Submission to Department of Climate, Energy and the Environment on the draft National Policy Statement and Roadmap on Circular Textiles

7th July 2025

Zero Waste Alliance Ireland is a member of

EEB European Environmental Bureau

and

IEN Irish Environmental Network

An Tinteán Nua, Ballymanus, Castlepollard, County Westmeath, Ireland
An Tinteán Nua, Baile Mhánais, Baile na gCros, Co. an Iarmhí, Éire, N91 PP76.
Telephone +353 44 966 2222 Mobile +353 86 381 9811
Email admin@zwai.ie

ZERO WASTE ALLIANCE IRELAND

Towards Sustainable Resource Management

Submission to Department of Climate, Energy and the Environment on the draft National Policy Statement and Roadmap on Circular Textiles

7th July 2025

An Tinteán Nua,
Ballymanus,
Castlepollard,
County Westmeath,
Ireland
N91 PP76.

National Policy Statement and Roadmap on
Circular Textiles Consultation,
Circular Economy Materials Management
Division,
Department of the Environment,
Climate and Communications,
Newtown Road,
Wexford,

Y35 AP90.

By email to **CircularEconomyConsultations@decc.gov.ie**

Dear Sir / Madam,

Submission to Department of Climate, Energy and the Environment on the draft National Policy Statement and Roadmap on Circular Textiles

In response to the invitation by the Department of the Environment, Climate and Communications to make submissions, observations and comments on the Draft National Policy Statement and Roadmap on Circular Textiles, we are attaching a submission prepared by and on behalf of Zero Waste Alliance Ireland (ZWAI).

ZWAI welcomes this opportunity to engage in the consultation process and to contribute to shaping a more sustainable, circular approach to textiles in Ireland. While our core mission focuses on the prevention and elimination of waste in all its forms, we recognise that textiles represent a growing and urgent challenge in terms of resource use, environmental impact, and social responsibility.

We therefore regard this public consultation as an important and timely initiative, and we are pleased to offer our insights and recommendations in response to the draft policy and roadmap.

We look forward to receiving your acknowledgement of this submission and to ongoing engagement with the Department on the development and implementation of Ireland's circular textiles strategy.

Yours sincerely,
Orla Coutin Fitzsimons
on behalf of Zero Waste Alliance Ireland

Submission to Department of Climate, Energy and the Environment on the draft National Policy Statement and Roadmap on Circular Textiles

7 July 2025

CONTENTS

Contd.

CONTENTS, CONT.

ZERO WASTE ALLIANCE IRELAND

Towards Sustainable Resource Management

Submission to Department of Climate, Energy and the Environment on the draft National Policy Statement and Roadmap on Circular Textiles

1. INTRODUCTION

Zero Waste Alliance Ireland (ZWAI) welcomes the opportunity to respond to the Draft National Policy Statement & Roadmap on Circular Textiles. ZWAI commends the Department on producing a comprehensive, forward-looking policy framework that acknowledges the scale and complexity of the textiles challenge and recognises the significant role Ireland can play in transitioning toward a circular economy for textiles.

We appreciate the focus on policy coherence, strategic ambition, and a whole-of-government approach. As a national environmental NGO, ZWAI supports the draft's commitment to addressing overconsumption, waste generation, and the environmental impacts of fast fashion, while embedding the principles of reuse, repair, and extended producer responsibility (EPR).

We recognise that delivering a truly circular textile system will require transformative change across the entire value chain — from design and production to consumption, reuse, and end-of-life treatment. Accordingly, we welcome the opportunity to contribute to shaping a policy that not only addresses downstream waste management but also creates the conditions for waste prevention, systemic reuse, and sustainable business models.

In line with the scope of this consultation, the following sections of this submission focus on key areas where the current high-level policy framework could be strengthened. In particular, we outline recommendations relating to:

- the overall clarity of direction and alignment with circular economy principles,
- the integration of waste hierarchy and upstream interventions,
- and the effective design of EPR and reuse systems to ensure high-quality, socially beneficial outcomes.

2. ZERO WASTE ALLIANCE IRELAND (ZWAI)

At this point we consider that it is appropriate to mention the background to our submission, especially the policy and strategy of ZWAI.

2.1 Origin and Early Activities of ZWAI

Zero Waste Alliance Ireland (ZWAI), established in 1999, is a Non-Government Environmental Organisation (eNGO). ZWAI has prepared and submitted to the Irish Government and to State Agencies many policy documents on waste management, and continues to lobby Government on the issue of using resources more sustainably, and on the implementation of the Circular Economy.

Our principal objectives are:

i) sharing information, ideas and contacts,

ii) finding and recommending environmentally sustainable and practical solutions for domestic, municipal, industrial and agricultural waste management in Ireland;

iii) lobbying Government and local authorities to implement environmentally sustainable waste management practices, including clean production, elimination of toxic substances from products, re-use, recycling, segregation of discarded materials at source, and other beneficial practices;

iv) lobbying Government to follow the best international practice and EU recommendations by introducing fiscal and economic measures designed to penalise the manufacturers of products which cannot be re-used, recycled or composted at the end of their useful lives, and to financially support companies making products which can be re-used, recycled or are made from recycled materials;

v) raising public awareness about the long-term damaging human and animal health and economic consequences of landfilling and of the destruction of potentially recyclable or re-usable materials by incineration; and,

vi) maintaining contact and exchanging information with similar national networks in other countries, and with international zero waste organisations.

2.2 Our Basic Principles

Human communities must behave like natural ones, living comfortably within the natural flow of energy from the sun and plants, producing no wastes which cannot be recycled back into the earth's systems, and guided by new economic values which are in harmony with personal and ecological values.

In nature, the waste products of every living organism serve as raw materials to be transformed by other living creatures, or benefit the planet in other ways. Instead of organising systems that efficiently dispose of or recycle our waste, we need to design systems of production that have little or no waste to begin with.

There are no technical barriers to achieving a "zero waste society", only our habits, our greed as a society, and the current economic structures and policies which have led to the present environmental, social and economic difficulties.

"Zero Waste" is a realistic whole-system approach to addressing the problem of society's unsustainable resource flows – it encompasses waste elimination at source through product design and producer responsibility, together with waste reduction strategies further down the supply chain, such as cleaner production, product repairing, dismantling, recycling, re-use and composting.

ZWAI strongly believes that Ireland should have a policy of not sending to other countries our discarded materials for further treatment or recycling, particularly to developing countries where local populations are being exposed to dioxins and other very toxic POPs. Relying on other countries' infrastructure to achieve our "recycling" targets is not acceptable from a global ecological and societal perspective.

2.3 What We are Doing

Zero Waste Alliance Ireland has prepared many policy documents on waste management, we continue to lobby the Government of Ireland on the issue of sustainable resource management, and to express our concern at the failure to address Ireland's waste problems at a fundamental level.

In recent decades, as many older landfills were closed or became better managed (primarily as a consequence of the implementation of European Directives, Irish legislation transposing these Directives, the development of a waste licensing regime by the Environmental Protection Agency, and the establishment of the Office of Environmental Enforcement in 2003), concern about the public health effects of landfills decreased considerably.

ZWAI therefore concentrated more on the objectives of ensuring that Ireland's government agencies, local authorities and other organisations will develop and implement environmentally sustainable resources and waste management policies, especially resource efficiency, waste reduction and elimination, the promotion of re-use, repair and recycling, and the development and implementation of the Circular Economy.

As an environmental NGO, and a not-for-profit company with charitable status since 2005, ZWAI also campaigns for the implementation of the UN Sustainable Development Goals, including (but not limited to) Goal 12, Responsible Consumption and Production, and Goal 6, Clean Water and Sanitation (having particular regard to the need to avoid wasting water).

In addition to responding to many public consultations, members of ZWAI have given presentations on how the European Union has addressed the problem of plastic waste (March 2019), on single-use plastic packaging by the food industry (November 2019), and other relevant topics.

