

Take-back trickery

An investigation into clothing take-back schemes





Contents

Executive Summary	3
Trackers Overview	6
1. Introduction: Take-back schemes: solution to the fast-fashion problem or greenwashing?	11
1.1 From trendy to trash: fashion's end-of-life challenges	11
<i>Box 1. Trashion</i>	12
1.2 The rise of take-back schemes	14
2. The investigation	16
2.1 Category 1: Destroyed or downcycled	17
<i>Box 2. Why downcycling is not a solution to fashion's overproduction problem</i>	25
2.2 Category 2: Resold within Europe	26
<i>Box 3. Export of used clothing to Ukraine: a helpful gesture or a burden on an already overwhelmed nation?</i>	29
2.3 Category 3: Lost in limbo	30
2.4 <i>Category 4: Shipped to Africa</i>	32
3. Conclusion and recommendations	38
<i>Box 4. EU policy/Waste Framework Directive</i>	40
Recommendations	41
References	44

The information in this document has been obtained in good faith from sources that are believed to be reliable, but any potential interpretation of this report as making an allegation against a specific company or companies named would be misleading and incorrect. All data, unless otherwise specified, is obtained from public sources, company websites, or includes company information provided directly to Changing Markets. If you represent a company that appears in this report that you believe is not correctly represented, supplemental information can be sent to contact@changingmarkets.org. The authors accept no liability whatsoever for any direct or consequential loss arising from the use of this document or its contents.

This report was researched and written by the Changing Markets Foundation.



www.changingmarkets.org

Design: Pietro Bruni - toshi.ltd
Published in July 2023

Executive Summary

Take-back schemes are presented as a convenient option for consumers to return their unwanted clothes directly to fast-fashion brands and retailers, who promise to give them a second life, either by donating to those in need or recycling into new clothing. For example, C&A promises to ‘give your clothes a second life’, H&M says ‘Let’s close the loop’ and The North Face ‘Let’s complete the circle.’

But to what extent are these take-back schemes delivering on their promises and effectively addressing the systemic waste issues generated by the fashion industry? This investigation, conducted between August 2022 and July 2023, set out to trace items submitted to these take-back schemes, to establish what actually happens to clothing beyond the deposit bin.

Through discreet airtag trackers concealed within clothing, we tracked, in real time, 21 items submitted to ten fashion brands (H&M,

Zara, C&A, Primark, Nike, Boohoo, New Look, The North Face, Uniqlo and M&S) at their stores in the UK, France, Belgium and Germany. All clothes returned in this way to the brand's take-back schemes were of good quality, originally bought from second-hand clothes shops, and therefore considered suitable for reuse.

After 11 months of tracking, the outcomes of the tracked items expose the discrepancy between brands' claims and the actual fate of the collected clothing. We categorised the journey of the trackers into four groups: resold within Europe, downcycled (where clothing material is turned into other products of lower quality such as stuffing) or destroyed, lost in limbo (for clothing stuck in collection containers or along the way), and shipped to Africa.

1. Downcycled or destroyed

Seven items were quickly destroyed, dumped or downcycled, either as stuffing, cleaning cloths or in one case burned for energy in a cement plant. This was despite the items being in good condition and the fashion brands asserting they consider downcycling or burning for fuel only for items not suitable for reuse or recycling. One pair of trousers in perfect condition dropped off at M&S in the UK was downcycled at a Veolia plant within one week. Three items in great condition were likely shredded at a SOEX facility in Germany, rather than being diverted for reuse or resale. One of these was pair of trousers in excellent condition with a clothing tag still attached, originally deposited in C&A's collection bin in France. This shows a failure of brands and their contractors to properly sort clothing that gets returned through take-back schemes, indicating a disregard for the waste hierarchy, which prioritises prevention and reuse before recycling, let alone downcycling.

2. Resold within Europe

In total, five items of clothing found a second life either in a second-hand shop or with a customer on the same continent. Only one of the items was resold in the same country where it was initially deposited, a shirt returned to Zara's Oxford Street shop in the UK. Two items travelled to Ukraine for resale. While the possibility that these found a second home is promising, the trade of used clothing in Ukraine was found to be something of a poisoned chalice, adding to the burden of waste experienced by a country at war.

3. Lost in limbo

Multiple items became ensnared in the global used clothing trade, lingering for months in indeterminate locations and warehouses, or in some cases never leaving their original drop-off location. In these cases, take-back schemes are clearly failing to meet the goals communicated by brands. Whereas customers would assume that the clothes they drop off are reused or recycled into new clothes in a reasonable timeframe, in fact they have been left to languish in warehouses across Europe for up to a year. The brands have benefited from the reputational gains of operating a take-back scheme without having done anything at all with these clothes.

