



Textile EPR in Motion:

Creating Practical Solutions for Circular Textile Flows

Robert Sommer

About us



**Creating Practical Solutions for
Circular Textile Flows**



EPR One-Stop-Shop



Environmental Compliance Management

- Compliance Services
- Representation & Reporting
- Legislative Monitoring & Insights



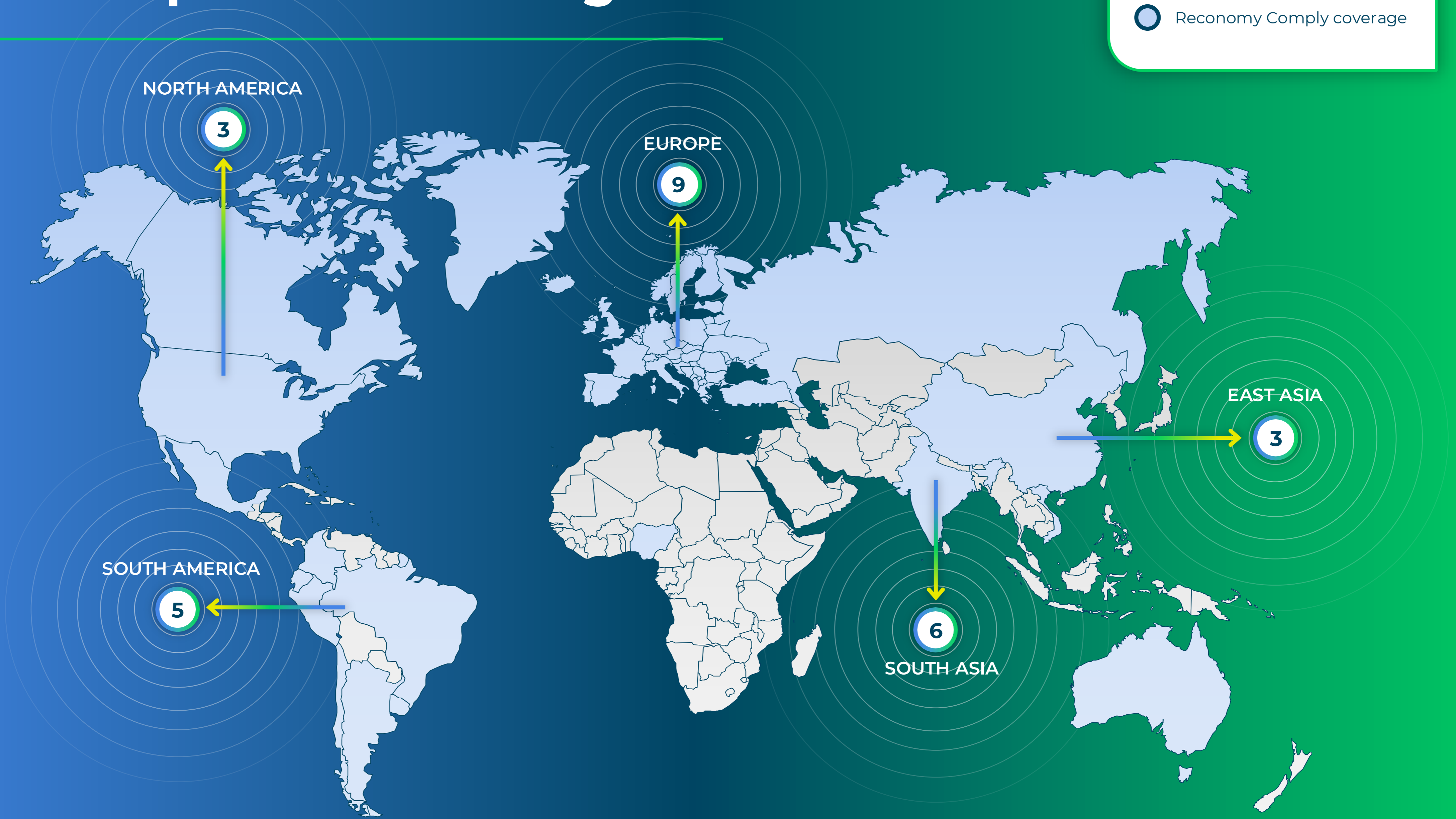
Country & Market-specific PROs

- Consulting
- Operator
- IT Architect / Platform Design

RLG Compliance Coverage

KEY:

- Offices / regional hubs
- Reconomy Comply coverage



40+ PROs globally

WEEE

Germany (2 PROs)	(2007)
Italy (2 PROs)	(2007)
UK	(2007)
Denmark	(2008)
Hungary	(2008)
Romania	(2009)
Poland	(2009)
USA (7 PROs)	(2013)
Mexico	(2014)
Peru*	(2014)
Vietnam	(2015)
Colombia	(2017)
India	(2017)
Canada***	(2021)