It will be clear that ZWAI is primarily concerned with the very serious issue of discarded substances, materials and goods, whether from domestic, commercial or industrial sources, how these become “waste”, and how such “waste” may be prevented by re-design along ecological principles. These same ecological principles can be applied to the many ways in which we abstract and use water as a resource, and to the equivalent volumes of wastewater produced as a consequence of these uses.

ZWAI is represented on the Irish Government’s Waste Forum and Water Forum (An Fóram Uisce), is a member of the Irish Environmental Network and the Environmental Pillar, and is funded by the Department of Communications, Climate Action and the Environment through the **Irish Environmental Network**.

In 2019 ZWAI became a full member of the **European Environment Bureau** (EEB); and we participate in the development of European Union policy on waste and the Circular Economy. In 2025, we became members of CAN Europe, the leading European NGO coalition working on climate and energy issues, to strengthen our collaboration with like-minded organisations and to contribute more actively to shaping progressive climate policy at both national and EU levels.

3. THE SUSTAINABILITY OF TEXTILE MATERIALS

3.1 Examination of the Decline in Textile Durability and Its Role in Fast Fashion Waste

The National Policy Statement & Roadmap on Circular Textiles is welcomed for setting a clear direction toward a circular textile economy in Ireland. It is commendable that the roadmap recognises textiles as valuable resources and emphasises reducing excessive consumption, improving resource efficiency, and promoting reuse and repair. The policy rightly acknowledges that most current textiles are not designed for durability, repairability, or recyclability, due to material complexity, low demand, and quality concerns with recycled options.

Global and Irish statistics are alarming: over 100 billion garments are produced annually; Ireland has among the highest per-capita textile consumption in the EU (53kg/person/year), with low reuse rates and frequent clothing purchases. The policy highlights the absence of a national roadmap for circular design, and a lack of data, metrics, and baseline assessments to guide industry and inform policy. It recommends implementing policies that discourage the overproduction of low-quality textiles and promote durable, circular alternatives, supported by upcoming regulations like the EU Eco-Design for Sustainable Products Regulation.

The 2021 EPA report ''Nature and Extent of Post-Consumer Textiles in Ireland Study''[1] estimates total post-consumer textiles in Ireland to be around 170,000 tonnes per year (includes clothing, footwear and other textile products). The per capita generation of post-consumer textiles in Ireland is estimated at 35 kg per person per year, which is higher than the reported EU average of 26 kg per person per year. Estimates show that 65% (around 110,000 tonnes) of total post-consumer textiles each year are collected as waste from household, commercial and industrial sectors, and nearly all are processed via waste-to-energy plants or landfills.

3.1.1 Understanding Durability

Durability refers to the extent to which an item of clothing remains functional and wearable without requiring significant maintenance or repair when subjected to normal wear and washing.

Durability can be broken down into two categories[2]:

- Physical or functional durability refers to strong and well-made products that are built to last and are influenced by design and production quality, including fabric, stitching, fasteners, and finishing techniques. The product is constructed to resist damage and wear and tear.

- Emotional durability means that the garment will continue to be worn by the consumer because it has a strong and positive association, and the design or practicality of the product ensures it stays relevant and desirable to the user or multiple users over time. Designing for durability must include emotional aspects (timeless appeal, attachment) to prevent premature disposal.

Poorly made clothes that are designed to go out of fashion quickly can be considered non-durable. Modern fast-fashion garments tend to fall apart more easily than clothes of the past. Several quality factors have declined, reducing their physical durability. These include inferior fabrics, lower quality stitching and assembly, faster and correspondingly lower quality production as well as designed obsolescence[3] [4].

---

[1] "Nature and Extent of Post-Consumer Textiles in Ireland Study Report." n.d. https://www.epa.ie/publications/circular-economy/resources/Nature-and-Extent-of-Post-Consumer-Textiles-in-Ireland---Study-Report.pdf.

[2] "Durability vs. Recyclability: What's More Sustainable?" 2023. The Sustainable Fashion Forum. The Sustainable Fashion Forum. November 2023. https://www.thesustainablefashionforum.com/pages/durability-vs-recyclability-whats-more-sustainable.

[3] Chu , Sammy, and SGS. 2021. "Durability of Clothing – Why It Matters?" SGSCorp. 2021. https://www.sgs.com/en-ie/news/2021/07/durability-of-clothing-why-it-matters.

[4] "Durability vs. Recyclability: What's More Sustainable?" 2023. The Sustainable Fashion Forum. The Sustainable Fashion Forum. November 2023.

The Environmental Coalition on Standards (ECOS) recent report ‘’Durable, Repairable and Mainstream: How Ecodesign can make our Textiles Circular’’[5] points to research suggesting approximately 60% of discarded textiles are disposed of due to lack of quality or failures in the garment itself (e.g. pillage, colour fastness, properties, tear strength, dimension stability, zipper quality, etc.). Furthermore, charity shops and resale platforms report that an increasing share of fast fashion donations are too poor in quality to resell, so the decline in garment quality further undermines reuse.

Such trends underscore how both the physical and emotional durability of textiles have declined, contributing directly to the fast fashion waste crisis. Fast fashion prioritises low cost and speed, undermining durability in both emotional and physical forms.

3.1.2 Designing for Durability and Longevity

According to The Waste and Resources Action Programme (WRAP) UK (2013)[6] [7], designing for durability or longevity has been identified as the single largest opportunity to reduce the carbon, water and waste footprints of clothing in the UK. If clothes have a longer usable life, they can be replaced less frequently, reducing the volume discarded and meaning fewer resources are consumed in manufacturing.

WRAP's research shows extending clothing lifespan by nine months can reduce carbon, water, and waste footprints by 20%, saving nearly €6 billion annually. Reducing new garment production by 5% through increased duration of first use, reuse, and repair would deliver environmental benefits equivalent to 20 tonnes of GHG emissions. If the number of times a garment is worn were doubled, GHG emissions would decrease by approximately 44%, as compared to the production of a new garment.

The fashion industry is one of the most resource-intensive sectors, with the short lifespan of clothing contributing to excessive waste, resource depletion, and high carbon emissions. Integrating durability into mainstream clothing design is crucial for reducing these environmental impacts. In short, if clothes last longer, they need to be replaced less often, which decreases waste, reduces the need for new clothing production, and allows items to have a second, third, or fourth owner.

---

https://www.thesustainablefashionforum.com/pages/durability-vs-recyclability-whats-more-sustainable.

[5] “Report: Durable, Repairable and Mainstream: How Ecodesign Can Make Our Textiles Circular - ECOS.” 2021. ECOS - Environmental Coalition on Standards. April 20, 2021. https://ecostandard.org/publications/report-durable-repairable-and-mainstream-how-ecodesign-can-make-our-textiles-circular/.

[6] Cooper, Tim, and Helen Hill. 2013. “Design for Longevity: Guidance on Increasing the Active Life of Clothing.”

[7] WRAP. 2025. “Extending Product Lifetimes: WRAP’s Work on Clothing Durability.” WRAP. July 4, 2025. https://www.wrap.ngo/resources/case-study/extending-product-lifetimes-wraps-work-clothing-durability.

Furthermore, increased material efficiency will help reduce the volume of textile waste and its landfilling; overall, more durable products with longer lifetimes are generally associated with higher environmental benefits than recycling.