4. Shipped to Africa

The most contentious category was clothing that ended up shipped to Africa. Here, items entered massive second-hand clothing markets in countries with inadequate waste management systems for handling market refuse, resulting in a significant portion being bound for landfill or burned. Two C&A items and two H&M items were in this category, travelling to the Democratic

Republic of the Congo, Mauritania and Mali. An olive green skirt deposited at H&M's London store took a five-month, 24,800km journey, through the United Arab Emirates SOEX processing facility and later to Bamako, Mali, where it was eventually tracked to a vacant lot, suggesting possible dumping or discarding. Multiple investigations in African countries into the issue of textile waste and used clothing imports, including our own, have revealed that 20-50% of clothing imported through second-hand trade ends up as waste. It is highly concerning that brands' take-back schemes are directly contributing to this problem.

Beyond the brands, several companies emerged as key players deciding the fates of clothing within the system. The first is SOEX, a global collection, sorting and recycling company with partnerships with many of the brands in the investigation. Six items passed through SOEX sorting and recycling facilities in Germany and its Middle East processing unit in the UAE. Despite being in good, resellable condition, three of these items were shipped to Africa and the remainder were downcycled, suggesting the company focuses more on waste disposal and sending the problem elsewhere than finding new homes for items in Europe. Another company is ReSales Textilhandels- und -recycling GmbH, part of the TEXAID group. Two items went through this company: one was burned for fuel at a cement plant and the other was shipped to Mauritania.

As we have discovered, beyond the slick marketing of take-back schemes, the final destination of these clothes is far messier than brands would like their customers to think. Promises that items will be reused or recycled ring hollow, with evidence from our investigation suggesting that items in pristine condition are mostly shredded and downcycled, or shipped tens of thousands of kilometres across the world. These schemes offer consumers a false sense of environmental responsibility, tricking them into thinking that they are making a responsible choice.

Many take-back schemes compound the problem by offering vouchers, discounts or member points for customers to immediately purchase more products. In fact, for 13 out of 21 items tracked, some form of discount or voucher is provided by the fashion brands. In this way they are perpetuating the very model of fast fashion that drives excessive consumption and waste, without addressing the systemic issues, like moving away from the wasteful fast-fashion model or investing in innovative fibre-to-fibre technologies.

The fashion industry is at a critical crossroads. For the first time ever legislators have started to address its environmental performance, specifically its huge and growing waste problem. On 5 July 2023, the European Commission published a revised Waste Framework Directive that proposes an EU-wide extended producer responsibility (EPR) system, which will make fashion brands pay fees for every product they put on the market to cover the costs of end-of-life collection, sorting, recycling and responsible disposal. In addition to this, the proposal is taking a first step to control exports of used clothing to the Global South. All used clothes will be considered as waste under the proposed rules, until they are professionally sorted. As critical legislation gathers pace in the EU to regulate the waste trade and the life of the clothes we throw out, it is vital that the role of take-back schemes in this system is properly understood and integrated in the legislation. Our findings show that brands have very little traceability and control over what happens to the clothes returned even in the schemes they operate. Producer responsibility must include and finance proper sorting and investments into better end-of-life management. The legislative proposal must also be improved to include mandatory reuse and recycling targets, as well as upstream measures that lead to the reduction of overproduction (by taxing synthetic fibres) and mandatory eco-design criteria.

This report includes a set of policy and company recommendations.

Trackers overview



Resold



Stuck in a warehouse



Downcycled



Burned



Shipped



















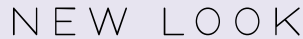






























Shredded


















Dumped

Clothing image	Fibre composition	Drop-off country (flag)	Company operating take back scheme	Final destination	Distance travelled (km)	Company Claims	Voucher or discount offered.
	Belt: 100% polyester Trousers: 73% polyester 24% viscose 3% elastane	France 		Downcycled at SOEX Germany 	801	Collection box in the store claims 'We give your old clothes a second life' and that all textiles will be carried forward, reused or recycled. Its website states that 'We take it back' clothing collection programme is a step forward in a journey towards circular fashion. It claims that the majority of collected clothes can be reused, and those that cannot be reused will be downcycled as insulation material in the automotive industry. Few of the clothes that cannot be recycled will be burned as fuel to produce energy.*	10% discount
	93% cotton 5% elastomultiester 2% elastane	France 		Downcycled at SOEX Germany 	874	See C&A above	10% discount
	57% polyester 43% cotton	France 		Resold in Slovakia 	1,142	Collection box claims: "Let's close the loop" and that clothes will be reworn, reused or recycled. According to the company website, wearable clothes will be marketed as second-hand clothing. If they are not suitable for rewear, they will be turned into other products such as cleaning cloths. All other textiles will be shredded into textile fibres and used to make for example insulation materials.**	10% discount
	100% polyester	France 		Stuck in a warehouse 	38	Collection box in the store claims 'Bring the clothes you no longer wear and give them a second life'. According to the company's website collected clothing is given to local organisations for sorting. Garments are then donated to people at risk of exclusion, sold in second-hand stores or recycled.****	

