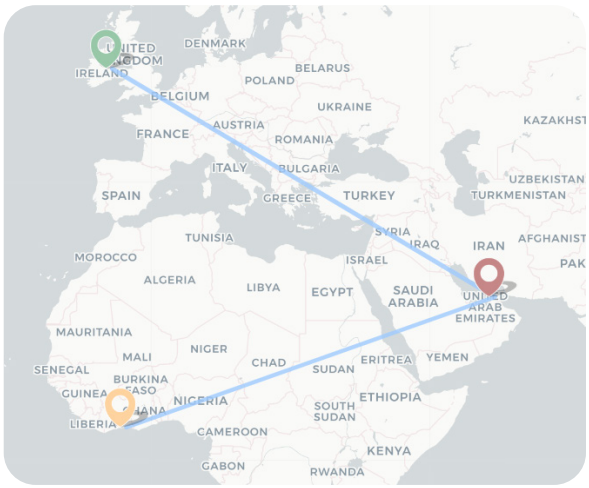
Items were considered to have been reused by our team as soon as they entered a residential area with no businesses around or were located in what could be established as a second hand shop.

Out of the 23 items that we tracked, 6 items have met the criteria to be considered reused and therefore have found a second life through resale. This represents about 26% of our experimented batch, underscoring how limited genuine reuse remains within today's system. These results are in line with the current estimates. However, it is worth noting that all items in this batch except for 1 were all in good condition, able to be reused. Although we had 6 brand new items with the tag on in the final batch, only 2/6 reused items were brand new, the other 4 were used items in good condition.

What was the journey to reuse?

3 items deposited in a Clothes Pods Clothes bank were reused.

A blue and red striped shirt found its way to a second-hand shop in Gniezno, Poland, while a purple shirt travelled even further from Trinity College Dublin to Sharjah (UAE) and finally to Abidjan, Côte d'Ivoire, where it resurfaced in a small second-hand shop that also seems to do upcycling.



Light Blue Shirt

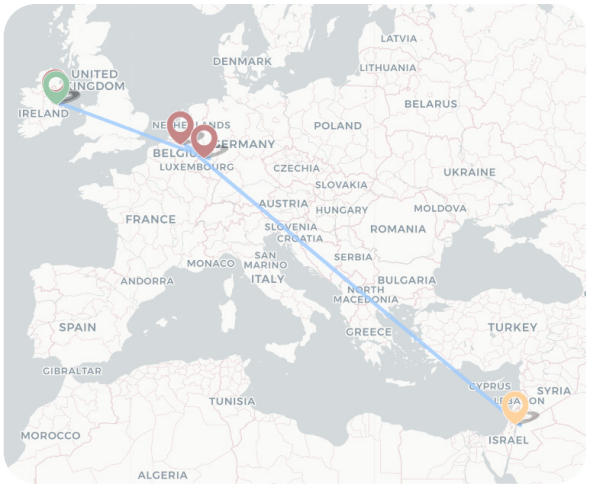
Brand	Zodiac
Condition	Used
Composition	100% Silk Touch Giza 87 (Egyptian Extra-Long Staple cotton)
Current Location	Abidjan, Ivory Coast
Previous Locations	Trinity College, Dublin Al Hamriya Port, UAE Abidjan, Ivory Coast

The third item: a light blue men's shirt went through Northern Ireland for sorting from where it was directly exported to Nairobi, in Kenya. It then arrived at the Gikomba clothing market before being last located in Buru Buru 2, in what seems to be a residential area.

A coffee-coloured sweater entered the M&S take-back scheme (operated by Oxfam), journeying through Northern Ireland before coming back to the Republic, in Waterford, where it was resold in a local Oxfam shop. This showed a quick and simple route to reuse.

Finally, 2 items deposited in H&M take back scheme were reused.

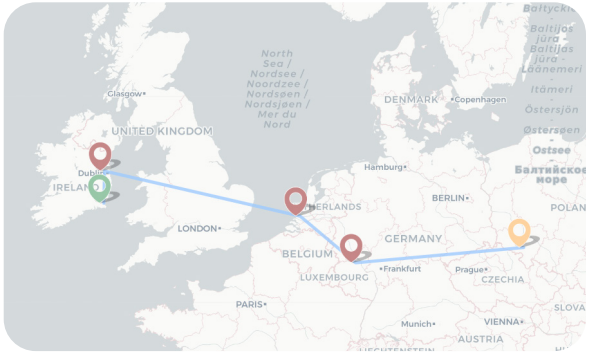
A pair of white wide jeans dropped off at H&M in Dublin first went to Polch, Germany where it stopped to be sorted at RE-textiles, a contracted company by Looper textile (contracted by H&M to operate their take back scheme). After being sorted, the item went through Belgium, before being shipped to Jordan, where it reappeared first in a harbour to finally reach a residential area, likely having found a new owner.



White Wide Jeans

Brand	H&M
Condition	New with tag
Composition	99% Cotton, 1% Elastane
Current Location	Amman, Jordan
Previous Locations	Inchicore, Dublin Damastown Avenue, Dublin Polch, Germany E313, Tessenderlo, Belgium Amman, Jordan

A pair of men's grey jeans was also reused through H&M, it went through a similar route from Dublin to Polch, but was assumed to be reused after reappearing near an automobile repair shop in a semi-residential area.