Batteries

Germany	(1998)
Italy	(2009)
Denmark	(2008)
Hungary	(2008)
UK	(2009)
Poland	(2009)
Romania	(2010)
Argentina	(2016)
India	(2022)

Packaging

UK	(1997)
Germany	(2003)
Hungary	(2008)
Poland	(2009)
India	(2020)
Canada***	(2021)
Denmark	(2024)

Textiles

Italy	(2024)
Germany	(tbc)
Romania	(tbc)
Poland	(tbc)
Austria	(tbc)
UK	(tbc)

*Peru: additional PRO for tires ***Canada: Common Collection System Operator

Overview

EPR for B2B (Textile Rental Business)



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Exemplary Governance Structure for Textile EPR



Competent Authority

Germany: BMUKN (policy lead)

- Defines the legal framework
- Appoints **enforcement???** authorities
- Establishes EPR requirements and objectives



Enforcement Authority

Germany: Umweltbundesamt (UBA)

- Oversees compliance and enforcement
- Conducts administrative offence proceedings
- Supervises producers, PROs, and collection entities
- May delegate specific public functions to private entities

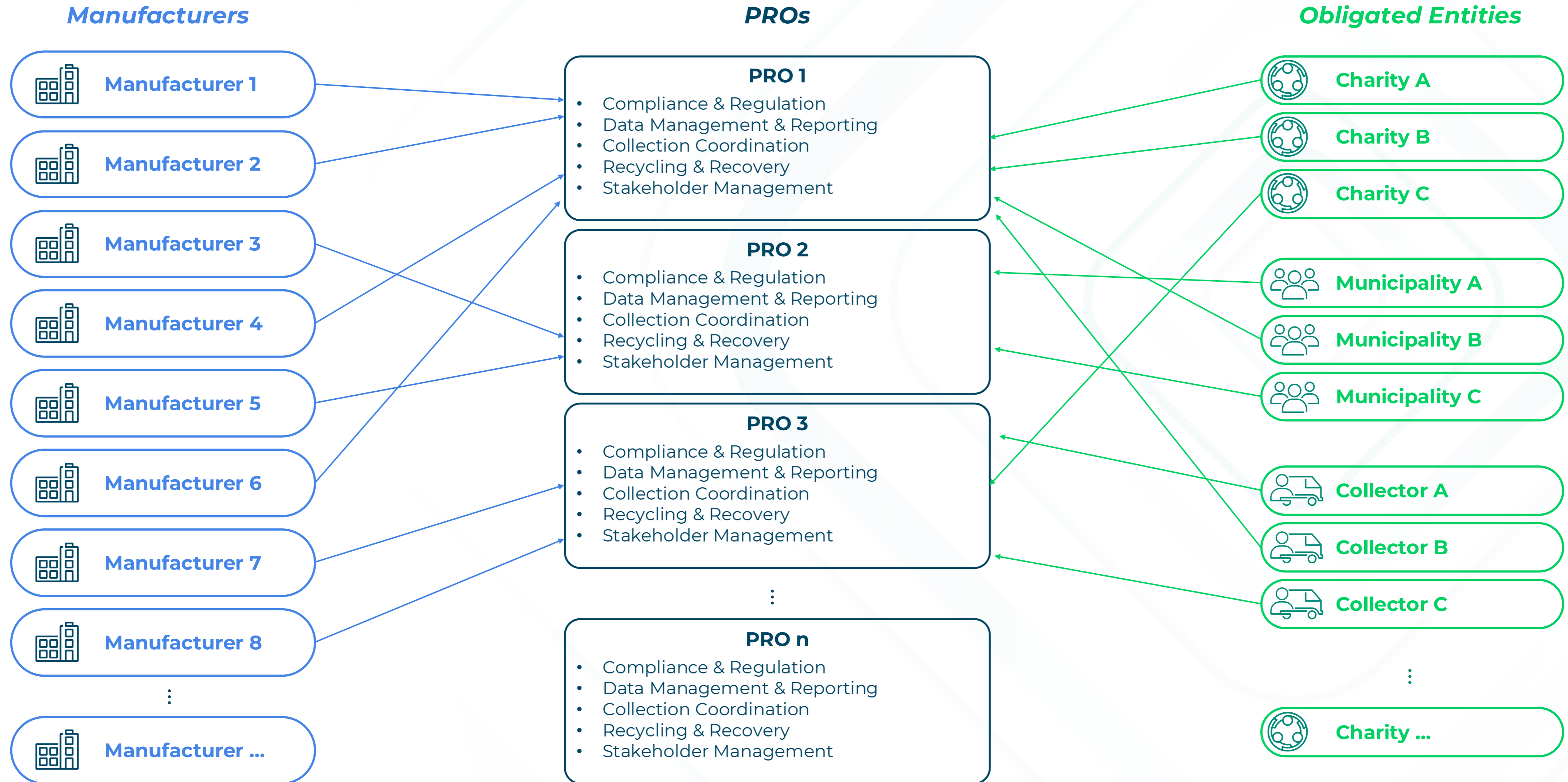


Registration Authority

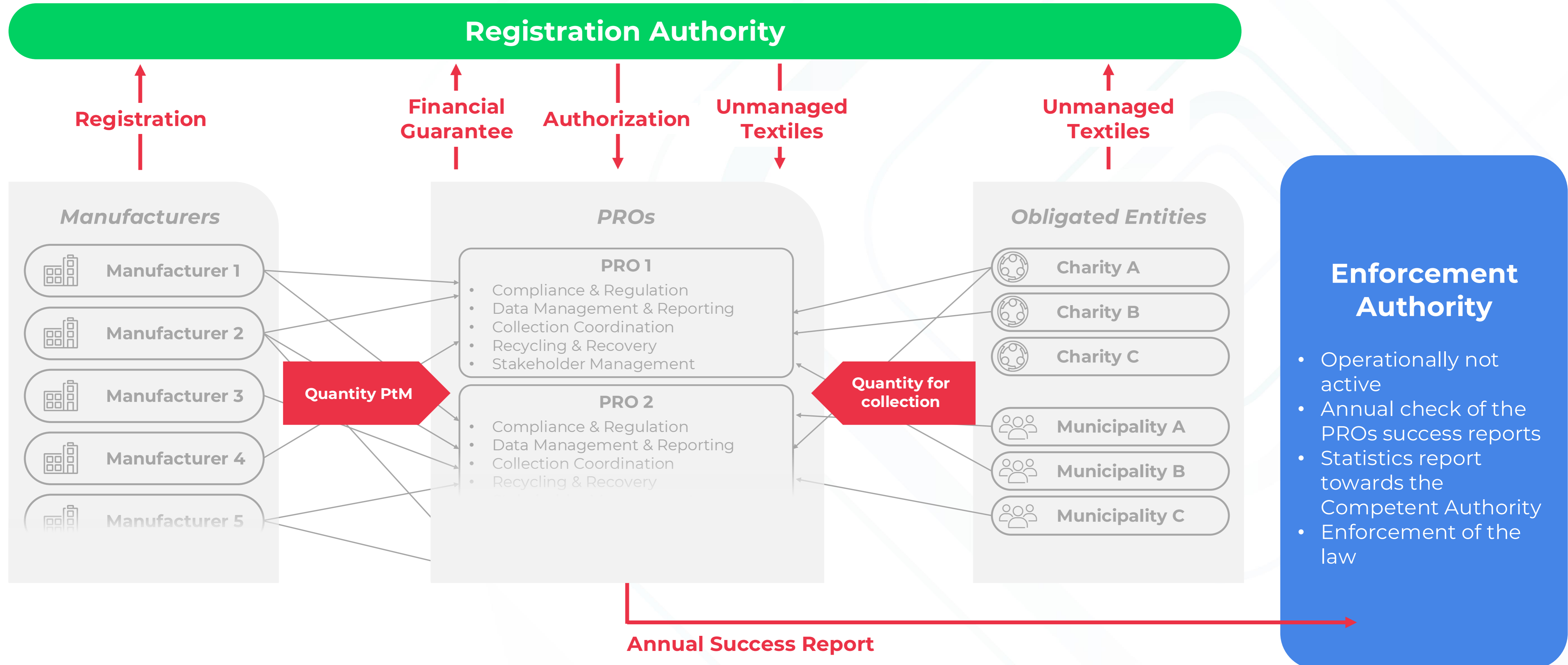
Germany: EAR or producer-led non-profit entity

- Maintains producer register
- Authorizes and supervises PROs
- Allocates unmanaged end-of-life textile volumes
- Manages financial guarantees from producers and/or PROs

EPR Ecosystem



Data Flow in an EPR System



Financial Flow in an EPR System

Registration Authority



Enforcement Authority

- Operationally not active
- Annual check of the PROs success reports
- Statistics report towards the Competent Authority
- Enforcement of the law

Scenario: Manufacturer = Obligated Entity

For manufacturers that also operate as collectors (e.g., in B2B leasing models), a potential drawback is the **timing mismatch** between EPR fee payments and collection reimbursements. While the overall financial impact may be neutral, this delay can create **pressure on liquidity and working capital**.



Registration Authority



Enforcement Authority

- Operationally not active
- Annual check of the PROs success reports
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Scenario: Manufacturer = Obligated Entity

Our idea: Reduce the PtM Fee and give no compensation for the collection.

Advantages: Streamlined EPR obligations for dual-role manufacturers and collectors / Reduced working capital burden / Maintains established circularity models



Registration Authority



Enforcement Authority

- Operationally not active
- Annual check of the PROs success reports
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Thank you!

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