

MAPPING OF EPR SCHEMES AND PROS

Deliverable 2.1

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Responsible Partner	MODINT
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Author(s)	Pasquale Campanile, Peter Koppert
Contributing Partner(s)	RETEX.Green, EURATEX
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TABLE OF ABBREVIATIONS

Abbreviation	Definition
M	Month
EU	European Union
WP	Work Package
KPI	Key Performance Indicator
EC	European Commission
ESPR	Ecodesign for Sustainable Products Regulation
EPR	Extended Producer Responsibility
WFD	Waste Framework Directive
PRO	Producer Responsibility Organisation
POM	Put On the Market
IPR	Intellectual Property Rights
IP	Intellectual Property
GDPR	General Data Protection Regulation
EUTT	European Union Technical Textile

EXECUTIVE SUMMARY

This report represents a synthesis of the findings of Task 2.1 that included a comprehensive analysis of existing and under development EPR schemes in different EU Member States, as well as a detailed analysis of the existing Producer Responsibility Organisations (PROs) focusing on representativity, business models, organization and stakeholder engagement.

To collect the information, a survey among relevant stakeholders, namely PROs, industry associations and waste management companies, was carried out in the period between July and October 2025.

The participation and representativity of the respondents qualify the information collected and the findings that are instrumental to the next activities of the project. The collaboration with the PRO Forum has been particularly effective.

The report describes the overall picture of the EPR/PRO ecosystem in different EU Member States and in the UK, indicating several gaps and market failures hindering the progress towards circular textiles.

The report is public, available to all actors interested to support the co-creation of a circular ecosystem in Europe, a scenario that is expected to evolve dynamically in the coming years. The Circula-Tex partners welcome the opportunity to interact with interested stakeholders to extend and refine the analysis also in view of issuing an updated version of the deliverable report by December 2026.

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1. OBJECTIVES OF THE WORK

Task 2.1 of the Circula-Tex project focuses on performing a comprehensive analysis of existing and developing EPR schemes in different EU Member States and PROs focusing on representativeness, business models, organization, governance and stakeholder's engagement.

The objectives of Task 2.1 include performing a scenario analysis across different Member States, identifying infrastructural gaps and market failures hindering the progress towards circular textiles and fostering knowledge and exchange of good practices between PROs already operational and others that are expected to be established during the project execution.

2. THE SURVEY

To collect the information, a survey among relevant stakeholders was carried out in the period between July and October 2025. The questionnaire is enclosed as Annex 1. The administration was made by e-mail.

2.1 OBJECTIVES OF THE SURVEY

To collect relevant information on the state of development and implementation of EPR schemes and PROs in as many as possible member States to define a comprehensive picture of this ecosystem across the EU.

The aim is therefore to create a solid baseline of information updated to mid-2025 to be shared among stakeholders and used as a starting point for defining priorities, guidelines, and best practices towards harmonization.

2.2 TARGET GROUPS

PROs in different EU Member States and non-EU countries, both established and in the process of being established, to encompass different levels of maturity of the EPR scheme and PRO activity in each country. The survey addressed also textile business associations and waste management companies that are taking an active role in the promotion or establishment of textile PROs.

2.3 OUTPUTS AND TIMELINE

Mapping of EPR schemes and PROs, Public Report, December 2025

EPR Gap Analysis Report, Public Report, September 2027.

3. RESULTS

3.1 RESPONDENTS / REPRESENTATIVENESS

The subjects that responded to the survey include 24 organisations from 19 countries, including 2 from the UK. Of these, 14 respondents are PRO already active and 3 operate in countries where EPR is in force.

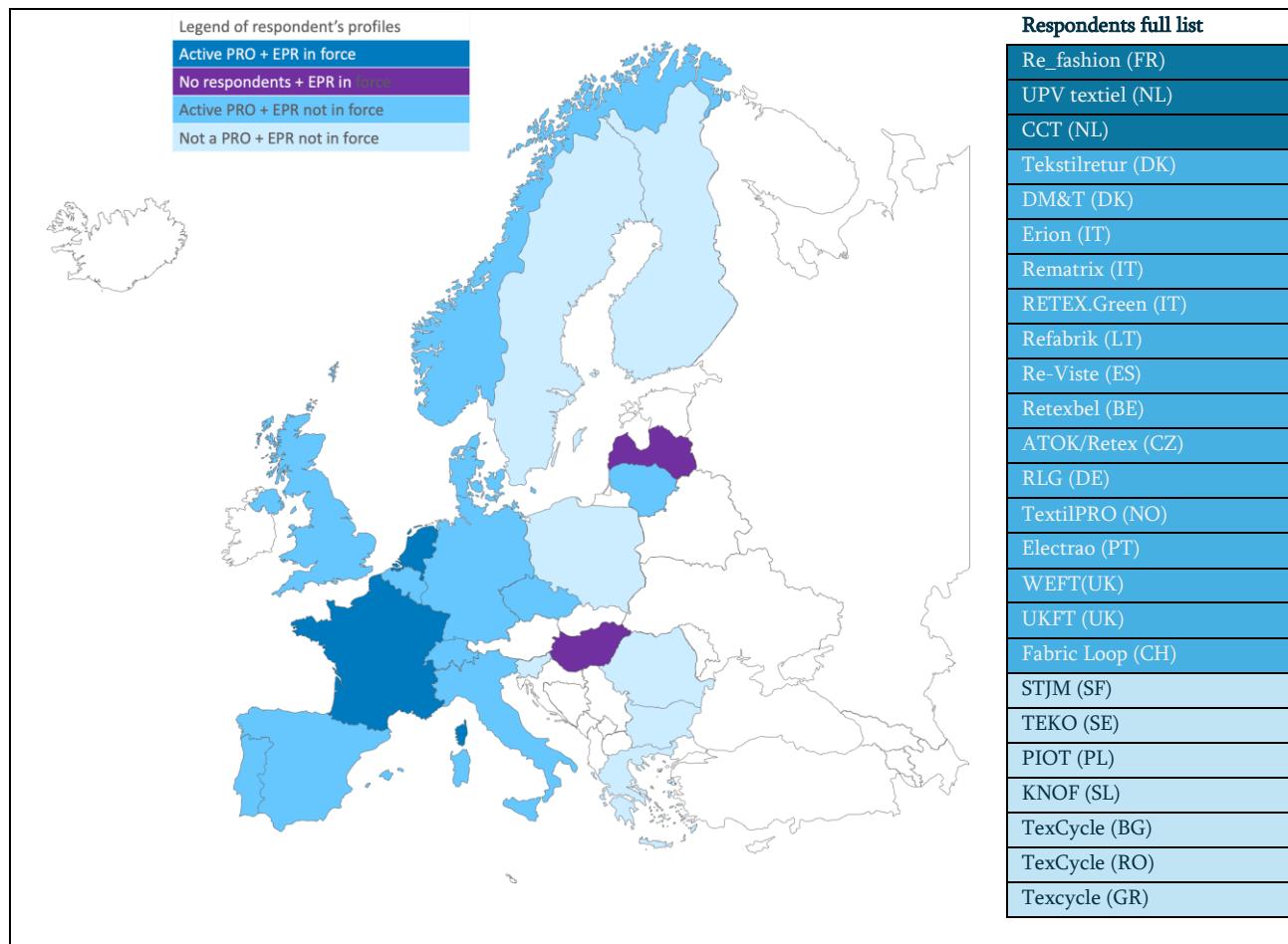


Fig.1 – Respondents to the survey
(note: including Hungary and Latvia with EPR in force but no-response)

The overall picture that emerges indicates that the majority of the EU27 member states (18 countries including Hungary) and Norway, Switzerland and the UK have taken initiative to establish one or more producer responsibility organizations unless most countries do not yet have an EPR scheme in force.