Grey Men's Jeans

Brand	Denim&Co
Condition	Used
Composition	98% Cotton, 2% Elastane
Current Location	Świdnica, Poland
Previous Locations	College Green, Dublin, Ireland Damastown, Dublin 15 Rotterdam Port, The Netherland Im Gohl, Polch, Germany Świdnica, Poland

These 6 items allow us to draw some data from our investigation. They reflect that only 4.3% reuse happens nationally. Overall, 3 (i,e, 13%) items were reused within Europe. And 13% reused abroad. This is a sobering reminder that most of what we discard will not make it back into people's wardrobes. Our findings show that true reuse remains the exception rather than the rule.

Even more revealing is what determines reuse: quality.

Five out of six reused items were made almost entirely of cotton: 98%, 99%, and 100% for 3 of them. The only blended item (57% polyester, 34% acrylic, 9% polyamide) was brand new with tags. This clearly establishes fibre composition and garment quality as key elements to a second life. Durable, high-quality fabrics are far more likely to be reused while low-quality, mixed-fibre garments are effectively designed for disposal.

Recycled or downcycling

Recycling in fashion operates very differently from most other industries. While recycling has become a key focus in sectors like plastics, glass or aluminium, the clothing industry remains far behind. Textile recycling has existed for decades, but only works effectively for non-mixed materials, ideally made from natural fibres. Today, however, around 70% of garments contain synthetic fibres blended with other materials, which are nearly impossible to recycle into new clothing with current technology. This leaves us with downcycling: turning textiles into lower-value materials like insulation or rags as the dominant option. While both recycling and downcycling deserve further innovation and investment, they will never be the ultimate solution to the crisis. It needs to be a last resort after prevention and reuse.

Only one item was confidently considered as downcycled. The grey turtleneck sweater made of a blend of synthetic fibres (56% Nylon, 44% Acrylic) was deposited in a local clothing bank in Ireland. After going through collection and aggregation sites on the island, the item was directly exported to Pakistan, where its final signal placed it in an industrial area. Several companies in that area are involved in the downcycling of imported used clothing[24,25].

Grey Turtleneck

Brand	Unknown
Condition	Used
Composition	56% Nylon, 44% Acrylic
Current Location	Faisalabad-Jaranwala Road, Pakistan
Previous Locations	Ballygunner, Waterford Carrick on Suir, Co. Tipperary Newry, Northern Ireland Lahore, Pakistan Faisalabad-Jaranwala Road, Pakistan

Its journey demonstrates that while being wearable, clothing can rapidly exit the reuse loop and enter waste-management streams. This item's fate suggests that fully synthetic garments have less chances at reuse. Although with only one item in our sample, it is hard to draw general conclusions.

[24] https://fatextiles.pk/
[25] https://interloop-pk.com/leading-textile-recycling-in-pakistan/

Dumped or incinerated.

At the very bottom of the waste hierarchy lies incineration and landfilling. In theory, these should only occur when no other option exists. In practice, however, disposal remains the dominant way of dealing with discarded textile. In Ireland, non-collected clothes are directly sent for incineration, while the ones that are collected and exported are difficult to trace once they have left the Republic of Ireland, as it enters the international export stream. There is no mechanism to ensure that the collected clothes are properly sorted and that the waste portions are managed properly, rather than ending up dumped or burned abroad.

Incineration.

The first case involves a pair of black joggers, in good used condition, deposited in one of H&M's in-store take-back boxes in Dublin. Within weeks, the item travelled across Europe, transiting through ports and sorting hubs before reaching Germany, where the tracker stopped at an industrial estate where two companies are close together: HDB Recycling and Bioenergy Hünxe.

Grey Lounge Trousers

Brand	Max
Condition	Old
Composition	52% Polyester, 48% Cotton
Current Location	Train station: North Rhine-Westphalia, Germany
Previous Locations	College Green, Dublin Damastown Industrial Park, Dublin 15 Dublin Harbour Port of Rotterdam, Netherlands Szecseny District, Hungary Regensburg, Germany Train station: North Rhine-Westphalia, Germany Hünxe, Rhine-Westphalia, Germany

Source: Google maps

HDB specialises in the treatment of mineral waste for use as substitute materials in construction and Bioenergie Hünxe operates a biogas plant. The most plausible conclusion is that the garment was diverted into energy recovery or material shredding and mixing.

The other two items in this category are assumed to have been discarded on-site after reaching second-hand clothing markets in the Global South. Both were disposed of via Clothes Pods.

The first item, a black turtleneck, initially went to Latvia where it was stored for 2 months. It then went to Poland (most likely for sorting), before reappearing in Pakistan where it was located at 3 different places, before last signaling in Karachi. The last location seemed to be an industrial area surrounded by construction sites and companies. We were able to establish that Karachi has long been facing issues of waste dumping (chemical waste, packaging and textiles) with the multiplication of illegal landfills[26].

[26] M. Shehzad, A. Bano, H. Kazmi, and J. Iqbal, "Current State of Textile Waste Management in Pakistan-A Case of Karachi, Pakistan," Pakistan Journal of Scientific & Industrial Research Series A: Physical Sciences, vol. 67, no. 2, pp. 164–172, 2024.