In relation to measuring and regulating emotional durability, the French government has introduced the concept of "extrinsic (emotional) durability" into policy conversations[8]. France defines emotional durability through five criteria believed to prolong a garment's desirability, which are combined into an "extrinsic durability" score that can adjust a product's environmental impact rating in France's Product Environmental Footprint calculations. Furthermore, a pending French anti-fast fashion bill has proposed penalising ultra-fast fashion practices by 2030 – imposing up to €10 tax per garment on brands that churn out massive volumes of short-lived clothing and even banning advertisements and influencer promotions for the worst offenders such as Shein and Temu. In 2024, EU policymakers debated including "extrinsic durability" in the Waste Framework Directive[9] at the European Council level. If adopted, it could mean EU-wide metrics or rules to hold brands accountable for the speed at which their offerings go out of style. Measuring emotional attachment will be a challenge and addressing the "fast-paced trend cycle" may need a regulatory push alongside consumer education.

ECOS also highlight that the textile industry is driven by fossil fuels, with synthetic fibres produced from finite resources such as crude oil, accounting for two-thirds of the material input for textile production today. They advocate for extending the lifespan of products on the one hand, and, on the other, promoting the use of materials that are sustainably and ethically sourced, produced with a lower carbon footprint, and using renewable energy sources[10].

While design for durability, both physical and emotional, may increase the lifespan of textiles and reduce textile waste, the ECOS report also advocates introducing design for **reusability, repairability and recyclability** on a policy level to fully effect shifting the entire textile industry into a circular business model

As already outlined above, durability relates to a product's ability to last over time with minimal degradation, maintaining its original function. Reusability heavily relies on durability; low-quality garments can't be reused, as shown by the fact that only 15–20% of textiles in Europe are collected for reuse or recycling, and only half of those is reused. Fast fashion and low-cost trends reduce demand for

[8] "En Mode Climat: Changing the Laws so That the Fashion Sector Reduces Its Impact." 2025. Picture. July 4, 2025. https://www.picture-organic-clothing.com/en_US/news/en-mode-climat-changing-the-laws-so-that-the-fashion-sector-reduces-its.

[9] Moreau, Pascale. 2024. "2024 in Review: Key Political and Legislative Events in the EU." Ohana Public Affairs Consultancy. December 12, 2024. https://ohanapublicaffairs.eu/2024/12/12/2024-eu-political-legislative-sustainability-events/.

[10] "Report: Durable, Repairable and Mainstream: How Ecodesign Can Make Our Textiles Circular - ECOS." 2021. ECOS - Environmental Coalition on Standards. April 20, 2021. https://ecostandard.org/publications/report-durable-repairable-and-mainstream-how-ecodesign-can-make-our-textiles-circular/.

reused garments, so a proper redistribution infrastructure and business models are needed to support reuse.

Repairability relates to the ease with which garments have easily replaceable parts or access to spare components. Major causes of discarding clothes include wear and tear (50–60%) and lack of repair. The fashion industry lacks producer responsibility for facilitating repairs. Finally, the recyclability of textiles is negatively impacted using mixed fibres, chemical treatments, and the lack of effective collection systems.

Whether through composting, recycling, or remaking, a circular system should be designed so that products can be remade, reused, and recycled after reaching their maximum use and end of life. This means that products can be disassembled in a way that allows their components and materials to be reused or recycled.

An additional challenge is that according to the Sustainable Fashion Forum[11], durability and recyclability can be conflicting goals. They point out that, in terms of textile recycling, the materials used to make more durable or "built to last" products (e.g., mixed fibres) are often challenging and sometimes nearly impossible to separate and recycle at their end-of-life within the current infrastructure. While some brands promote take-back schemes as a circular solution, these often mask the scale of the industry's waste problem. Despite marketing claims of reuse and recycling, research reveals that around 60% of collected clothing either sits in warehouses, is downcycled or destroyed, or is exported to countries in the Global South—many of which lack the infrastructure to handle such textile waste. This not only fails to achieve meaningful circularity but also shifts the environmental and social burden elsewhere[12].

The ECOS Report indicates that legislative, policy, standards, and other instruments related to textile design tend to emphasise durability and recyclability more than reusability and repairability. Key gaps identified included a lack of targeted lifespan estimates for garments and a lack of quantitative indicators or thresholds.

The EU's Strategy for Sustainable and Circular Textiles (2022) and proposed Ecodesign for Sustainable Products Regulation (ESPR) do focus on durability. By 2030, the EU's vision is that all textiles placed on the market will be "durable, repairable, recyclable" (and largely made of recycled fibres, free of hazardous substances). To get there, the ESPR will set binding design requirements for clothing. These are expected to include minimum standards for durability – for example, mandating that fabrics meet certain benchmarks for tear strength, colourfastness, seam strength, abrasion resistance, etc. Such criteria already

[11] "Durability vs. Recyclability: What's More Sustainable?" 2023. The Sustainable Fashion Forum. The Sustainable Fashion Forum. November 2023. https://www.thesustainablefashionforum.com/pages/durability-vs-recyclability-whats-more-sustainable.

[12] Trunk , Urska , George Harding-Rolls, and Nusa Urbancic. 2023. "Take-Back Trickery an Investigation into Clothing Take-Back Schemes."

exist in voluntary labels: the EU Ecolabel and Nordic Swan eco-certifications, for instance, require textiles to pass specific durability tests and quality thresholds as part of their sustainability criteria[13]. The idea is to ensure new clothes are built to last longer under normal use.

In terms of repair and reuse, the EU and national governments are rolling out measures to make repair and reuse more accessible. From 2025, EU members must implement separate textile collection, making it easier for people to drop off unwanted clothes for sorting rather than tossing them in general waste[14].

Some EU countries are experimenting with right-to-repair style incentives for textiles. For example, France launched a scheme in 2023, subsidising part of the cost of clothing repairs for consumers at approved workshops[15]. Clothing rental and swapping are also being promoted as circular models, particularly for occasion wear or rapidly changing wardrobes. Public awareness campaigns such as the EU's #ReFashionNow / #ResetTheTrend are leveraging social media to make sustainable fashion choices aspirational, encouraging consumers to "shop their own closet" and re-style what they own rather than constantly buying new[16]. Public awareness campaigns are discussed in more detail later in this submission.

The overall policy mix, from eco-design and EPR to consumer education and support for reuse infrastructure, reflects a holistic approach to addressing fast fashion waste. By intervening at multiple stages (design, marketing, retail, use, and end-of-life), it is hoped that the EU and Ireland can alter the trajectory from a linear "take-make-dispose" model to a circular one, where garments are utilised to their full potential.

3.2 The case of Irish Wool Being Wasted as a Byproduct: Opportunities for Circular Use

Since 2002, wool has been reclassified as a Category 3 animal by-product (same as carcasses), making it subject to waste regulations that discourage its use. Farmers are paid as little as 5–20c/kg for wool, while shearing costs ~80c/kg, making wool collection a net loss. Ireland has no commercial scouring (washing) facilities, so wool is sent abroad (mainly UK), increasing costs and eroding the identity of "Irish wool." Wool often sits unused in sheds for years, deteriorating in

[13] "Report: Durable, Repairable and Mainstream: How Ecodesign Can Make Our Textiles Circular - ECOS." 2021. ECOS - Environmental Coalition on Standards. April 20, 2021. https://ecostandard.org/publications/report-durable-repairable-and-mainstream-how-ecodesign-can-make-our-textiles-circular/.

[14] "Circularity of the EU Textiles Value Chain in Numbers." 2025. Europa.eu. July 4, 2025. https://www.eea.europa.eu/en/analysis/publications/circularity-of-the-eu-textiles-value-chain-in-numbers.

[15] Kirby, Paul. 2025. "French to Get Bonus to Make Do and Mend Clothes." *BBC News*, July 4, 2025, sec. Europe. https://www.bbc.com/news/world-europe-66174349.

[16] ECCP Team. 2023. "Join the ReSet the Trend - #ReFashionNow Campaign | European Cluster Collaboration Platform." Clustercollaboration.eu. February 7, 2023. https://www.clustercollaboration.eu/content/join-reset-trend-refashionnow-campaign.

quality and representing both economic loss and environmental waste. Global dominance of synthetic fibres has displaced natural wool, especially coarse Irish wool (~30+ micron), which is less valuable in fashion textiles[17].