Most of these countries indicate that they will follow the timeframe of the WFD-EPR textiles and footwear implementation (see par. 3.3).

The four member states with an EPR scheme in force face different PRO situations. In France since 2008 the function of PRO has been assigned to Refashion. In the Netherlands there are three PROs active, one initiated by business associations (UPV-textiel), another by an environmental NGO together with a circular textile services foundation (CCT) and the third by a waste compliance consultancy company (Landbell-ERP not among the respondents). In

Hungary, the state organized PRO Mohu is active. In Latvia three PROs are active (Hungarian and Latvian PROs are not among the respondents).

3.2 RESPONDENT PRO PROFILES

The 25 subjects that responded to the survey include 15 PROs, 7 business associations and 1 textile waste management company operating in 3 countries with different legal entities.

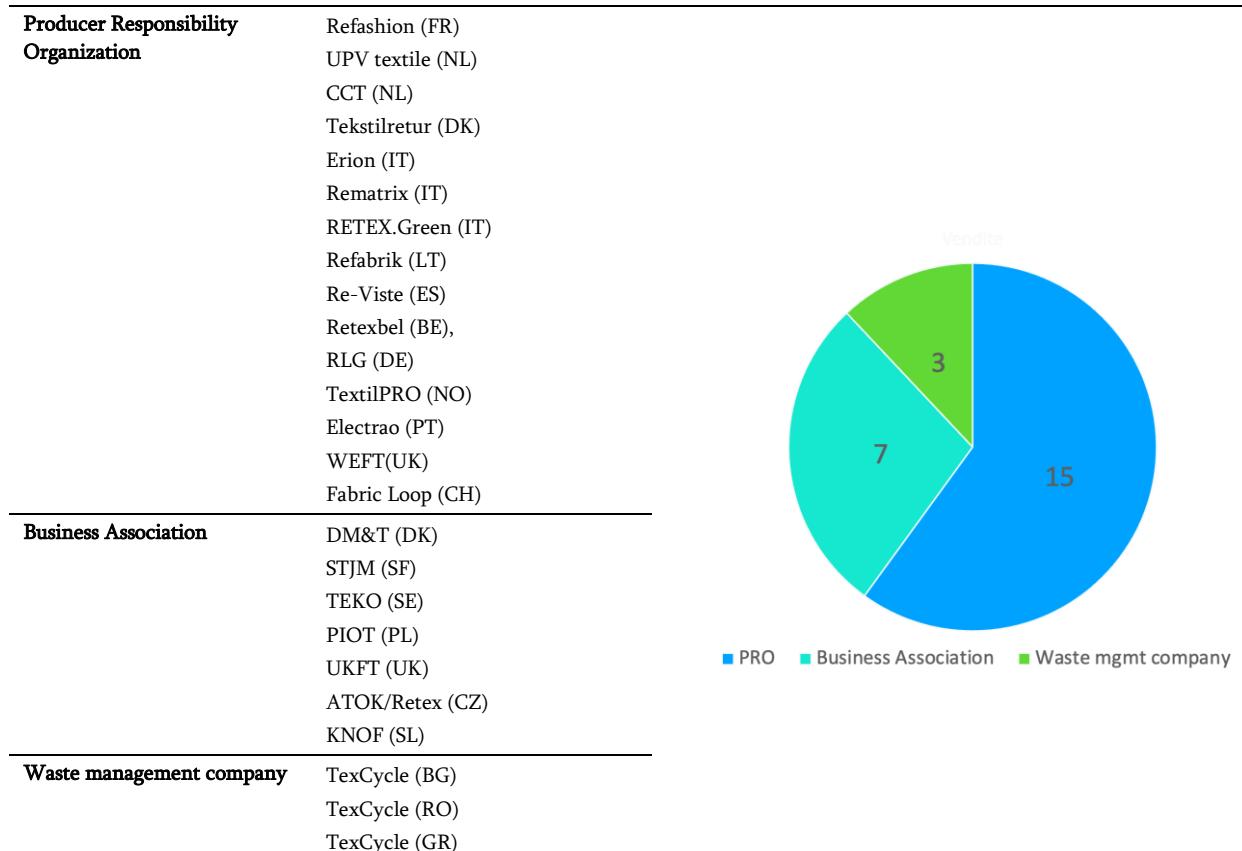


Fig.2 – business profiles of the respondents.

Looking into more depth on the initiators of the established or in development PRO's it can be concluded that most of them are initiatives by or in cooperation with textile business associations

3.3 DEVELOPMENT STATUS AS PRO

Of the 25 respondents, 24 indicated the status of development as textile PRO in their country.

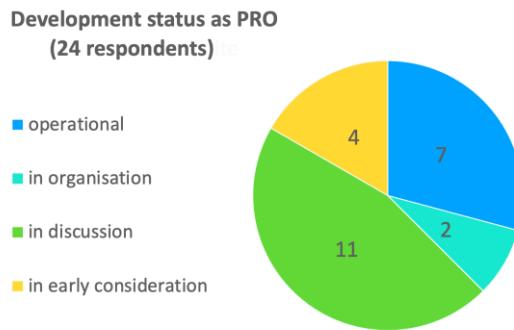


Fig. 3. Development status as textile PRO

In all 20 respondent's countries the establishment of textile PRO is at least in consideration.

Nearly one third of the respondents (7 out of 24) indicate to be operational as PRO while 2 indicate as in organization. Of the 7 operational PROs, 3 operate in countries where EPR is in force. In total in 5 countries (France, Netherlands, Italy, Lithuania, Spain) PROs are operational or in advanced process of organization.

The respondents that indicate to be in discussion or early consideration (15) represent a mix of profiles including business associations (5), PRO-initiatives (5), one NGO and one waste management company (in 3 countries). In Denmark and Czech Republic the business association co-operates with an existing PRO active in other product sectors to expand their coverage to textiles (and footwear).

Focusing on the operational PROs, it is worth noting that UPV-textiel, RETEX.Green and Re-Viste have been initiated and work closely together with the sector business association(s),

Among the two PROs in organization, Retexbel is coordinated by sector business associations.

Overall, 4 PROs have been initiated by sector business associations and 5 are in discussion/consideration with a sector association involved. Aggregated, the leadership or involvement of sectorial associations represents a minority of the PRO developments ongoing (9 out of 24).

3.4 BUSINESS MODEL AS TEXTILE PRO

18 respondents indicated the business model that has been or will be adopted as textile PRO, the other 7 did not indicate the model, 1 respondent indicated two models rather than a single one.