Source: Google Earth view

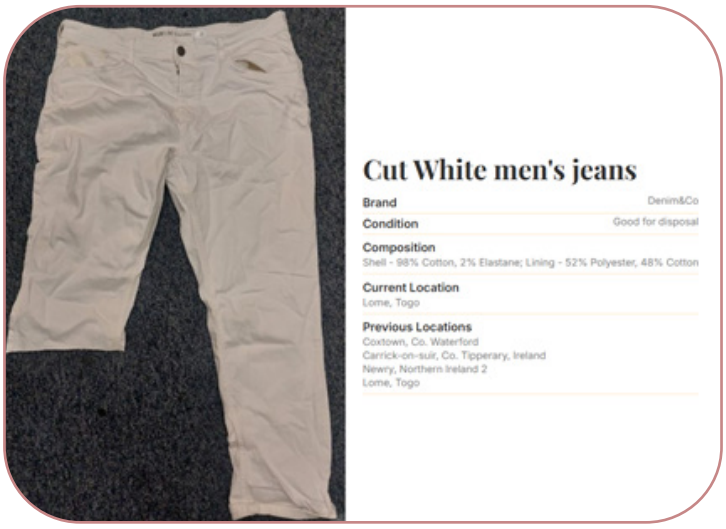
> *"In urban areas, textile waste often accumulates in landfills, taking decades to decompose while releasing harmful greenhouse gases. In Pakistan, researchers estimate that textile waste reaches approximately 270,125 tonnes annually, with Karachi alone generating around 19,300 tonnes.[...] Pakistan's textile industry remains inadequately equipped to implement sustainable waste recycling practices."*[27]

This strongly suggests it was not recycled, but rather discarded or destroyed at a construction site due to limited waste management infrastructure.

Source: Greenpeace / © Kevin McElvaney. Gikomba market in Nairobi: the ground is covered with layers of textile waste. / Greenpeace

[27] Fatima, M., & Fatima, M. (2025, 30 mars). Fashion Industry Dumps a Truckload of Textile Waste Every Second. Bloom Pakistan. https://bloompakistan.com/fashion-industry-dumps-a-truckload-of-textile-waste-every-second/

This garment should never have been exported



Another item provides our most compelling evidence for the need for stronger regulations. This white men's jean followed a similar route, passing through Northern Ireland before reaching Lomé, Togo. Like the previous item, it stayed there a few weeks before losing signal. However, unlike the first item, this garment **should never have been exported**: it was visibly damaged, with one leg cut in half, making it clearly unsuitable for resale. Yet it ended up in the middle of a local second-hand market. Lomé has no recycling facilities for textiles, meaning the item was sent to a place *under the label of reusable*, showing how blurry the line can be between recycling and waste dumping.

This example highlights a critical traceability failure: the item's export violated basic principles of circularity, exposing the systemic risks of self-regulation. It mirrors broader patterns observed across Europe: recent studies in Italy, the Czech Republic, and Romania[28] show that while about 75% of exported post-consumer textiles (PCT) are defect-free, roughly 25% have visible flaws and are unlikely to be suitable for re-wear but are still shipped abroad. The profit-driven model, focused on resale rather than proper waste management, creates little incentive to ensure genuine reuse or recycling.

Together, these cases underline the urgent need for harmonized export regulations, mandatory reporting, and stricter enforcement to prevent damaged or unsellable textiles from being dumped in countries without proper waste management. The second item, in particular, is proof that the current system allows clearly unusable garments to be exported, demonstrating a clear gap between policy claims and real-world outcomes.

[28] Bakowska, O., Mora, I., Walsh, S., van Duijn, H., Novak, M., Cherubini, G., Joshi, R., Morbiato, A., Visileanu, E., Veselá, A., Ryšavá, E., & Holický, M. (2025). Fate and composition of textile waste from Italy, the Czech Republic and Romania (D. Huygens, Ed.). European Commission, Joint Research Centre.

The main category: Unclear

The “Unclear” category comprises clothing items for which the final fate could not be confidently determined, underscoring major gaps in transparency and accountability within the Irish textile recovery system. Out of the tracked collection, 14 clothes fell into this category, a significant share compared to the totals confidently labelled as reused, recycled, or dumped. The evidence from AirTag tracking, coupled with stakeholder interviews, shows many ended up stalled in foreign warehouses, in transit indefinitely, or located at ambiguous addresses such as roadside facilities or market-adjacent industrial parks.

The “Unclear” inventory is neither clearly reused nor verifiably disposed of, with trackers either losing signal or showing no further movement over months. Many such items were documented at sites in Jordan, Poland, or other export destinations typical in global second-hand textile flows, but whether they were resold, stored, or ultimately destroyed remains unresolved. Interview feedback from sector experts supports this interpretation: once items are exported, the chain of custody breaks down and clarity is lost, illustrating the systemic absence of harmonized rules and oversight. Notably, brands and private collectors are rarely compelled to reveal full post-export outcomes, leaving both NGOs and consumers unable to trace the end-of-life journey of their donations.

Examples:

- Multiple items deposited in take-back or clothes bank schemes wound up tracked to warehouse districts or remote transport hubs in Jordan, left unaccounted for weeks or even months.
- In these cases, sector literature suggests the chances of reuse diminish over time, with long stints in storage highly correlated with eventual dumping or burning, especially for low-quality garments typical of fast fashion.
- Correspondingly, some tracker signals ceased entirely in locations with no active resale or recycling facilities, pointing to probable energy recovery (incineration) or abandonment rather than true circularity.