Yet there is a huge untapped circular & sustainability opportunity in Ireland's native wool market. Wool is a natural, renewable, biodegradable resource that, unlike synthetics, breaks down in the environment in as little as three to four months and does not shed microplastics.

Irish wool has multiple applications, suitable not just for textiles (e.g. carpets, rugs), but also for construction insulation, packaging, soil mulch, oil absorbents, and bio-based materials like lanolin and keratin. Wool is a short-term store of atmospheric carbon, sequestered in a resilient, usable form for the life of the garment or textile. Wool aligns fully with the EU Textiles Strategy 2030's vision of long-lived, recyclable, non-toxic, and sustainable textiles.

The 2022 Wool Feasibility Study, Review of Market Opportunities for Irish-Grown Wool-based Products, funded by the Department of Agriculture, Food and the Marine (DAFM, 2022)[18] emphasises how sheep wool is perfectly placed to contribute to the increased interest and need for natural and sustainable fibres worldwide. Irish wool is typically characterised as 'strong wool' and is generally more suited to applications in woollen wear and as carpets, filled products and rugs. The 2022 Wool Feasibility study identified further applications of Irish-grown wool in construction (insulation, building blocks), packaging (insulated filler material), environmental (oil sorbent), and high-value products (lanolin, keratin, ceramides). While there has been an increase in the number of projects looking at improving the value of Irish wool and developing innovative products from wool, they do not address a major challenge of the wool value chain in Ireland, which includes a lack of information and validation of the front-end environmental, social and economic impact of the Irish grown wool.

There is great potential for Irish-grown wool in localised, high-value, short-supply-chain textile production, contributing to rural economies and Ireland's climate goals.

The National Policy Statement & Roadmap on Circular Textiles does recognise the need to increase the use of sustainable, natural fibres and reduce reliance on synthetics. It is also positive to see that the Policy Statement emphasises support for indigenous textile value chains, supports design and production of longer-lasting and more repairable products and endorses reinvestment in textile manufacturing infrastructure and skills development.

---

[17] "Research Projects | Regenerative Value Systems for Irish Grown Wool in Ireland (REVEIRE) | UCC Sustainability Institute." 2022. Www.ucc.ie. 2022. https://www.ucc.ie/en/sustainability-institute/projects/regenerative-value-systems-for-irish-grown-wool-in-ireland-reveire.html.

[18] "DEPARTMENT of AGRICULTURE, FOOD and the MARINE; REVIEW of MARKET OPPORTUNITIES for IRISH-GROWN WOOL- BASED PRODUCTS." 2022.

However, there is no mention of wool at all, despite Ireland producing nearly 7,000 tonnes/year, nor any attempt to address the regulatory and infrastructure barriers that make Irish wool economically unviable. The policy makes no reference to natural fibre value chains as a circular opportunity, rather the focus is heavily on recycling and design, not on bio-based material flow.

Furthermore, it misses the opportunity to link wool with construction, agriculture, packaging, and non-fashion applications, and makes no reference to the 2022 Wool Feasibility Study, which DAFM funded and which provides a comprehensive opportunity map. Neither is there any reference to wool's carbon storage potential, a major blind spot given Ireland's climate targets.

3.3 Ecological Impacts of Microplastics from Textiles & Policy Measures on Fibre Pollution and Materials

The ecological damage caused by synthetic clothing is one of the most urgent but underrepresented issues in the draft roadmap. Microplastics shed from synthetic textiles, such as polyester, nylon, and acrylic, enter wastewater systems during the washing process. From there, they pass through water treatment plants and flow into rivers, lakes, and oceans, where they are consumed by aquatic organisms and eventually enter the food chain. A single laundry load of synthetic clothing can release **up to 700,000 microfibres**[19].

Microplastic pollution has been linked to physical and chemical harm to marine life, including digestive blockage, reduced reproduction, and increased mortality. These plastics also absorb persistent organic pollutants (POPs), which can then accumulate in the tissues of organisms and transfer up the food chain, including to humans[20].

In Ireland, studies have found microplastics present in marine sediments and freshwater systems, yet the draft roadmap makes no mention of monitoring or mitigation. It also fails to account for the terrestrial spread of microplastics through sewage sludge, which is often applied to agricultural land as fertiliser. This can affect soil health and potentially contaminate crops.

Given the mounting scientific evidence, textile microfibres must be treated as a serious pollutant, not a secondary concern. The roadmap should propose funded research, robust monitoring, and specific strategies to reduce microfibre release at the source.

---

[19] Napper, I.E. and Thompson, R.C. (2016) 'Release of synthetic microplastic plastic fibres from domestic washing machines: Effects of fabric type and washing conditions', *Marine Pollution Bulletin*, 112(1–2), pp. 39–45. doi: 10.1016/j.marpolbul.2016.09.025.

[20] GESAMP (2015) *Sources, fate and effects of microplastics in the marine environment: a global assessment*. IMO/FAO/UNESCO-IOC/UNIDO/WMO/IAEA/UN/UNEP/UNDP Joint Group of Experts on the Scientific Aspects of Marine Environmental Protection. (GESAMP Reports and Studies No. 90). Available at: https://www.gesamp.org/publications/sources-fate-and-effects-of-microplastics-in-the-marine-environment-a-global-assessment (Accessed: 6 July 2025).

Despite acknowledging the need for more sustainable materials, the roadmap lacks firm commitments or incentives to reduce the use of synthetic, fossil-based fibres. Relying on voluntary producer action will not drive the scale of change required. Stronger measures are already being implemented in other EU countries. For example, **France will require all new washing machines to include microfibre filters** from 2025, a simple but powerful intervention to prevent fibre pollution at the household level.

Ireland should follow suit. The roadmap must set a timeline to phase out virgin plastic fibres and promote alternatives such as certified organic cotton, hemp, recycled wool, or biodegradable blends. Only with clear targets, mandatory requirements, and investment in innovation can Ireland move beyond vague ambition and begin to systematically eliminate textile pollution at its source.

4. Extended Producer Responsibility (EPR): A Welcome Commitment Requiring Greater Clarity and Urgency

The inclusion of a dedicated EPR roadmap for textiles (Action 3), in alignment with forthcoming EU obligations, is welcomed. However, we note that:

- The draft policy **does not set a clear timeframe for EPR scheme implementation**, only referencing a roadmap development timeline of 2025–2028.
- The document **does not define minimum expectations** for what the EPR scheme should achieve, nor how producers will be incentivised to reduce waste and overproduction.
- There is limited reference to **governance structures**, particularly regarding the inclusion of social and circular economy stakeholders in scheme design and delivery.

Experience from other jurisdictions underscores the importance of targets. The EU's recent policy developments in other sectors have started to incorporate **waste prevention targets**, not just recycling rates – for example, the new Packaging and Packaging Waste Regulation introduces binding waste reduction targets of 5% by 2030 (rising to 10% by 2035 and 15% by 2040) relative to 2018 levels. Similarly, leading countries in textile EPR have adopted quantitative goals. **The Netherlands' textile EPR scheme, launched in 2023, sets a target that by 2025 at least 50% of textiles placed on the market must be prepared for reuse or recycled, increasing to 75% by 2030**. Such clear targets drive the system to achieve high recovery rates in a defined timeframe. France, in updating its mature EPR program, has also moved toward target-setting for circularity – for example, setting a goal of attaining a 15% reuse rate (domestically, within a 1,500 km radius of collection) by 2027. These examples illustrate how targets can be ambitious yet concrete, addressing not only recycling but also **prevention and reuse**, which are higher in the waste hierarchy.