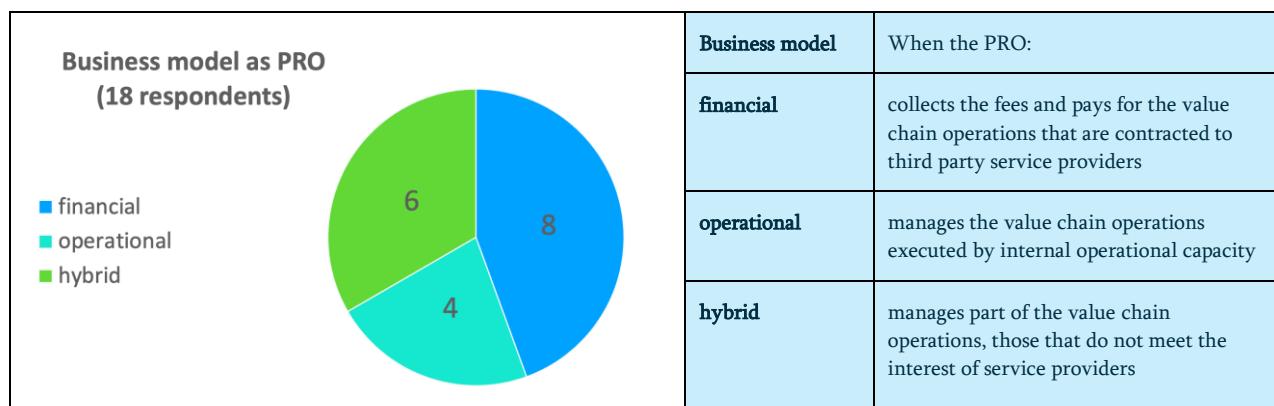


Fig.4 - Business model as textile PRO

The picture of business models is quite diversified. The financial model is adopted by 8 of 18 respondents. The full operational model is the less adopted (4 respondents). The hybrid model, where the PRO operates a mixed approach playing a subsidiary role for those operations that do not meet the interest of the market operators, is adopted by 6 respondents.

Further inventory of the individual reasons for choosing a specific model is required to get more detailed insight and conclude on recommendations.

Profile of members / associates to PROs

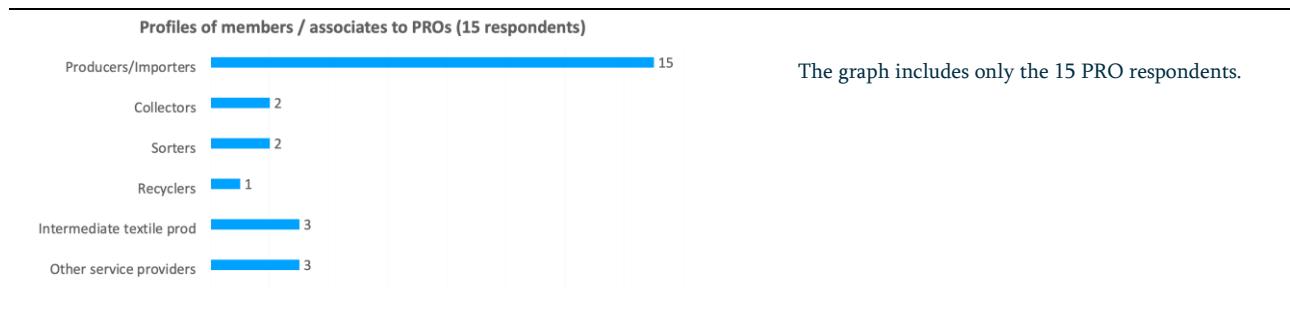


Fig.5 - Profile of members / associates to PRO

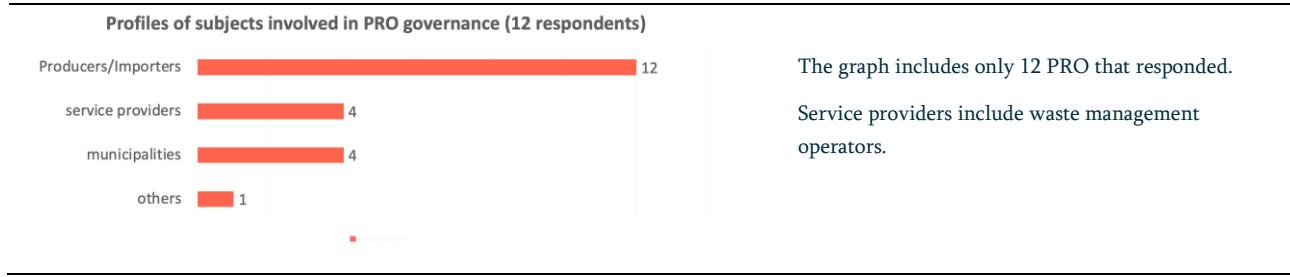


Fig.6 - Profile of subjects involved in PRO governance

The obvious picture is that producers/importers (EPR-liable textile and footwear companies) are indicated as members of PROs and/or involved in their governance.

However, also other subjects are reported as members and/or part of the governance, thus indicating a quite diversified approach to the membership and governance of PROs across countries and/or different PROs in the same country.

Regarding membership, 10 respondents indicate that is restricted to producers/importers, while 5 indicate that also other entities are or can be member or associate.

Regarding governance the picture is more varied, 6 respondents indicate that is restricted to producers / importers, while 6 indicate the engagement of other subjects.

3.5 EPR STATUS

Expected date for entry in force

2025	2026	2027	2028
Lithuania	Italy Romania	Spain Belgium Poland	Denmark Finland
Bulgaria, Portugal, Sweden, Germany, Czech Republic			

In the majority of countries, the expected date for EPR entry in force is aligned with the timeline for the national transposition of the Revised WFD (... Member States shall bring into force the laws, regulations and administrative provisions necessary to comply with this Directive by 17 June 2027 at the latest).

Products in scope

As expected, the products in scope reported by the respondents correspond to those indicated in the Revised WFD. In two countries the products in scope include additional categories as follows:

- NETHERLANDS and ITALY: protective workwear.

Clearinghouse

Definition	<p>In EPR schemes, a clearinghouse is a central, third-party body that manages and coordinates the system for producers, collecting fees, tracking waste data, ensuring compliance, and organizing the collection, sorting, and recycling of end-of-life products or packaging to meet regulatory targets, essentially acting as an administrator for producers' collective obligations.</p> <p>According to the OECD¹ <i>"In jurisdictions where there are competing PROs seeking to fulfil EPR targets, a neutral coordinating entity is needed to make sure that collection is provided everywhere it is needed, that cherry picking is avoided, and that there is a level playing field for all competitors. Without such co-ordination, there is the possibility that collection in some regions – especially rural areas where collection routes may be long and quantities of wastes small – may not be provided service because PROs find it overly expensive.</i></p> <p><i>Co-ordination also enhances efficiency by ensuring that competing PROs do not provide duplicative coverage, collecting end-of-life wastes from the same service area or collection points. Clearinghouses, often a separate non-profit organisation, but sometimes a government agency, thus help rectify undesirable incentives generated by competition among PROs. Clearinghouses can also collect data from producers or service providers, and provide a mechanism for managing proprietary data or identification of free riders".</i></p>
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In four countries a clearinghouse is foreseen including Italy, Denmark, Spain, Germany. A clearinghouse is not foreseen in all countries where multiple PROs are present (e.g. the Netherlands).