Many of the tracked items in the “Unsure” category were originally donated via Clothes Pod banks, highlighting the ambiguity at the heart of the Irish textile recovery system. Unlike charity-run banks, which offer clearer reporting on local reuse, Clothes Pod handles a large share of discarded clothes but provides little visibility over final outcomes. Once dropped off, clothing is often exported overseas and may spend months in warehouses or ambiguous transit hubs, with no confirmed evidence of resale, recycling, or environmentally responsible disposal.

This lack of transparency means donors cannot be certain their clothes are reused or recycled as intended, leaving a significant gap between public expectations and actual practice. Interviewed stakeholders and sector researchers repeatedly cited Clothes Pod and similar private operators as central to the problem: they process vast quantities of clothing, but do not publish details about sorting, end destinations, or environmental impact.[29]

Ultimately, this ambiguity undermines trust and accountability in Ireland’s textile management infrastructure, with the Clothes Pod system illustrating the broader sector’s opacity and the urgent need for regulatory reform and public data on the fate of donated garments.

[29] VOICE reached out to Clothes Pods on multiple occasions throughout this investigation, to ask them to comment on our initial findings. We have not received any answers.

Take back schemes VS Clothing banks: Is there a difference?

Our investigation reveals a fragmented landscape in Ireland's textile collection with inconsistent levels of transparency and oversight. While some actors demonstrate efforts toward accountability, others remain opaque, raising serious questions about the real fate of donated textiles. The findings confirm one central point: without regulation and harmonised reporting, "reusable" often simply means "exportable."

Take back scheme: an uneven level of transparency and effective circularity.

M&S x Oxfam Ireland: Local Reuse and Traceability

Among all initiatives assessed, the Marks & Spencer (M&S) take-back scheme operated in partnership with Oxfam Ireland stands out as the most transparent.

2 items deposited in M&S produced data. One was successfully reused within Ireland demonstrating that when reuse is kept local, traceability improves dramatically and circularity is respected.

Mark Sweeney, Donated Goods Strategy Manager at Oxfam Ireland described the process as straightforward:

> *"A customer brings it into a Marks & Spencer store, they put it into the receptacle, it's all gathered up, put into hessians, brought to their distribution centre in Northern Ireland. Our truck collects it, brings it to our sorting centre, and it's redistributed to our shops. It's a very simple process."*

This simplicity allows visibility over the operations within the country, making M&S take-back scheme the only one to prioritise local reuse and that is able to report on effective reuse.

Another item was sent to the same distribution centre in Northern Ireland but stayed there much longer, before stopping to emit, making it part of the Unclear category.

Key Insight

M&S demonstrates that local reuse is possible and is the most transparent way to deal with used textiles. Within the scope of their operations, they maximize reuse to the highest standards. However, that transparency ends once the textiles leave their control, if remaining items are exported. The challenge is now to generalise their good practices across the board, while developing solutions to valorise non reusable items on the island. The model used by M&S could serve as a blueprint, setting a standard of accountability and encouraging systemic solutions.

H&M and LooperTextile: Promising results

H&M provides publicly available data on its take-back scheme: a rare practice among major fashion brands. These figures were partially confirmed by our investigation. Yet, the reuse rate appears lower than what is advertised (considering all items were reusable).

According to LooperTextile's claims, about 65% of collected garments are sorted for reuse, 25% for recycling, and under 10% disposed of. Our findings show a 50% reuse, 25% disposal (incineration) and 25% unclear, showing that the circular model, while promising, is not yet fully achieved in practice.

Penneys: One Route, One Fate: A confusing reality behind the claims

Primark's take-back scheme, operated through **Yellow Octopus**, presents a confusing contrast to other take back schemes. Despite a similar effort to address transparency through public reporting of:

- 638 tonnes collected (97.72 tonnes in Ireland)
- 69% "suitable for resale
- 31% "recycled or repurposed"

Our results highlight the limits of these claims and how the intent is not always followed by action. All 7 items deposited through Primark's boxes, whether new or old, followed the same route and were all attributed to the "Unclear" category, with no evidence of reuse after ten months.

After spending months in the Yellow Octopus facility in Poland: 4 items (2 new, 2 used) have travelled by ship to Jordan where they are now in what seems to be a warehouse in the middle of the road, with no sources indicating reuse or recycling facilities or companies in the area.

This particular case study shows not only the limit of our own experiment that was not always able to attribute precise fate to items, but also the persistent lack of transparency or accountability to provide the public with tangible proof supporting circularity claims by companies dealing with donated clothing.

What This Reveals

Despite its circular rhetoric, Primark's take-back scheme shows **100% uncertainty** in outcomes. We cannot draw any real conclusions regarding their take back scheme other than highlighting the lack of traceability. We would be more than happy to discuss these with Primark's or Yellow Octopus' teams to get more clarity. However, our queries to interview either company about their scheme and the transparency around it have not been answered.

Clothes Pods (Textile Recycling Ltd.): From Reuse to Waste Export

One of the main companies we have gathered data about in this investigation was the Textile Recycling Ltd., behind the well-known Clothes Pods. Originally we also discarded a few items in other private collectors' banks, unfortunately, they did not provide usable data. Clothes Pods dominates the market in Ireland with more than 2,000 banks across the country, making it a prime candidate in the study. We were able to gather data for 10 items.