For Ireland's textile policy, **including specific, measurable targets will be critical** to ensure the EPR scheme actually leads to waste reduction and greater circularity. Targets could cover areas such as: a reduction in textile waste generated per capita by a certain percentage, an increase in the collection rate (e.g. collecting X% of all post-consumer textiles by 2030), and a minimum reuse or fiber-to-fiber recycling rate. Clear benchmarks aligned with EU goals would provide a yardstick for Ireland's performance and help guide producers' and recyclers' efforts. They also enable transparent evaluation of the policy's success over time. In summary, without well-defined targets, an EPR scheme may lack focus; with them, it can drive significant environmental gains and signal Ireland's commitment to tackling textile waste decisively.

ZWAI Recommendations:

- **Clarify intent** to implement EPR by 2026, in line with expected EU adoption of mandatory EPR provisions under the Waste Framework Directive revision.

- Establish **high-level EPR design principles** in this policy statement, such as:

    - Eco-modulation of producer fees based on product durability, repairability, and recycled content.

    - Prioritisation of reuse and prevention over recycling.

    - Transparent and inclusive governance, involving social enterprise representatives and independent civil society experts.

    - Mandate that a **minimum percentage of EPR funds be ring-fenced** to support non-profit reuse, repair, and education initiatives.

4.1 Application of the Polluter Pays Principle

The draft National Policy Statement & Roadmap on Circular Textiles points to the European Commission's new legislative proposal[21] planning ''to introduce mandatory Extended Producer Responsibility (EPR) schemes for textiles. The key objective of the proposed EPR scheme is to apply the "polluter pays principle while creating an economy for textile collection, sorting, reuse and recycling.'' The draft Policy Statement for Ireland names the Polluter Pays Principle as one of its key principles underpinning the policy framework, defining it as follows: ''Application of the principle means that polluters bear the costs of their pollution including the cost of measures taken to prevent, control and remedy pollution and the costs it imposes on society. By applying the principle, polluters are incentivised to avoid environmental damage and are held responsible for the

[21] https://environment.ec.europa.eu/publications/proposal-targeted-revision-waste-framework-directive_en

pollution that they cause. It is also the polluter, and not the taxpayer, who covers the cost of remediation.''

Considering this definition, it is noteworthy that both key strategic action points 3[22] and 4[23] from the Roadmap focus on providing financial support to, among others, textile operators to enhance the circularity of their business models and increase reuse, repair, and preparation for reuse activities. While subsidies can encourage the adoption of circular models, they may also conflict with the Polluter Pays Principle by using taxpayer money rather than the polluters' financial resources to cover the cost of remediation activities.

Additional applications of the Polluter Pays Principle in the draft policy statement are scarce. For example, although key strategic action point 3 from the Roadmap states that ''Producer fees will be subject to eco-modulation.'' there is no further information detailing how this will be implemented.

5. Importance of Supply Chain Traceability for Transparency and Accountability

Traceability in the textile industry refers to the ability to follow a product's journey from raw material to finished garment. It plays a crucial role in promoting sustainability by enabling responsible sourcing, fair labour practices, and environmentally conscious manufacturing. When fully implemented, traceability provides a clear view of each stage in the supply chain, supporting transparency and accountability while allowing consumers to make more informed, ethical purchasing decisions[24].

As awareness grows around the social and environmental impacts of fashion, pressure has increased for companies to disclose where and how their products are made. Traceability enables the credible sharing of information, covering raw material origins, production processes, working conditions, and transportation impacts. It is also essential for backing up claims about a product's lifecycle footprint, whether social, environmental, or economic. In this way, traceability connects all stakeholders in the supply chain and serves as a foundation for trustworthy product data exchange.

The textile industry is a significant global polluter, responsible for substantial carbon emissions, water usage, and chemical discharge. Transparency driven by traceability can expose these impacts, creating incentives for companies to adopt

[22] ''The EPR scheme will be required to fund waste prevention activities including circular economy awareness campaigns and to support the role of textile operators including social enterprises, in the collection and sorting of post-consumer textiles and in relation to reuse, repair and preparation for reuse activities.'' (see page 19 of the draft National Policy Statement & Roadmap on Circular Textiles)

[23] ''Provide investment and sufficient financial support to incentivise circular business models and social enterprises and boost jobs'' (see page 19-20 of the draft National Policy Statement & Roadmap on Circular Textiles)

[24] Akhteruzzaman, Md. 2023. "Supply Chain Traceability Is Key to Sustainability." Textile News, Apparel News, RMG News, Fashion Trends. May 2, 2023. https://www.textiletoday.com.bd/supply-chain-traceability-is-key-to-sustainability.

cleaner, safer production methods. However, implementing transparency comes with challenges.

Brands often face logistical difficulties in collecting reliable data across complex, multi-tiered supply chains. There are also commercial concerns, such as the fear of revealing proprietary business practices, and risks of superficial transparency or greenwashing, where companies overstate their sustainability credentials without making actual changes.

To address these concerns, independent certification systems such as Fair Trade and the Global Organic Textile Standard (GOTS) provide third-party validation and increase consumer trust[25]. These systems help verify that products meet ethical, environmental, and safety criteria, and offer traceability frameworks that track goods throughout the supply chain. However, the lack of industry-wide standards remains a barrier. Without a unified reporting structure, companies are left to interpret transparency differently, making it difficult for consumers to assess or compare brands on the basis of sustainability. Standardised frameworks help streamline practices and foster consistency in disclosures. Alongside durability and repairability, the EU is also looking to curb microplastic shedding and requires clearer information (via Digital Product Passports) about each product's material composition and care, all of which support longer use and better end-of-life handling.

Traceability can be implemented through technologies such as blockchain, RFID tagging, and supply chain management platforms that document each transaction and movement of goods. These systems enhance data accuracy and make supply chains more resilient to disruption, while also preparing companies for emerging regulations that require robust environmental and social accountability[26].

At present, the National Policy Statement and Roadmap on Circular Textiles does not reference traceability or supply chain transparency, which is a significant gap given the central role these concepts play in upcoming EU regulations, particularly the Ecodesign for Sustainable Products Regulation (ESPR) and Digital Product Passport (DPP) requirements. These will require detailed traceability of material content, durability, and recyclability. Including traceability measures in national policy would help Ireland align with EU standards, strengthen accountability across the textile sector, and better support the transition to a circular economy.

[25] Landgraf, Vivian Eve. 2024. "Key Features - GOTS - Global Organic Textile Standard." Global-Standard.org. 2024. https://global-standard.org/?view=category&id=106.

[26] Dev Sethi, Rohit. 2024. "Traceability in the Textile Supply Chain: Ensuring Transparency from Source to Shelf." Textile Focus. October 23, 2024. https://textilefocus.com/traceability-in-the-textile-supply-chain-ensuring-transparency-from-source-to-shelf/.

5.1 Data and Transparency as Pre-Conditions for Circularity

The policy notes the significant gaps in baseline data, but does not clearly state that **textile-related data collection will become mandatory**, nor how transparency on the fate of exported post-consumer textiles will be achieved.

This is a critical omission, given the acknowledged opacity in global used textile markets and the risk of undermining genuine circularity through **downcycling or dumping in developing countries**.

ZWAI Recommendations:

- Clarify that **mandatory data reporting obligations** will apply to producers, collectors, and exporters under the EPR scheme.
- Commit to developing **textile flow accounting standards** aligned with EU and international frameworks, ensuring transparency on both reuse and disposal pathways.

Emphasise that traceability, particularly for exported materials, will be a **core policy requirement**, not a downstream operational detail.

6. The Role of Green Public Procurement (GPP) in Shifting Demand Towards Sustainable Textiles

6.1 GPP's Ability to Shift Demand Towards Sustainable Textiles

Public procurement amounts to 14% of the European Union's GDP[27], and 10-12% of Ireland's GDP annually[28]. With textiles specifically being responsible for over €8 billion of public spending in the EU every year[29]. This showcases the potential of public procurement to influence the supply chain by signalling demand for socially and environmentally sustainable products.