Eco-modulation

Eco-modulation, that is part of the provisions in the Revised WFD, is already active in France, and foreseen or in early elaboration in four more countries (Netherlands, Italy, Lithuania, Spain).

¹ OECD EPR Updated guidance for efficient waste management

3.6 EPR READINESS

The respondents were asked to indicate the volumes of the products in scope collected in their countries, making reference to 2024 as the baseline year, as well as the volumes planned to be collected by 2030 and the processing capacity for textile waste that is available.

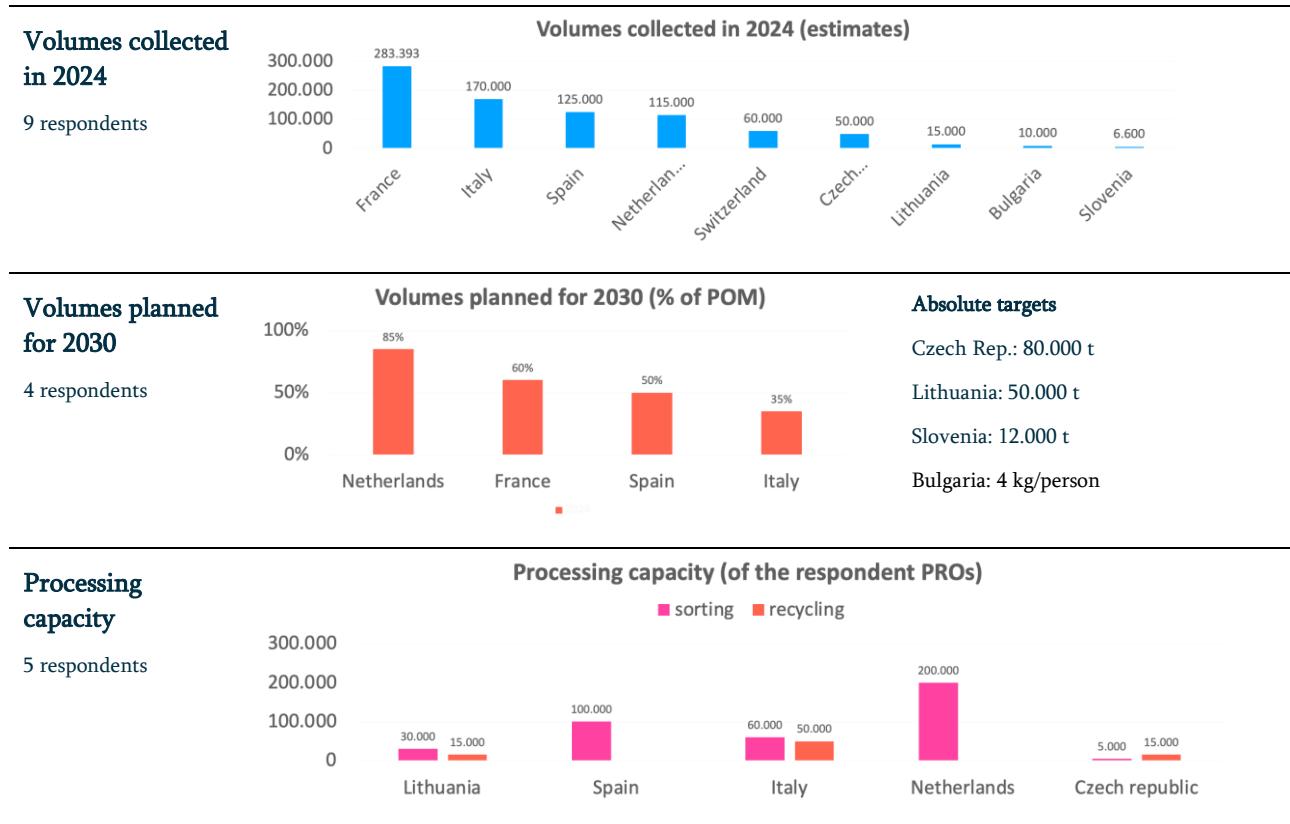


Fig.7 – Volumes collected and planned, processing capacity

Data on the volumes collected are largely missing, apart from France, where they are regularly monitored as part of the EPR implementation. Anyway, the volumes collected are quite limited throughout Europe.

Data on the volumes planned are incomplete and inconsistent: in France and the Netherlands the volumes correspond to official legal requirements²; in Italy they correspond to national targets indicated in the draft Decree on EPR, in other countries data represent non-binding targets.

Data on the processing capacity are limited and quite inconsistent across countries: in The Netherlands they correspond to the national capacity, in other countries they represent the capacity of the respondent.

Analysis

There is dramatic lack of data related to the volumes collected and to the processing capacity in most of the European countries. These data are key to support decision making at governmental level, to support policy making and setting of national targets, as well as at PRO level, to support planning and investment strategies.

² In The Netherlands separate collection is a requirement, not a quantitative target, to achieve the target of 75% re-use and recycling together (2030). It is anticipated that in order to achieve that target, at least 85% has to be separately collected.

It is therefore necessary to map the volumes collected and the installed capacities for collection, sorting and recycling in each country to reconstruct a validated picture. If this picture were not available before the establishment of EPR schemes in Member States, there would be risks to the feasibility of implementing some target-setting related provisions of the Revised WFD such as:

(53) *“The granularity of the information on post-consumer municipal textiles management at Union level should be improved to monitor more effectively the re-use of products, including the re-use and preparing for re-use of textiles, including with a view to potentially setting performance targets in the future.” and*

(59) *“(...) given the present lack of robust data on waste textile, textile-related and footwear products and on the financing of the related extended producer responsibility schemes to be set up by Member States, the Commission should assess first the possibility of setting waste prevention, collection, preparing for re-use, and recycling targets, (...)”*

(41a) states that through a review by 31 December 2029, the Commission shall assess “(b) the possibility of setting waste prevention, collection, preparing for re-use, and recycling targets for waste textile”.

3.7 ALLOCATION OF TASKS IN EPR

Governance functions and subjects

The respondents were asked to indicate the allocation of governance functions in the EPR implementation in their countries according to a taxonomy defined in the OECD STUDY “Extended producer responsibility: updated guidance for efficient waste management” (2016).

The respondents were asked to qualify the engagement of each stakeholder category in a given function as ‘L’ (leading that function) or just ‘P’ (participating to it) or to leave blank in case of minimal/null participation.

Data were provided by 17 respondents on all functions except ‘enforcement’ (only 13 answers).

Table 1 summarises the number of mentions by the respondents for each stakeholder and function. The number indicates the sum of mentions (L+P). Cells marked in blue indicate the entity that received more mentions as L.