Clothes Pods bring bank in Marley Park's parking - April 2025

Their case study illustrates another strategy that differs a little from take back schemes that all sort in Eastern Europe: they depend on export outside the EU, have very low transparency;no publicly available figures of volumes, destination, fates and a confusion between reuse and repurposing in their claims.

According to our findings, out of the 10 items tracked through Clothes Pods:

- 3 of items were reused abroad
- 4 had unclear outcomes
- 2 were dumped
- 1 were downcycled

8 out of 10 items were exported outside the EU after transiting through Northern Ireland: confirming that exports are a structural component, not an exception.

3 items were reused (in Nigeria, Poland and the Ivory Coast) proving that genuine reuse is still achieved through export. However, it only happened to clothes with a good composition, made of natural fibres and that have high value (100% cotton men's shirt, jeans).

One particularly striking case involving a pair of men's jeans with one leg cut off, clearly unsuitable for resale, was still exported to Lomé, Togo. This item exemplifies a traceability failure and potential waste dumping. Lomé has no textile recycling facilities; therefore, the jeans could not have been "recycled" as claimed.

Private Collectors: unregulated and unaccountable

Despite marketing themselves as "recyclers" or "reusers," some private collectors have an ambiguous position, with a very real risk of waste being exported under the label of reuse. With no obligation to report or prove outcomes, these operators highlight the urgent need for binding standards and audit requirements.

Conclusion

Conclusion

A Fragmented System in Need of Oversight

The operating systems between take-back schemes and private collectors vary, from more transparency (at least at first) to vague claims and no accountability. Yet neither side offers a fully circular solution. The most transparent schemes still lack consistent traceability across the whole chain while basic information on volumes collected aren't even communicated by others.

The current system depends on voluntary commitments, self-reporting, and good intentions: none of which guarantee accountability.

- Take-back schemes can foster local reuse when operating with local non-profits. Yet, they remain limited in scale and capacity, with very different results.
- Private collectors seem to benefit from export loopholes, perpetuating waste dumping under the guise of reuse and reducing the trust in the sector by not providing any transparency.

The solution lies not in voluntary action but in strong, harmonised legislation: mandatory traceability, export restrictions for damaged textiles, and transparent reporting requirements that ensure genuine circularity, not just circular rhetoric.

Our investigation has shown a mixed reality. On the one hand, we've highlighted genuine efforts to follow circularity principles. However, the textile waste crisis is real and undermines these efforts. According to our investigation, a minimum of 13.5% of the items tracked were dumped or destroyed. We have highlighted a system drowning in record volumes of used textiles, eventually losing the value of perfectly reusable items. This system needs to be reformed, and regulations tightened to avoid overconsumption and mitigate the impacts to communities and the environment globally.

If the high reuse claims were accurate, the situation on the ground would be very different. Yet cities like Accra, (Ghana), illustrate the real scale of the problem: the city has the capacity to process roughly 2,000 metric tonnes of waste per day, but the textile problem has grown so severe that almost double that volume is generated every 24 hours. The Kpone landfill, a 9.5-million-dollar bank-funded project opened in 2013 with the capacity to operate for 15 years, was filled in just five years due to the burgeoning textile waste stream[30]

[30] Besser, L. (2021, August 11). *Dead white man's clothes: How fast fashion is turning parts of Ghana into toxic landfill*. ABC News. https://www.abc.net.au/news/2021-08-12/fast-fashion-turning-parts-ghana-into-toxic-landfill/100358702

A real impact on communities.

The trade in second-hand clothing (SHC), or mitumba, in African countries is a deeply complex issue, blending economic, social, and environmental dimensions. On one hand, SHC provides affordable clothing options for millions of consumers with limited disposable income, often granting access to designer or trendy items otherwise unavailable locally. It also supports a substantial employment network: from transportation, cleaning, repair, and restyling, to sales and renting of market space, and even the emerging sector of upcycling and repurposing garments into higher-value products. In Kenya alone, the SHC industry employs around two million people[31], while across the continent, hundreds of thousands benefit from this sector. However, these jobs are often precarious, informal, and low-paid, offering little social protection. Waste pickers, market porters, and repair workers frequently face dangerous working conditions and limited labour rights. The economic benefits of employment in SHC therefore do not necessarily translate into quality or secure livelihoods.[32]

Economically, SHC also generates significant revenues for national governments through import taxes. In 2021, Kenya imported 183,500 tonnes of SHC, raising roughly $73.4 million in import tax revenue, equating to around $6 million per month.[33]

Yet the system also carries significant social and environmental costs. A large portion of imported garments: estimated at 30–40% in many markets[34], is of such poor quality that it cannot be sold or reused, creating substantial textile waste which can no longer be offloaded onto someone else[35].

Vendors at Gikomba market, in Nairobi [said] that these days they are

> *"Often disappointed when they open the bales, because nearly half of the clothes are unusable and have no market value: their quality is too poor, or they are broken or soiled and are nothing more than textile waste."*[36]

Small vendors, many of whom are deeply indebted, are particularly vulnerable: while importers and larger traders benefit, they are caught in a cycle of low-profit margins and growing amounts of unsellable clothing.

[31] Fibre2fashion. (2022). Second-hand clothing in Africa : Opportunities and challenges.