In 2023 the EU reported, based on what they refer to as ''very limited and often unreliable data available on textile procurement and GPP implementation levels'', that about 71% of all EU Member States are unlikely to meet the 50% EU GPP target for textile product and service procurement, while 11% may reach around

[27] https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32024R1781&qid=1719580391746

[28] https://www.gov.ie/ga/an-roinn-aer%C3%A1ide-fuinnimh-agus-comhshaoil/foilseachain/green-public-procurement-gpp/#:~:text=The%20Government%20of%20Ireland's%20annual,of%20economic%20activity%20and%20demand

[29] https://api.fairwear.org/wp-content/uploads/2021/08/Joint-position-paper-EU-Strategy-for-Sustainable-Textiles.pdf

50%, and 18% likely exceed it[30]. The realisation that there is a significant need for improvement in the public procurement of textiles probably led to textiles being one of the top-priority product categories for mandatory minimum GPP requirements in the 2024 Ecodesign for Sustainable Products Regulation (more about this in the next sub-section).

Despite GPP's reputation for being an effective, demand-driven influencer of environmental innovation, there seems to be little empirical evidence to support this claim. A 2022 study found that winning public procurement tenders that include additional environmental award criteria positively influenced the adoption of environmental innovations by small- and medium-sized firms by an average of 20%. However, there was no significant effect on larger firms[31]. Furthermore, the OECD 2022 survey on GPP, conducted across 38 countries, also highlighted a significant gap in data regarding the impacts of GPP strategies. They reported that ''while governments tend to monitor the use of GPP within their public procurement activities, they rarely evaluate its impact, missing an opportunity to better understand -- and promote -- the concrete impact of GPP on environmental factors, such as CO2 emissions''[32].

Despite the limited data on GPP's ability to influence the textile market's environmental sustainability practices, Zero Waste Alliance Ireland believes that GPP practices are crucial - as formulated well in the European Green Deal: "public authorities, including the EU institutions, should lead by example and ensure that their procurement is green". We therefore welcome the inclusion of GPP in this National Policy Statement & Roadmap on Circular Textiles.

6.2 Is Ireland Ready for the EU's Mandatory GPP Requirements for Textiles?

The EU Ecodesign for Sustainable Products Regulation (ESPR), published in 2022 and adopted in 2024, introduces mandatory Green Public Procurement for textiles. This enables the EU to establish mandatory minimum standards for public procurement, mandating that public buyers, including government entities, give precedence to environmentally sustainable products. In April 2025, the European Commission published its 2025-2030 Working Plan for the ESPR, which identifies textiles as a priority product category. Each product category covered by the ESPR will have its own delegated act, detailing the specific requirements for that sector. The Commission is currently working on setting the minimum public procurement requirements for the priority product categories, and with a deadline for adoption set for 2027, textiles will be among the first

[30] https://circabc.europa.eu/ui/group/44278090-3fae-4515-bcc2-44fd57c1d0d1/library/9c739228-8b08-41a3-9ca9-d60458c7dc65/details

[31] Krieger, B. & Zipperer, V. (2022). Does green public procurement trigger environmental innovations?. *Research Policy, 51*(6). https://doi.org/10.1016/j.respol.2022.104516

[32] https://www.oecd.org/content/dam/oecd/en/publications/reports/2024/06/harnessing-public-procurement-for-the-green-transition_ef16c8d4/e551f448-en.pdf

product categories to have the delegated act published. This section assesses how well Ireland's current policy landscape is adapted to the upcoming mandatory GPP requirements by examining the National Policy Statement & Roadmap on Circular Textiles, as well as other related policy documents.

Ireland published its Green Public Procurement Strategy and Action Plan in 2024. The strategy has a broad sector focus, setting Green Public Procurement targets across various areas of public procurement within the economy, including textiles, but does not go into specifics of any particular sector. Instead, it mentions the development of the Roadmap in question here and points towards the EPA Green Public Procurement Guidance and Criteria for Textile Products and Services. The latter document was updated in 2024 to match the criteria provided by the European Union in its Green Public Procurement Criteria for Textile Products and Services. This makes Ireland one of the few countries that utilise the EU criteria directly, as pointed out by the European Commission in their technical report on GPP for Textile Products and Services[33]. Given that the details of the upcoming mandatory minimum GPP requirements for textiles by the EU are still unknown, it is a prudent move of the Irish government to align its new strategies with the current EU criteria. This approach reduces the likelihood of facing significant compulsory adjustments to GPP standards in the coming years.

Considering the above policy landscape in which multiple regulations, guidelines, and criteria on GPP of textiles already exist in Ireland, it is understandable that this National Policy Statement & Roadmap on Circular Textiles does not have an extensive focus on GPP. The draft Policy Statement & Roadmap describes the key EU and national policy developments in its appendix, referencing developments in GPP regulation. Nevertheless, it is advisable to include at least a reference to some of these policy developments in the introduction of the document to give a clearer picture of its role within the policy landscape on circular textiles (related explicitly to GPP).

The Roadmap's key strategic action number 10 focuses on GPP, stating: ''all public bodies procuring textile products or services to include GPP Criteria in published tender documentation using the EPA's National GPP Criteria for Textiles Products and Services, as appropriate and proportionate.'' The strategic action does not specify how it will be assessed whether the inclusion of GPP criteria in tenders is ''appropriate and proportionate''. This lack of specificity makes it difficult to measure progress on this key strategic action. As stated in the draft Policy Statement & Roadmap itself, what cannot be measured cannot be managed. In the case that other policy documents explain in more detail how ''appropriate and proportionate'' will be assessed, reference that document in the text.

[33] https://circabc.europa.eu/ui/group/44278090-3fae-4515-bcc2-44fd57c1d0d1/library/9c739228-8b08-41a3-9ca9-d60458c7dc65/details

In response to the results of their 2022 survey on GPP[34], the OECD urged countries to:

- Establish robust reporting and monitoring systems to oversee GPP implementation and evaluate results
- Invest in professional training for the procurement workforce involved in GPP
- Actively engage with the market to foster the growth of green markets and ensure that green public tenders are aligned with the capacities and resources of private suppliers.

All of these points are covered in Ireland's Green Public Procurement Strategy and Action Plan 2024. When it comes to reporting and monitoring, the EPA has published its GPP Annual Report on Adoption, Monitoring and Reporting by Government Departments every year since 2021[35]. The latest report, covering the year 2023, shows that nearly half of all public tenders from government departments (above €50.000), and 75% of tenders for textile products and services, now include GPP criteria. This is a significant increase compared to 2021, when it was only 24% (for those tenders above €25.000)[36]. The GPP Strategy and Action Plan also recognises areas for improvement and aims to broaden reporting and monitoring to include all public bodies, not just government departments, which is a welcome and essential step to be able to monitor the full GPP landscape in Ireland. In 2024, the OECD published a report on the digital transformation of public procurement in Ireland, where they pointed out that ''Advances in the digitalisation of public procurement in Ireland have not consistently addressed access to and sharing of high-quality and timely procurement data.''[37] The report continues to emphasise that improvements in this area will enhance procurement decisions and strategies, which will also support public bodies' ability to implement GPP practices.

7. Education & Public Awareness

7.1 Consumer Education on Overconsumption

The draft policy acknowledges the need to address overconsumption as a critical issue but fails to provide a clear, actionable strategy to confront it. It touches lightly on behaviour change but does not tackle the systemic and cultural forces that drive fast fashion. In a market where consumers are constantly targeted by

[34] https://www.oecd.org/content/dam/oecd/en/publications/reports/2024/06/harnessing-public-procurement-for-the-green-transition_ef16c8d4/e551f448-en.pdf
[35] https://www.epa.ie/our-services/monitoring--assessment/circular-economy/green-public-procurement/
[36] https://www.epa.ie/publications/circular-economy/resources/EPA_GPP_Report_2023-with-link.pdf
[37] https://www.oecd.org/en/publications/the-digital-transformation-of-public-procurement-in-ireland_87912457-en.html

aggressive advertising and pressured by ever-changing trends, education must extend far beyond simple awareness. It must be part of a wider cultural shift that redefines our relationship with clothing.