Governance function	Government	PROs	Clearinghouse	Waste companies	Municipalities	Specialised ext. entities
Policy formulation & evaluation	17	10	4	8	11	2
Operations	2	14	5	15	15	6
Stakeholder consultation	15	14	2	15	14	8
Registration of producers	8	11	2	1	-	-
Accreditation of PROs	16	5	2	-	1	-
Collection & disbursement of EPR fees	2	16	3	7	5	2
Coordination	5	13	5	4	7	2
Monitoring	15	12	5	4	4	2
Enforcement	13	8	3	1	4	-

Table 1 – Allocation of EPR tasks among stakeholders

Analysis

There is clear alignment among the respondents on Government to take the lead of **policy formulation, accreditation of PROs and enforcement**.

There is clear alignment on the PROs to take the lead of **collection and disbursement of EPR fees and coordination**.

Leadership of **operations** is not aligned among the respondents, being assigned in close proportions to PROs, (8 mentions) Waste companies (7) and Municipalities (7).

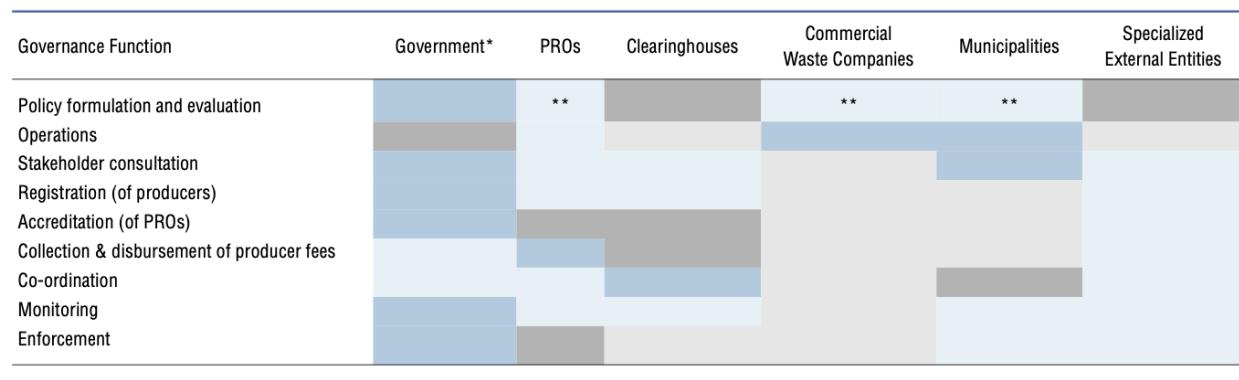
There is clear alignment on Government to lead **stakeholder consultation** with significant engagement of PROs, Waste companies and Municipalities.

Leadership of **registration of producers** is not aligned, being assigned to PROs (11 mentions) and to the Government (6). Since in the WFD this function is assigned to the government, these apparently diverging positions are likely due to the interpretation that PROs have to register their members.

Leadership of **monitoring** is not aligned among respondents, being assigned to Government (9 mentions) and to PROs (8). This misalignment needs to be clarified in the project in view of harmonisation (this assignment is not detailed in art.22a of the WFD).

Comparison with the OECD study

Comparing the results of this survey to the OECD study, significant alignment arises on whom to allocate the functions of **policy formulation, accreditation of PROs, collection/disbursement of EPR fees and enforcement**.



* Government refers to public sector entities involved in policy formulation and oversight. Does not include local governments solely involved in service delivery.

** Governments take the lead in policy formulation, but key stakeholders are often involved.

***Municipalities have ongoing interaction with citizens even when they don't have a central role in stakeholder consultation processes.

Table 2 – Typical allocation of governance tasks in EPR Systems (OECD)

Regarding **operations** the respondents indicate a mixed/mutual leadership of PROs, Waste companies and Municipalities where the OECD did not assign the task to PROs. This misalignment could be interpreted by considering that the majority of the respondents to the survey adopt operational or hybrid business models where they directly manage all or part of the operations.

Regarding **stakeholder consultation**, the picture that emerges from the survey (Government to lead with significant engagement of PROs, Waste companies and Municipalities) is similar to OECD that indicates Municipalities as co-

leaders. It is worth mentioning that the textile business associations are important stakeholder that should be considered to be involved in the performance of the function.

Regarding the **registration of producers** there is some misalignment between this survey and the OECD study. According to the Revised WFD art.22b this is a function of the Government, while the respondents of this survey indicate that this function is assigned also to PROs. As anticipated, this misalignment can be interpreted by considering that the official registration as textile producer should be done at any Member State where that producer is active. Moreover, Art.22c(1) states that “producers ... entrust a PRO.. to fulfil their EPR obligations..” implying that also a registration as a member of the PRO is required. This dual-level registration (country and PRO) is a key topic towards harmonisation of EPR to minimize the administrative burden for companies through the one-stop-shop registration concept.

Regarding **coordination**, the respondents indicate a preferred allocation of the leading role to PROs (with engagement also of municipalities, government, clearinghouse and waste companies) whereas the OECD assigns leadership to the clearinghouse. This apparent misalignment possibly originates from a different interpretation of the function where the respondents intended general EPR system coordination while the OECD focused on the coordination of multiple PROs where applicable.

Regarding **Monitoring** there is not full alignment between the OECD study and this survey that allocates the lead not only to Government, but also to PROs. The differences in the interpretation of monitoring and different levels of monitoring are worth deepening, considering that art.22a(6) of the Revised WFD states that “member states shall clearly define the roles and responsibilities of relevant actors involved in the implementation, monitoring and verification of the EPR scheme ...”.

3.8 MARKET FAILURES

The respondents were asked to indicate, from a pre-defined list, which operations of the value chain need economic support from the EPR.

Value chain operations that need economic support

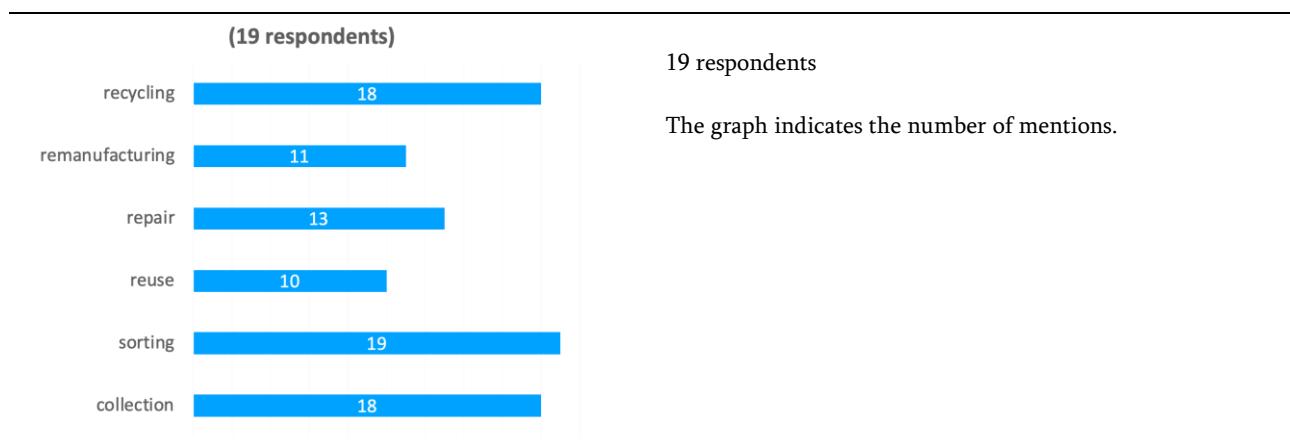


Fig.8 – Value chain operations that need economic support from the EPR

Analysis

A solid consensus is reported on the need to support recycling and sorting as well as collection. A smaller number of respondents considers repair and remanufacturing also in need of financial support. There is less consensus on the need to support reuse, the main motivation being the decline of profits.