[32] Ify_Emeh. (2023, February 27). What Goes Around Comes Around : How The False Myth of Second-Hand Market Circularity Impacts African Countries - African Association of Entrepreneurs. African Association Of Entrepreneurs

[33] AfricaNews. (2023, October 16). Used clothing from the West is a big seller in East Africa. Uganda& # 039 ; s leader wants a ban. Africanews.

[34] Macintosh, E. (2025, May 28). EU exports of used clothing wear out African second-hand markets. New Leaf.

[35] Reporter, G. S. (2023, September 13). A ban on used clothing imports isn't the answer – Uganda must find homegrown solutions. The Guardian.

[36] Greenpeace International. (2022, April 22). *How Fast Fashion is using the Global South as a dumping ground for textile waste - Greenpeace International*

> *"In the evening some people burnt shoes and textiles on open fires to try to deal with the problem."*[37]

Municipalities bear the environmental and economic cost of managing these materials, without adequate waste management infrastructure.

Credit: Michael Takyi Lartey / Unearthed, Greenpeace

In sum, the African SHC market exemplifies the intersection of social, economic, and environmental factors. It supports livelihoods and generates revenue, but it also produces waste, precarity and strains municipal systems. Effective solutions require both a recognition of historical responsibility and a commitment to integrated strategies that balance economic benefits, social equity, and environmental sustainability.

[37] Greenpeace International. (2022, April 22). *How Fast Fashion is using the Global South as a dumping ground for textile waste - Greenpeace International*

Responsibility and accountability: everyone is concerned.

The current system is fundamentally broken

Until the early 2000s, reuse chains were more efficient: garments were of higher quality, easier to repair, and had genuine resale value. The explosion of fast fashion: with overproduction, overconsumption, and poor material choices, has upended this balance. Low-quality, synthetic clothing dominates the market, dramatically decreasing the potential for reuse or recycling. What once held long-term value has become short-lived and with diminished value. As Mr Sweeney from Oxfam noted,

> *"The reuse sector gets tarred with this brush that it's being dumped on beaches and in rivers, which isn't the case but ultimately, any clothes that end up anywhere are items that we all buy and someone else has to take responsibility for The ones responsible are the producers, who continue to market and produce more than we need ."*

Fast fashion has not only flooded global markets with non-recyclable textiles but has also transferred the cost of managing this waste onto charities, collectors, and receiving countries. Textile banks and take back scheme were once a way to gather quality items and give them a second-life. However, they tend to now serve as **a convenient outlet** for discarding low-quality garments only after a few wears. Charities are left to handle vast volumes of items that aren't made to be reused and that have a low value on the market: the consequence of a broken linear model masked as circularity.

We've carried out this investigation to highlight the lack of transparency and accountability from actors in the trade of used clothing because we believe this is a gap in legislation that can be addressed fast and needs to be done as a baseline for any further policy to be anchored in a truly ethical and sustainable way, considering environmental justice seriously. Yet, we want to take the time to stress out the fact that the responsibility is shared.

Producers and brands

Producers have a long way to go from fast fashion models to reasonable and sustainable business models. The take back schemes are a step in the right direction, although not all are bringing proof of circularity. A clear disconnect takes place between their attempts at circularity and the refusal to question the very model they operate on. Fast fashion is not compatible with circularity. A striking example is Zara. Even if not included in this investigation, we researched their efforts. Their global take-back programme collected 19,484 tonnes in 2024. However, they placed 621,244 tonnes on the market, meaning that they have a recovery rate of just 3%. Such figures highlight the gap between brand

rhetoric and measurable impact. Similarly, Penneys presents their 638 tonnes collected[38] as strongly tackling the textile waste crisis. While this is a commendable effort, questions remain about the consistency of these commitments when crossed with the fact that Primark does not disclose how much clothing it places on the market. According to the Changing Markets Foundation's *Synthetics Anonymous 2.0* report (2023)[39] Primark is one of the 71% of brands surveyed that still fails to report production volumes or fibre composition, limiting transparency across the sector. It is therefore reasonable to assume that the volume of products sold by Primark outweighs by far what is collected. Moreover, the industry is expected to grow by about 60% by 2030 (from 2023 levels)[40], far exceeding any current investments in waste management, reuse, or recycling infrastructure.

Brands seem to be only addressing a part of the problem they create, without being willing to address the root.

True accountability requires moving beyond declarations of intent and treating the cause rather than the consequence. Stakeholders should not only claim reuse or recycling but prove it: through traceable data, third-party verification, and transparent reporting. Responsibility must indeed be shared among producers, policymakers, consumers, and waste operators, but accountability cannot be diffused. Those profiting from production and trade must bear the responsibility of ensuring their products do not become someone else's waste. Yet, at the current rate low quality items are being produced, it seems as though reduction should be the main focus.

Consumers

Consumers also have a crucial role to play in addressing textile waste. Convenience and lack of information often drive our choices. Many of us see take-back schemes or donation banks as a way of disposing of unwanted clothes, thinking reuse or recycling automatically follows. As highlighted earlier: 43% of Irish people consider textile bring banks as the correct way to dispose of unwanted clothes that are not in good condition[41]. Yet, as our investigation shows, collection does not guarantee circularity. Once clothes leave the country, their fate becomes uncertain.

Beyond this knowledge gap lies a deeper issue: overconsumption. Donation systems have increasingly become a convenient outlet to allow us to buy more: a way to clear out wardrobes every few months, to make room for the next trend. But true circularity requires a mindset shift. It means slowing down, being intentional about what we buy, wear, and pass on, and valuing quality over quantity.