To transform the textile sector, both producers and consumers must change their behaviour simultaneously. Producers must be held accountable for the volume and durability of what they bring to market, while consumers need to be empowered with the knowledge, tools, and motivation to demand better. This cannot be achieved through vague messaging; it requires sustained, well-funded campaigns and integration into the national curriculum.

Overconsumption cannot be properly addressed without mentioning the catastrophic effect social media has had on our consumption habits. Studies show that between 2010 and 2020, as platforms like Instagram rose in popularity, European consumers purchased up to 60% more clothing, while the average number of wears per item dropped significantly[38]. With personalised algorithms, ads and influencers glamorising constant consumption, these figures are hardly surprising. The culture of "haul videos" and aspirational influencer lifestyles all create a psychological environment in which buying more becomes synonymous with social belonging.

This is especially dangerous for young people, who are more likely to see influencers as relatable role models rather than advertisers. Public campaigns must go beyond familiar calls to recycle, these messages tend to reach people already inclined toward sustainable habits. Instead, campaigns should challenge the illusion that new clothing enhances one's social value or personal identity. We must invest in storytelling that reframes clothing as something to be cherished, cared for, and worn proudly over time. Consumers need to be reminded that their value is not tied to their appearance or the trendiness of their wardrobe.

7.2 Public Awareness Campaigns

While the roadmap briefly acknowledges public engagement, it stops short of offering a national strategy. This is a critical failure. Ireland currently has no widespread, visible public campaigns addressing fast fashion or microplastic pollution.

Ireland needs an ongoing, multi-platform campaign that uses storytelling, humour, and social credibility to challenge overconsumption. These messages must be diverse and demographic-specific: younger people may respond to influencer-led content, while older audiences may benefit more from traditional media and community outreach. Crucially, public campaigns should not only promote better behaviour but normalise and celebrate it.

[38] European Environment Agency (2023) *Textiles and the environment: the role of design in Europe's circular economy*. EEA Briefing 12/2023. Available at: https://www.eea.europa.eu/publications/textiles-and-the-environment-the (Accessed: 6 July 2025).

Just as fashion brands use sophisticated algorithm-driven advertising on social platforms, so too must public awareness efforts. We must fund partnerships with sustainable fashion advocates, educators, and micro-influencers who speak to younger audiences in their own language.

Campaigns like Sweden's Textilsmart, run by the Swedish EPA, Consumer Agency, and Chemicals Agency, do exactly this. They spread accessible information via Instagram, their website, and through partner organisations and municipalities. The campaign has been further amplified through collaborations with micro-influencers as part of the Fact Movement, which brings sustainability messaging directly into the personalised feeds of young consumers.

Furthermore, the government must prioritise early education through funded workshops in schools and universities. Embedding awareness at a young age is essential for challenging fast fashion norms before they become deeply ingrained. Delivered in partnership with NGOs, circular fashion experts, or social enterprises, these sessions can encourage critical thinking, creativity, and personal agency. At the university level, integrating sustainability into curricula and student societies can spark peer-led initiatives that extend beyond the classroom. Government support for this work is vital to ensuring equal access across regions and educational settings. If Ireland is serious about shifting public behaviour, investment in hands-on, age-appropriate learning must be a central pillar of its public awareness strategy.

Textile hubs can serve as physical centres for engagement. In the Netherlands, cities like Amsterdam and Tilburg have developed advanced textile hubs that integrate public awareness with reuse and recycling infrastructure. These hubs bring together designers, collectors, social enterprises, and local governments to create visible circular economies. In Sweden, ReTuna, a shopping mall exclusively for reused and upcycled products, also serves as a public education space, offering workshops and events that make sustainable living tangible. Ireland greatly lacks such infrastructure. The creation of regional textile hubs could provide a place for education, repair, and resale to coexist, embedding sustainability in the daily lives of communities.

8. Absence of Measurable High-Level Targets

It is acknowledged that this policy is intended to provide strategic direction, with operational details to follow in future plans. However, the lack of even **indicative national targets** for reducing textile waste, increasing reuse rates, or cutting per capita consumption may hamper accountability and cross-departmental coherence.

This gap is especially notable given Ireland’s stated leadership on circularity and the commitments in the forthcoming second Circular Economy Strategy.

The draft policy document should be strengthened by including a clearer baseline analysis and proposing key performance indicators (KPIs). At minimum, it ought to acknowledge current best-available figures: for instance, approximate annual

textile waste arisings, current collection rates, and the recycling/reuse rate (even if low, such as the often-cited figure that **less than 1% of textiles are recycled into new clothes globally**). More importantly, the policy should commit to improving data collection. EPR schemes themselves can greatly enhance data availability – when producers are obligated to report the number of tonnes of textiles they put on the market, and waste operators report the amount collected and processed, the country will finally acquire solid data on material flows. Indeed, one expert cautions that many estimates circulating now are rough; only with EPR "in place and producers obliged to declare what they put on the market" will we have solid numbers to plan against. In light of this, the lack of concrete baseline metrics in the current draft is a critical gap. We recommend that the final policy explicitly address this by including a plan for baseline data gathering (perhaps a preliminary study or pilot reporting phase) and by defining metrics that will be used to evaluate the EPR scheme's performance annually. Without such measures, Ireland risks implementing EPR without a way to know if it's succeeding. In summary, **establishing a baseline and clear metrics is not just a technical detail, but a cornerstone of accountable and effective policy** – this must be remedied in the policy before implementation.

ZWAI Recommendations:

- Include headline policy **targets to guide future strategy development**, e.g.:
    - 50% increase in the reuse of textiles by 2030;
    - Reduction of per capita textile consumption to below the EU average by 2030;
    - Separate collection of 70% of post-consumer textiles by 2028.

Explicitly reference the need for **data-driven targets**, to be adjusted once the textile flow mapping and baseline data work (Action 11) is complete.

9. Policy Integration and Implementation Challenges

The transition to a circular textiles system will **interact with multiple regulatory domains** and may face institutional or sectoral resistance.

We note the policy's silence on the possible **frictions between circularity ambitions and other national or EU-level obligations**, such as:

- **Chemical regulation and fire retardants**: Some textiles (e.g., furnishings, automotive fabrics) are treated with substances that complicate recycling or reuse.
- **Product safety or hygiene standards**: These may inadvertently prevent reuse or upcycling in sectors like healthcare, hospitality, or construction.

- **End-of-Life Vehicles (ELV) Regulation**: Automotive textiles remain outside the current textile policy scope, though significant in volume.

ZWAI Recommendations:

- Acknowledge in the policy the need to **review potential regulatory conflicts** and ensure policy coherence across national and EU frameworks.

- Commit to cross-departmental working groups (e.g., DECC, Department of Enterprise, Department of Transport) to identify and resolve overlapping regulations that might impede circularity.

10. Recognition of the Social Economy Needs to Translate into Concrete Support

ZWAI welcomes the policy's repeated references to the role of social enterprises and the community reuse sector. However, we caution that these acknowledgements are **not currently backed by policy guarantees**, safeguards, or resource commitments.

Given the disproportionate burden placed on the community sector in managing post-consumer textiles (e.g., through charity shops, local repair initiatives), and the well-documented challenges they face in competing with commercial actors, this is a missed opportunity.

ZWAI Recommendations:

- Include a high-level policy commitment to **protect and prioritise the role of social enterprises** in the circular textile ecosystem.