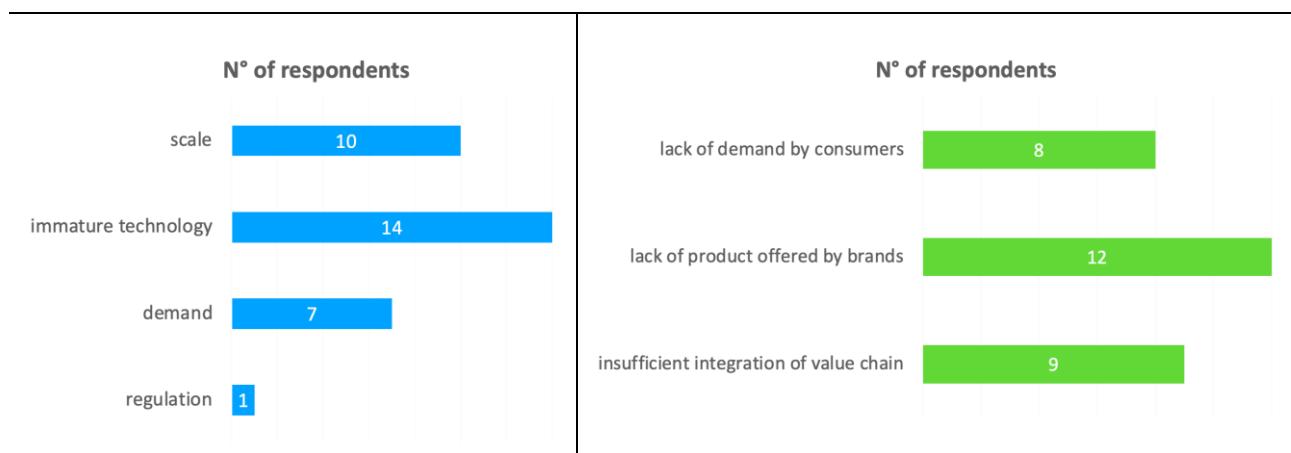
Additional comments expressed by the respondents

Activity	Motivations / comments on the need for economic support
collection	<ul style="list-style-type: none"> • to pay costs currently incurred by the sorter / unprofitable • to boost current insufficient volumes • to ensure an organised and efficient system • to support ramping up until necessary • to finance unprofitable activities (e.g. in remote areas)
sorting	<ul style="list-style-type: none"> • to pay costs to sort for recycling especially for fiber-to-fiber • to ensure an organised and efficient system • to support ramping up until necessary • to support social activities of NGOs • to contrast export of Secondary Raw Materials • to support current unprofitable business case of sorting for reuse
reuse	<ul style="list-style-type: none"> • to introduce regulation and specifications in the market • to support a business model no more profitable • to reshape the market towards local reuse • to promote better sorting and avoid reselling at below real market value
repair	<ul style="list-style-type: none"> • to promote and scale up an underdeveloped market • to secure available and accessible services to consumers • to pay costs of an expensive activity • out of scope of EPR
remanufacturing	<ul style="list-style-type: none"> • to promote and scale up a non-existing market • out of scope of EPR
recycling	<ul style="list-style-type: none"> • to promote and scale up a currently marginal market • to support R&D and maturation of technologies • to pay costs needed to fully valorise SRM • to develop processing capacity (CAPEX) • to compensate the extra costs of recycled fibres vs virgin • to reward processes with better environmental footprint

The respondents were asked to indicate whether market failures depend on scale or immature technology and to deepen the causes of the insufficient scale.

Scale or immature technology?

Causes of insufficient scale



Additional comments expressed by respondents

- recycling needs to be profitable / only R&D has to be supported by EPR

- all value chain activities need to be supported
- the recycling market is marginal
- valorisation of SRM is a cost intensive activity (CAPEX and OPEX)
- there is lack of capacity in the EU
- competitiveness vs virgin fibres is not sustainable at the moment
- severe regulations on chemicals can further increase costs / reduce availability
- only processes with better environmental footprint should be supported

Fig.9 – Causes of market failures

Analysis

The opinions on the causes of market failures show a clear preference towards immaturity of the enabling technologies, followed by scale and lack of demand.

Deepening the causes of insufficient scale, the preference is for the non-obvious lack of offer by the brands, followed by insufficient integration of the value chain and lack of demand by the consumers.

Each of these causes shed light on different aspects of the current scenario and are addressed by different policy measures as follows:

- lack of product offer could be rather expressed as ‘more can be done with what is feasible today’ and ESPR is the main policy instrument to drive in this direction, supported by eco-modulation;
- insufficient integration of the value chain (an inherent characteristic of an infant market) calls for collaborative initiatives to reduce fragmentation and support scale up such as the studies made in this project and in other EU-level initiatives including the PRO Forum and ReHubs Europe
- lack of demand by consumers is mostly related to their orientation towards price and convenience rather than to sustainability and ESPR / DPP are the main policy instrument to change these habits, supported by the awareness campaigns that will be funded by the EPR.

Quite varied positions have been expressed on the opportunity to support the competitiveness of recycled materials against virgin, not only in terms of levelling variable costs (OPEX), but also in terms of supporting investments in the creation of new capacity (CAPEX).

3.9 REBOUND EFFECTS

The respondents were asked to indicate which rebound effects they envisage in their countries and related mitigation actions.

In the following the positions of the respondents are reported as expressed to be offered as input for the specific study that will be carried out in Task 3.5.

Effects / issues reported

- a) more landfilling in the short to medium term due to lack of processing capacity and demand
- b) increased collection leads to lowering value with impact on the critical business case of collectors and sorters
- c) erosion of profit due to free riders (to some extent inevitable) in addition to a declining reuse market

- d) social acceptance of the waste management of textiles does not tackle overconsumption
- e) not well-balanced eco-modulation does not promote eco-design
- f) disproportioned / unfair burden on producers to pay the costs of free riders
- g) takeback campaigns associated to rewards could drive overconsumption
- h) excess obligation poses risks to the industrial system in the EU / stepwise approach needed
- i) too much focus on collecting and sorting with additional costs for PROs

Other free comments

- j) need for demand side measures
- k) financial support: public co-investment, fiscal compensation and careful legal targets for the use of recycled content
- l) insufficient focus (capital) on the longer-term developments on higher-level re-use and fiber-to-fiber recycling
- m) increased cost due to fees for shoppers / use these funds to support repair

Preliminary comments on the mentioned rebound effects

- a) is more related to the lack of capacity in the EU than to the EPR itself
- b) is related to the take-up of recycling as additional valorisation route in the EPR implementation
- c) is more related to enforcement at EU level than to the EPR itself
- d) is more related to other policy measures including the ESPR
- e) call for coordination / synergy between the EPR and the ESPR
- f) similar comment as c)
- g) similar comment as d)
- h) call for stepwise implementation of a circular system, similar comment as a)
- i) call for proportionate impact-based criteria for attributing the financial resources of the eco-fees.