[38] Primark. (2024). *Sustainability and Ethics Progress Report 2023/24*. Primark. Retrieved from https://primark.a.bigcontent.io/v1/static/Primark-Sustainability-and-Ethics-Progress-Report-2023-2024

[39] Changing Markets Foundation. (2021). *Synthetics Anonymous: Fashion brands' addiction to fossil fuels.* Changing Markets Foundation.

[40] Echeverria, C. A., Handoko, W., Pahlevani, F., & Sahajwalla, V. (2018). Cascading use of textile waste for the advancement of fibre reinforced composites for building applications. *Journal Of Cleaner Production*, *208*, 1524-1536. https://doi.org/10.1016/j.jclepro.2018.10.227

[41] EPA Circular Economy Programme & Ipsos B&A. (2025). TEXTILES ATTITUDES & BEHAVIOURS. Dans 2 Nd National Survey. Consulté le 14 octobre 2025, à l'adresse https://www.epa.ie/publications/circular-economy/resources/EPA-Textiles-2nd-National-Survey-Report.pdf

According to Claire Downey, CEO of the Rediscovery Centre:

> *"A lot of textiles that are being bought at the moment are really low quality and don't have any re-wear value so if we send them overseas, we can't expect people to re-wear them."*
>
> (as cited in *RTÉ News*, 10 Nov 2025)[42]

This is precisely what **Fabric of Change** works towards: helping people question their relationship with fashion and engage in individual change that supports broader systemic transformation. By embracing community-based models that prioritise wellbeing, sufficiency, and care, we can create a culture where fewer, better-quality items circulate for longer.

If we reduce production and consumption to sustainable levels, the growing ecosystem of reuse, repair, and recycling initiatives will have the capacity to truly close the loop. Circularity begins not just with technology or policy, but with a shift in how we see clothes: from disposable commodities to valuable resources.

Systemic solutions are within reach:

- Harmonised definitions of "reusable" and "recyclable" textiles.
- Export rules that prevent low-value textiles from being disguised as reuse.
- EPR schemes rewarding verified reuse here and abroad, and domestic recycling.
- Transparent reporting at every step of the value chain.

Only with such measures: and with proof of outcomes rather than promises, can Ireland and Europe move from symbolic circularity toward genuine textile responsibility.

[42] *RTÉ News*. (2025, November 10). *Bursting at the seams: Ireland's problem with textile waste*.

Recommended Actions

Recommended Actions

VOICE wishes to acknowledge the important work undertaken by the Department of the Environment, Climate and Communications (DECC) and the Textile Advisory Group in developing Ireland's National Policy Statement and Roadmap on Circular Textiles. This collaborative process has provided a valuable platform for dialogue across the sector and led to a stronger, more informed policy framework.

The following recommendations aim to reinforce and complement actions already reflected in the draft document, while calling for more ambitious and binding measures in some aspects. Our approach is founded in a systemic vision of circularity, one that begins with prevention and reduction, and ensures that responsibility and transparency are embedded across the entire value chain.

Based on the findings of this report, a series of recommended actions are essential to address the systemic failures and environmental injustices embedded in the current management of post-consumer textiles in Ireland.

For policymakers, the foremost priority is to introduce clear, enforceable transparency and traceability obligations across the entire textile collection, sorting, export, and disposal chain. Mandatory disclosure of post-collection outcomes must become standard practice to close the pervasive information gap about where donated textiles actually end up. Policymakers should also prioritise implementing Extended Producer Responsibility (EPR) schemes that go beyond simple waste management to incentivize garment reduction, reuse, and high-quality production, ensuring producers are accountable for the full lifecycle of their products. Furthermore, investments in robust national infrastructure for textile reuse and recycling will help alleviate the dependence on exports and reduce the environmental and social costs imposed on countries in the Global South. Harmonised export regulations and stringent enforcement are urgently needed to prevent the export of damaged or unsellable textiles, which contribute to uncontrolled dumping and environmental harm abroad.

The business community must amplify its commitment to circularity by improving garment design and quality to extend product life and reuse potential. Transparent and independently verifiable take-back and recycling schemes should be implemented, moving beyond vague claims to demonstrate genuine environmental benefits. Collaboration with third-party organizations to track and report on textile fate can build consumer trust and drive systemic improvements.

While we want to highlight that systemic change depends on policy and business action, there are certain things that individuals can do to make a change. Consumers can support sustainability by choosing higher-quality fabrics that last longer and have better reuse potential, being mindful of where and how they donate or dispose of unwanted clothes to ensure they enter genuine reuse or recycling channels. Advocacy for systemic reform holds the greatest promise for breaking the cycle of overproduction, waste, and environmental injustice.

We have compacted these actions into 4 policy asks. Together,they form a coordinated approach targeting the root causes of the textile waste crisis. Addressing business models, transparency, accountability, and end-of-life management will shift Ireland’s textile system towards true circularity, supporting environmental sustainability and social equity at home and globally.

1. Addressing the root causes

Tackle fast fashion models and overproduction

The root driver of textile waste is production volume. Circular design alone can't fix a market that keeps making cheaper, lower-quality clothes. Turning the tap off means making production and price signals reflect environmental and social costs.

