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Proposed Basel Convention changes threaten textile circular economy efforts

EuRIC Position Paper

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In a [recent joint statement](#), the governments of Denmark, France and Sweden have urged the European Commission to put forward a draft Council Decision on a common EU proposal to subject textile waste to stricter control mechanisms under the Basel Convention. While their intentions may be to enhance waste management, [EuRIC Textiles](#), the textile reuse and recycling branch of the European Recycling Industries' Confederation, has major concerns about this approach, which could undermine sustainable textile recycling efforts and stifle the circular economy.

Subjecting all textile waste to the control mechanisms of the Basel Convention, and more specifically requiring prior written notification and consent for shipments of non-hazardous textile waste, could halt all circular economy efforts of the textile value chain and risk that reusable and recyclable textiles will instead be incinerated or landfilled.

Furthermore, the recent revision of the **Waste Shipment Regulation (WSR)** already imposes **stricter rules** (such as Commission approval and audited facilities) on shipments to non-OECD countries.

Subjecting these shipments to a notification procedure not only imposes a substantial administrative burden but also potentially obstructs future scalability and innovation.

Here's why:

Firstly, **non-hazardous textile waste is essential for creating an internal market for reuse and recycling in Europe**. Given that not all Member States have the capability to sort or recycle textile waste domestically, efficient transportation from collection points to sorting facilities or from sorting to recycling facilities is vital. Implementing a notification procedure would exacerbate the challenges already faced by Europe's textile [sorting](#) and [recycling](#) companies, adding to their administrative and financial burden.

Secondly, the actual problem that requires our urgent attention is not the shipment of textile waste but shipments where textile waste is disguised as used clothing and shipped outside of the controls of the waste regime. Modifying the Basel Convention codes will not put an end to this dreadful practice. To ensure that only second-hand textiles and not textile wastes are shipped outside of the waste regime, it is of utmost importance to establish a detailed sorting process prior to any shipment outside Europe. **EuRIC Textiles strongly supports the establishment of sorting criteria to ensure that only second-hand textiles are shipped outside the waste regime, to be reused** and match the requirements of the final destination.

Already in 2021, [EuRIC Textiles had established such criteria](#) outlining the collection, preparation for reuse and preparation for recycling processes in detail. Those criteria provide clear guidelines on the requirements by sorting companies in order to declare that they have successfully prepared the collected textiles for reuse. Requiring such criteria and a statement of conformity prior to any

shipment outside Europe would guarantee that shipping textile waste disguised as used clothing becomes more complicated and even impossible for unscrupulous operators.

Thirdly, the statement by Denmark, France and Sweden points out that “[i]n 2019, 1.7 million tonnes of textiles [waste] were exported outside the EU” but overlooks that this figure does not differentiate between shipments of high-quality used clothing and textile waste. As EuRIC Textiles has [continuously highlighted](#), EU product classifications for export declarations and trade statistical declarations, currently do not distinguish between textile waste and second-hand textiles, leading to major shortcomings and inaccurate export statistics.

EuRIC Textiles urges Member States and the European Commission not to change the Basel Convention codes in a way that would put a halt to any circular economy efforts of the European textile reuse and recycling industry by heightening the administrative burden without solving the actual problem.

We clearly acknowledge the **need to revise B3030 of the Basel Convention**. During the WSR revision, we strongly advocated for its amendment to encompass all apparel items, including footwear, accessories, and household textiles. This inclusion would prevent shipments of collected used clothing, accessories, and footwear for sorting from being halted as illegal shipments of mixed waste. However, **any changes to the Basel Convention must not disrupt the well-functioning of the entire textile value chain, which is a real risk if the proposal by the aforementioned countries is implemented.**