- Ensure any public support (including under EPR) is designed to reach these actors fairly and effectively, with capacity-building funding attached.

Explore whether a **"right of first access" to post-consumer textiles** can be guaranteed to the reuse and repair sector before materials are sold for lower-value recovery.

11. Key Considerations & Final Comments

Several key recommendations regarding durability, longevity, and traceability were already outlined in the National Textile Advisory Group's Recommendations to the Minister of State with responsibility for the Circular Economy. The recommendations below reiterate and build on these recommendations to address the challenges outlined above in relation to supporting longer-lasting, locally sourced textiles.

- Prioritise the integration of eco-modulation into the upcoming EPR. Ensure that any new EPR system includes levies that effectively encourage

circular design practices, from designing for recyclability and durability to selecting better materials.

- Develop programmes and legislation to enhance the quality and durability of clothing produced and/or sold in Ireland, reducing the normalisation of overproduction of low-quality, short-lived textiles and garments. Standards and protocols, such as WRAP UK, which specify minimum functional durability standards for textiles—including thresholds for pilling resistance, tear strength, seam integrity, colour fastness, and dimensional stability—should be adopted. This approach would also align with ECOS guidance on developing product-specific durability benchmarks and testing protocols that mirror real-world use, such as hours worn and number of washes.
- Establish labelling standards, digital product passports, and environmental footprinting to empower consumers to know what items are made of and how 'circular' they are. Many of these requirements will be guided by the Ecodesign for Sustainable Products Regulation. Additionally, a national traceability roadmap should be developed for all imported and domestically produced textiles, including references to traceability technologies (e.g., RFID, blockchain) and encouraging the use of third-party certifications (e.g., GOTS, Fair Trade).
- The National Policy Statement & Roadmap on Circular Textiles should include a national implementation plan that fully aligns with the EU Strategy for Sustainable and Circular Textiles and ESPR. While the EU Textile doesn't currently assign specific lifespan figures per product, the upcoming ESPR delegated acts—targeted for adoption by 2027—will introduce concrete performance requirements for different textile categories, including durability benchmarks[39]. Delegated acts are being developed and are expected to be finalised by 2025–2027, with detailed requirements to be defined. These include testing methods and metrics for real-world lifespan performance (e.g., wash cycles, tear resistance) and must align with tools like the Product Environmental Footprint Category Rules (PEFCR) for Apparel[40]. Ireland's textile policy needs to establish a clear roadmap and binding targets to implement these requirements by 2027.
- Invest in establishing a neutral and independent data and insights research centre to 1) establish the national material flow baseline 2) identify the key issues and data gaps 3) develop evidence-based targets and actions for the Irish industry to enhance materials mix and usage, and 4) monitor progress annually. The ESPR requires a Digital Product Passport (DPP) for textiles by 2027, which will store data on material composition, manufacturing origin, environmental footprint, repair and recycling instructions, and any Substances of Concern. Furthermore, manufacturers will be mandated to disclose destruction figures of unsold goods, including microplastic data, and to ensure chemical transparency and restrict hazardous substances.

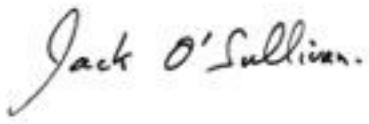
[39] "ESPR for Fashion & Textiles: Everything You Need to Know in 2025." 2025. Greenstitch.io. 2025. https://greenstitch.io/blogs/espr-fashion-textiles-2025.

[40] Carneiro , Ana , and Evelyne Keller. 2024. "ESPR Compliance for Textiles | Anthesis." Anthesis. July 30, 2024. https://www.anthesisgroup.com/insights/espr-compliance-for-textiles-future-proof-your-apparel-brand/.

- Set clear targets for funding and implementing strategic pilot projects to identify, test, and demonstrate circular recovery pathways and product applications for Irish Grown Wool and other viable bio-based fibres, such as flax. Remove regulatory barriers (e.g. reclassification under animal by-product law) and support the development of wool processing infrastructure and market innovation.

In conclusion, a well-implemented National Policy Statement & Roadmap for Circular Textiles in Ireland can be transformative. It can reduce waste, spur circular business models, and hold the fashion industry accountable for the end-of-life impacts of its products. To achieve this, the policy must be robust, with clear targets, solid data, prompt action, and an architecture that incentivises doing the right thing (designing for longevity and recyclability) while funding the necessary systems to manage textiles in a circular way. The current draft policy is a crucial starting point, but as highlighted, it should be bolstered with baseline data, metrics, and more concrete commitments. By embracing the recommendations embedded in this submission, Ireland's final policy and roadmap can **shift us from a "take-make-waste" model toward a truly circular textiles economy** – where clothing and fabrics are kept in use for as long as possible, and waste is minimized at every stage.

ZWAI is strongly supportive of the DECC's vision and approach to developing a circular economy for textiles. We believe the draft policy sets out a constructive framework, but that several important clarifications and commitments are required at this early stage to ensure successful implementation and alignment with both EU obligations and domestic priorities.



Jack O'Sullivan

Zero Waste Alliance Ireland

7th July 2025

This submission was researched and written by our members Sara Borkent Guigui, Nazia Naheed Husain, Myrtille Coutin Fitzsimons and Mary Rafferty, with further research and final editing by Orla Coutin Fitzsimons, Sara Borkent Guigui and Jack O'Sullivan.

Appendix I

Consultation

Public Consultation on draft National Policy Statement and Roadmap on Circular Textiles

From: Department of Climate, Energy and the Environment
Published on: 21 May 2025
Open for submissions from: 21 May 2025
Submissions closed: 7 July 2025
Last updated on: 21 May 2025

Consultation is open

Consultation Overview

The aim of this consultation is to seek views on a draft National Policy Statement and Roadmap on Circular Textiles. The document proposes the steps necessary for Ireland to achieve a circular economy in textiles.

Background

Current trends in textile production, consumption and post-consumption present major environmental challenges, in Ireland and globally. The textiles industry operates in a linear 'take-make-waste' model but there is great potential for a textiles circular economy as outlined in the Waste Action Plan for a Circular Economy 2020-2025.

In 2022, the Department of the Environment, Climate and Communications established a Textile Advisory Group, bringing together relevant expertise from industry, community and regulatory bodies. As part of its workplan for 2024/2025 the Department agreed to prepare and publish a National Policy Statement & Roadmap.

This draft Statement and Roadmap has been informed by insights and recommendations from the Textile Advisory Group, and other sources. It sets out a vision, common principles, strategic objectives and next steps for the future development of the textile circular economy. This draft has been informed by extensive stakeholder input including from the Environmental Protection Agency (EPA) and local government sector.

How to make a submission

The draft Policy Statement and Roadmap is available for download below, along with an Executive Summary. Submissions are welcome from organisations and individuals. We will consider all feedback before we publish the final version of the Statement and Roadmap.

PDF
Draft National Policy Statement and Roadmap on Circular Textiles
View

PDF
Draft National Policy Statement and Roadmap on Circular Textiles - Executive Summary
View

The closing date for submissions is **5.30pm on Monday, 7 July 2025.**

Submissions can be made by email to CircularEconomyConsultations@decc.gov.ie or by post to:

Appendix II

DCEE Circular Economy Consultations <CircularEconomyConsultations@dcee.gov.ie> Mon 7 Jul, 17:07 (19 hours ago)

to me

Thank you Orla,
We have received your submission to our public consultation on a National Policy Statement & Roadmap on Circular Textiles. This draft Statement & Roadmap sets out for the first time a policy direction for Ireland regarding textiles.

The consultation will remain open from May 21st 2025 for a period of six weeks till July 7th 2025. Full details are available here.

Kind regards,
Circular Economy Materials Management Division

An Roinn Aeráide,
Fuinnimh agus Comhshaoil
Department of Climate,
Energy and the Environment