4. ANNEXES

4.1 ANNEX 1 - ONLINE REFERENCES FOR THE EPR IN FORCE

France	https://www.legifrance.gouv.fr/jorf/id/JORFTEXT000046600083
Netherlands	https://www.afvalcirculair.nl/uitgebreide-producentenverantwoordelijkheid-upv/overzicht-upv/upv-textiel/

4.2 ANNEX 2 - RELEVANT NATIONAL POLICIES

List of references

Italy	Schema di decreto per l'istituzione del regime di responsabilità estesa del produttore per la filiera dei prodotti tessili di abbigliamento, calzature, accessori, pelletteria e tessili per la casa
Bulgaria	<p>"https://www.strategy.bg/PublicConsultations/View.aspx?@lang=bg-BG&Id=6972</p> <p>https://strategy.bg/PublicConsultations/View.aspx?lang=bg-BG&Id=9087</p> <p>https://www.parliament.bg/bg/bills/ID/166497</p> <p>https://lex.bg/laws/ldoc/2135802037 - Amendments from 2021"</p>
France	"Decree setting legal framework regarding Textile EPR currently under review by public authorities – Target date for actual implementation of new Textile EPR system: 01/01/26
Denmark	<p>Legislation on collection of textile waste (Affaldsbekendtgørelsen)</p> <p>Additional piece of legislation on the reduction of "fast fashion" products consumption under review by both chambers of French Parliament (National Assembly and Senate) – Target date for final vote: Q4 2026 "</p> <p>National strategy for textiles + preparations & negotiations started for EPR for textiles</p>
Portugal	it is expected to be part of UNILEX – 152-D/2017
Finland	Circular Economy Act (replaces the existing Waste Act).
Belgium	Transposition of WFD in preparation at regional government level
Lithuania	the Ministry of Environment of the Republic of Lithuania is preparing legal acts related to the establishment of extended responsibility for manufacturers and importers of textile products, as well as the creation of licensing requirements for producer-importer organizations.
Romania	<p>"https://dezvoltaredurabila.gov.ro/public/uploads/files/planul_naional_de_aciune_privind_economia_circulara.pdf (Page 130-131 -OS 31)</p> <p>https://mmediu.ro/domenii/mediu/evaluare-impact/evaluare-de-mediul-pentru-strategii-planuri-programme/pngd/pngd-revizuit/?download=35825 (page 124 – (6))</p>

Spain	1/ Ley 7/2022, de 8 de abril, de residuos y suelos contaminados para una economía circular. (Law 7/2022, of 8 April, on Waste and Contaminated Soils for a Circular Economy). 2/ Proyecto de Real Decreto por el que se regulan los productos textiles y de calzado y la gestión de sus residuos (Draft Royal Decree on the regulation of textile and footwear products and the management of their waste")
Netherlands	National policy strategy for circular textiles 2025-2030 https://www.rijksoverheid.nl/documenten/rapporten/2024/12/04/bijlage-5-beleidsprogramma-circulair-textiel-2025-2030-definitieve-opgemaakte-versie
Sweden	responsible authority currently investigate possible solutions for a Swedish EPR – to be presented October 2026
Czech Republic	Setting up the EPR system for textiles in the Czech Republic in 2027/2028. Date of establishment of PRO 2026/2027
Poland	1) Regulations and obligations already in practice / implemented from 2025. Obligation to separate textile collection from January 1, 2025 – in accordance with EU requirements, municipalities are to organize the collection of used clothing and textiles (PSZOKs and other collection points). This step implements some of the requirements regarding textile waste management. 2) Legal framework in the country (legal acts applicable to EPR/textiles). Act of December 14, 2012 – Waste Act (framework of waste law in Poland). It contains general rules regarding waste management and the obligations of municipalities and businesses.. Act of June 13, 2013 on the management of packaging and packaging waste – applies to EPR systems for packaging; a thorough reform of this area is currently being planned, which may also impact the more widely used EPR mechanisms. 3) Legislative work / projects and preparations (important for EPR for textiles). The draft Act on Packaging and Packaging Waste (project number: UC100) is a major reform of the EPR system in Poland (state model / new financing rules, ecomodulation, fees). The draft was published by the Ministry of Climate and Environment / Government Legislation Center (August 2025). Although it directly concerns packaging, it is part of broader work on the EPR system and signals the direction of changes in the implementation of EPR in other sectors (including textiles). Public discussions and analyses regarding the implementation of EPR for textiles - the Ministry of Climate and industry/legal studies are discussing the introduction of obligations for textile producers (covering the costs of collection/sorting/recycling). Many stakeholders are submitting comments on the drafts. 4) National Strategic Documents. National Waste Management Plan (NWMP) 2028 — a planning document that includes actions in the area of textile waste and the modernization of the waste management system. It is important for the implementation policy of the EPR. 5) Connection with EU Regulations and Implications for Poland. New/revised EU regulations on waste and textiles (EP resolutions in September 2025 and related acts) require Member States to introduce EPR systems for textiles (implementation deadlines, e.g., 30 months from the act's entry into force). This is the main reason why Poland is accelerating legislative work"

4.3 ANNEX 3 – REVISED WFD

Article 22c

Producer responsibility organisations for textiles

1. Member States shall ensure that producers of textile, textile-related or footwear products listed in Annex IVc entrust a producer responsibility organisation to fulfil their extended producer responsibility obligations laid down in Article 22a on their behalf.
2. Member States shall require producer responsibility organisations intending to fulfil the extended producer responsibility obligations on behalf of producers in accordance with Article 8a(3), Articles 22a, 22b and 22d and this Article to obtain an authorisation from a competent authority.
3. Member States shall lay down criteria regarding the qualifications that producer responsibility organisations need to have in order to be entrusted to fulfil extended producer responsibility obligations on behalf of producers. In particular, Member States shall require the producer responsibility organisations to demonstrate the necessary expertise in waste management and sustainability.
4. Member States may derogate from the obligation in paragraph 3, provided that by 16 October 2025 they have already laid down criteria ensuring that a producer responsibility organisation may be entrusted to fulfil extended producer responsibility obligations on behalf of producers only where it shows its expertise in the field of waste management and those criteria ensure that the producer responsibility organisation will manage the waste in a sustainable manner and limit the impact of waste management on the environment.
5. Without prejudice to Article 8a(4), Member States shall require producer responsibility organisations to ensure that the financial contributions paid to them by producers of textile, textile-related or footwear products listed in Annex IVc.

4.4 ANNEX 4 - QUESTIONNAIRE

Survey on the EPR scheme for textiles and PRO



Funded by the
European Union
GA - 101181704

Introduction

This survey is carried out in the context of the Circula-Tex project funded by the European Commission in the call HORIZON-CL6-2024-CircBio-01-2.