Key actions

- Introduce taxes, levies or minimum pricing on ultra-fast fashion imports.
- Ban or heavily restrict predatory pricing and loss-leader strategies linked to disposable clothes.
- Require producers to publish sold volumes in Ireland.
- Introduce ambitious prevention and reduction targets such as
  - Requiring producers to reduce volumes placed on the market by 20% by 2030. This could be operationalised via EPR eco-modulations (see below).
  - Cut new textile consumption by 10 kg per capita per year by 2030.
  - Double repair rate of textiles by 2030.

Shift consumption patterns by enable sufficiency and repair

People need accessible, affordable ways to keep clothes in use: repair, reuse and longer ownership must be made easier and cheaper than replacement.

Key actions

- Reduce VAT rates on repair services and circular textile businesses (tax relief for small businesses).
- Fund community repair hubs and subsidised repair vouchers for low-income households.
- Support clothing social-enterprises that offer subscription, reuse, rental and swap schemes (e.g., tax incentives or funding, subsidy implementation in shopping centers etc...).
- Regulate advertising for disposable fashion (time/placement restrictions; require sustainability claims to be evidenced).

2. Accountability

Without credible data and control mechanisms in place to monitor what's collected, sorted, exported, reused or recycled, accountability cannot be reached. Contracts and public tenders must require traceability.

Transparency and traceability

Key actions

- Mandate contractual reporting and targets for all public contracts and tenders for textile collection (volume collected, sorted categories, destinations, buyers, export manifests).
  - Explore joint action and rules harmonisation with Northern Ireland.
- Implement a national textile traceability registry (digital tags, bale IDs) that records collection point, sorter, buyer, destination and fate.
  - Facilitate reporting by providing a national register form for each of these stakeholders dealing with Irish used clothing.
- Establish harmonised preparation for reuse criteria and transparent feedback loops between collectors, sorters, exporters, reuse operators and waste workers.
- Explore end-destination traceability and mechanisms to evaluate effective circularity of exported used textiles; publish aggregated destination data.
  - Support bilateral agreements with key destination countries to ensure imports meet minimum quality and traceability standards.

For textile collectors/exporters

Key actions

- Adopt a Code of Conduct for own operations and for downstream operators with emphasis on:
  - Working conditions, wages and health and safety
  - Targets for reuse and recycling shares and treatment options for remaining waste
  - Effective and regular monitoring, reporting and follow-up
- **Following M&S and Oxfam's partnership**, where possible, prioritise Irish partners that will prioritise national reuse through their own retail shops rather than wholesalers to improve or simplify traceability
- Investigate opportunities to support better transparency and treatment of post-consumer textiles in developing countries.
- Engage in projects with the aim of increasing reuse and recycling within Irish markets.

3. Local sorting, reuse and valorisation

Ireland does not have the ability to deal with its own non-wearable textiles and relies on export with little transparency. We have a responsibility to retain these non-wearable items and dispose of them ethically, in Ireland or in a transparent way with European partners.

Key actions

- Tighter control and oversight on exported textiles previously sorted for recycling and/or contain hazardous levels of contaminant.
- Create capital grants or soft loans for sorting and grading facilities that respect reporting criteria. Target a minimum pre-processing capacity (e.g., pilot 5,000 tpa) with public support.
- Offer preferential procurement / resale channels for charities in public tenders.
- Create public-private innovation calls for both open and closed-loop recycling pilots, with guaranteed feedstock supplied via pre-processing hubs.

Note: Charities are a vital part of reuse ecosystems; their model must be supported and expertise used as a blueprint in the allocation of reuse funds.

4. Designing the upcoming EPR for reuse first and international justice

EPR must reflect global flows and incentivise quality, reuse and domestic recycling: not just fund collection. A travelling-fee and eco-modulation can support systemic change.

Key actions

- The EPR fees need to reflect **the real cost of textile collection,** processing and waste management. Existing EPR schemes in France and The Netherlands[43] have been criticised for having a fee that falls drastically below what has been calculated as the actual cost necessary to support circularity.

The cost of only sorting textiles in Europe is estimated at €0,35[44] per item, not to mention internalising total costs of transport, processing and waste management and disposal costs. On the other hand, textile resale, logistics and waste management in Ghana add up to €1,48[45] per garment. With eco-modulation this could translate to an EPR fee between **€0,47 and €2,34** per garment (outside of eco-modulations).

- Include a progressive fee based on volumes to tackle overproduction.
- Build EPR with **eco-modulated fees**: lower fees for durable, repairable, mono-material garments; higher fees for mixed-synthetic garments.
- Introduce a **travelling fee**: a capital transfer mechanism into the EPR policy to promote equitable distribution of fees along the whole value chain. Funds would be paid only when exporters can demonstrate compliant, transparent downstream handling.
- Use EPR revenues to fund sorting, closed-loop R&D, and to pay charities for verified national reuse outcomes.

[43] Ministerie van Infrastructuur en Waterstaat. (2024, February 2). *Destinations of Dutch used textiles: Uses and risks after export*. Government of the Netherlands.

[44] Fashion for Good and Circle Economy Foundation. (2022). Sorting for Circularity Europe: An Evaluation and Commercial Assessment of Textile Waste Across Europe. Retrieved from: FFG website

[45] The OR Foundation (2023, February 14). Stop Waste Colonialism: Leveraging Extended Producer Responsibility to Catalyze a Justice-led Circular Textiles Economy. Retrieved from: Stop Waste Colonialism website

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