The **main objective of Circula-Tex** is to support the EU Strategy for Sustainable and Circular Textiles aimed at redesigning textile value chains towards a circular model. In particular, the project will develop knowledge base and evidence to support harmonised implementation of Extended Producer Responsibility schemes across the EU. Circula-Tex project will identify gaps in the sector, evaluate the effectiveness of EPR schemes, and develop recommendations for improving recycling and reuse through eco-design and enhanced material identification. An innovative labelling system in line with the Digital Product Passport, will be developed.

Aim of this survey is to collect relevant information to reconstruct the EPR and PRO landscape in the EU in order to define priorities, guidelines and best practices to promote harmonisation.

This survey will be sent to Producer Responsibility Organisations in different Member States, both established and under construction by initiating textile sector associations or other business or initiatives.

It is expected that the responses to the questions in the survey will vary depending on the maturity of the EPR scheme and PRO organisation in each country.

The responses will not be associated to the names of the respondent subject, but only to its country as part of the detailed mapping of the landscape across Europe.

At the end of the survey there is a section where free comments can be added, you are invited to contribute as any comment could be very valuable for the project.

Instructions

In the following survey, please edit only the cells in white. For what concerns quantitative data please refer to year 2024, if feasible, or indicate the reference year for any other case.

**Survey on the EPR scheme for textiles and PRO**

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Section 1 – Your profile

Country	
---------	--

Organisation name (*)	
-----------------------	--

Respondent name (**)	
----------------------	--

Position in the organisation (**)	
-----------------------------------	--

Legal status (e.g. consortium)	
--------------------------------	--

(*) please indicate if not to be disclosed

(**) not to be disclosed

Section 2 – Your Country

Q1. Is EPR legislation in force? YES /NO	
--	--

Q2. In case it is IN FORCE, indicate	
• the date of entry into force	
• the official legal document	
• the link to the online information available	

Q3. In case it is NOT IN FORCE, indicate the planned / expected year for entry into force	
---	--

Q4. List the products (expected to be) in scope for the EPR	
---	--

Q5. Indicate the weight collected nationwide for the products in scope in 2024	
--	--

Q6. Indicate the target volumes to be collected (set / under discussion in your country)	
• by 2026 (in tons per year and/or in % of the put on the market)	
• by 2030 (in tons per year and/or in % of the put on the market)	

**Survey on the EPR scheme for textiles and PRO**

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Q7. Indicate national policies / legislation existing or in preparation relevant to the EPR for textiles

Q8. Indicate the national Ministry / multiple Ministries responsible for the EPR

Q9. Indicate how many PROs are present or planned to be established in your country

Q10. In case of multiple PROs indicate if there is a clearinghouse/coordinating entity and describe its functions


Survey on the EPR scheme for textiles and PRO


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Allocation of tasks among stakeholders in the EPR system in your country

In the table below, rows indicate functions in the EPR system, columns the main stakeholder categories.

Put **L** when the category is **Leading** that function, **P** when is **Participating**, **leave blank** if participation is **null/minimal**.

Governance function	Government	PROs	Clearinghouse	Waste companies (*)	Municipalities	Specialised external entities
Policy formulation and evaluation						
Operations (**)						
Stakeholder consultation						
Registration of producers						
Accreditation of PROs						
Collection & disbursement of EPR fees						
Coordination						
Monitoring						
Enforcement						

(*) Waste companies include commercial actors and social enterprises.

(**) Operations include collection, sorting (for second-hand reuse, trading and recycling), recycling.



Section 3 – Your organisation

Q11. Describe your business profile (mark with X)	
<ul style="list-style-type: none"> • Producer Responsibility Organisation • Business Association • NGO • Authority • Other (please describe) 	

Q12. Indicate the link to your organisation's website	
---	--

Q13. Indicate the business profile of your members/associates (mark with X, multiple choices possible)	
<ul style="list-style-type: none"> • Producers/Importers (brands or retailers that introduce new products on the market) • Collectors • Sorters • Recyclers • Intermediate textile producers (yarns, fabrics, nonwoven) • Other service providers (indicate the type) 	

Q14. What is the development status as PRO (mark one with 'X')	
<ul style="list-style-type: none"> • operational • in organisational development • in discussion with government and/or stakeholders • in early consideration (internally) 	

Q15. Indicate the year when your activity as PRO started / is planned to start	
--	--

Q16. Indicate if your PRO is (planned to be) for profit or not YES / NO	
---	--

Q17. Indicate the profile of subjects (to be) involved in the governance of your PRO (multiple 'Xs')	
<ul style="list-style-type: none"> • Producers/Importers (brands or retailers that introduce new products on the market) • Service providers (collectors, sorters, recyclers, other services) • Municipalities and other public entities • Others 	
Explanatory comments:	



Q18. Describe the (expected) governance structure of your PRO (board members, stakeholders involvement)

Q19. Indicate the (expected) business model of your producer responsibility organisation (PRO)

- financial
- operational
- hybrid

Explanatory comments:

Section 3a – Your business (section for operational PROs only, if you are not continue with Section 4)

Q20. Indicate the financial turnover of your PRO (in million Euros)

Q21. Indicate the expenditure categories and amounts (in million Euros)

Q22. Describe the structure of the eco-fee (amount, differentiation with products)

Q23. Indicate if you (plan to) implement eco-modulation YES/NO

Q24. In case YES, please describe the structure of eco-modulation

Q25. Indicate the total market share of your members vs the total weight in scope put on your national market

Q26. Indicate whether you cover ONLY SOME subcategories of the products in scope in your country



Q27. Indicate whether you cover also product categories NOT in scope of the EPR (e.g. protective workwear, carpets, mattresses)

(see <https://data.consilium.europa.eu/doc/document/ST-7258-2025-INIT/en/pdf> page 103 and 104 on scope)

Q28. Indicate the streams of waste that you collect / are responsible for (mark with X, multiple answers)

- residential (arising from household)
- professional (arising from professional / corporate use)
- industrial (arising from industrial operators)

Q29. Indicate the processing capacity in your organisation / country

- Sorting capacity in tonnes per year
- Recycling capacity in tonnes / year

Q30. Indicate the outputs of your activity

- Volume of reusable textile waste after sorting in tonnes per year
- Volume of non-reusable waste after sorting in tonnes per year
- Volume of non reusable and non recyclable waste after sorting in tonnes per year

Q31. Segment the recyclable volumes per destination / utilisation

- used to produce cleaning cloths, wiping rags, felted substrates in tonnes per year
- used to produce spinnable fibres in tonnes per year

Q32. Indicate which solutions you (plan to) implement to trace the materials managed and reported

**Section 4 – Market failures**

Q33. Indicate which step(s) of the extended value chain need economic support from the EPR (the hot spots to be tackled by the EPR) and the main reasons why

• collection	
• sorting	
• reuse	
• repair	
• remanufacturing	
• recycling	

Q34. Comment whether these market failures depend on insufficient scale or on immature technology

Q35. Deepening on scale, comment whether these failures depend on

- a) lack of demand by consumers
- b) lack of products offer / use of recycled fibres by brands and their production chains
- c) insufficient integration of the extended value chain.

If possible, below please substantiate your comments with examples / references / data

Q36. Indicate possible rebound effects that you envisage / experienced in your country and suggest any mitigation actions

Section 5 – Free comments

Feel free to add any other comment you deem it useful to promote circularity in textiles