Clothing image	Fibre composition	Drop-off country (flag)	Company operating take back scheme	Final destination	Distance travelled (km)	Company Claims	Voucher or discount offered.
	83% cotton 15% polyester 2% viscose	Germany 	H&M 	Shredded in Czechia 	283	See H&M above	10% discount
	69% polyester 29% viscose 2% elastane	Germany 	C&A 	Burned for fuel at a cement plant 	464	See C&A above	10% discount
	100% polyester	Germany 	ZARA 	Never moved 	0	See Zara above	
	100% polyester	Germany 	NIKE 	Resold in Ukraine 	2,443	Collection box in store claims "Move to zero. Recycling, donation. Donate, instead of throwing away. We will clean, donate or recycle your worn item, giving it a second chance." According to the company's website, product is either cleaned and donated or sent away for recycling. It also claims that Nike helps keep materials out of landfills.*****	
	92% polyester 2% elastane	UK 	NEW LOOK 	Take-back scheme not operational	0	According to the company's website, donated clothes are processed by Re-Fashion, which will resell them or recycle them, giving items a second life.*****	15% discount
	100% polyester	UK 	ZARA 	Resold in the UK 	448	See Zara above	

Clothing image	Fibre composition	Drop-off country (flag)	Company operating take back scheme	Final destination	Distance travelled (km)	Company Claims	Voucher or discount offered.
	100% polyester 100% goose down insulation	UK 		Never moved 	0	The company's website states: 'Bring your gear full circle'. It states that returned items will be washed, tuned up and resold through The North Face Renewed, donated or recycled.*****	£10 voucher
	98% cotton 2% elastane Lining 100% polyester	UK 		On vacant lot in Bamako, Mali 	24,892	Sign in store says: 'Let's close the loop..... You can recycle any textiles from any brand with us. Yes, even an old pair of socks or a tattered towel!' See H&M above.	10% discount
	69% Polyester 29% viscose 2% elastane Lining 100% polyester	UK 		Resold or second-hand shop in Belarus 	2,680	REGAIN app that Boohoo uses states 'Turn your unwanted clothes into discount coupons' and 'Make fashion circular'. The site encourages consumers to contribute 'to the creation of circular fashion by getting your old clothes reused, recycled or remade into new products.'*****	Discount coupons
	94% polyester 6% viscose Lining 100% polyester	UK 		Resold or second-hand shop in Ukraine 	2,676	Collection box talks about reuse, specifically about donating clothing to refugees and others in need and promoting product-to-product recycling. According to the company's website, clothing gets reused, recycled back to clothing, or only in Japan, downcycled or used for fuel.*****	
	Shell: 60% cotton 40% polyester Rib: 58% cotton 39% polyester 3% elastane Hood lining: 60% cotton 40% polyester	UK 		Dumped in a skip in an industrial estate 	2,346	Collection box says 'Let your pre-loved be re-loved. Recycle any clothing or textiles here whatever the brand or condition.' According to the company's website, it prevents clothes from going to landfill. It partners with Yellow Octopus, a recycling specialist, which sorts the clothing to be reused, with the remainder repurposed into new products such as toy stuffing and insulation.*****	
	100% polyester	UK 		Downcycled in Ukraine 	2,578	See Uniqlo above	

Clothing image	Fibre composition	Drop-off country (flag)	Company operating take back scheme	Final destination	Distance travelled (km)	Company Claims	Voucher or discount offered.
	100% polyester. Exterior 100% nylon	UK 	ZARA	Stuck in a warehouse in Lithuania 	2,224	Donate clothes you no longer wear and give them a new lease of life (collaboration with British Red Cross)	
	93% polyamide 3% elastane	UK 	H&M	Sent to a market in Bamako, Mali 	24,892	See H&M above	10% discount
	100% polyester	UK 	M&S	Destroyed or downcycled in UK 	69	M&S partners with Oxfam to process donations, which will either resell or reuse donated clothing. Clothing it cannot resell will be 'recycled' into new items, such as mattress fillings or carpet underlay.***	Reward points
	100% polyester	Belgium 	C&A	Shipped to Mauritania 	5,461	See C&A above	10% discount
	78% cotton 19% polyamide 3% elastane	Belgium 	H&M	Sent to a market in Kinshasa, DRC 	11,429	See H&M above	10% discount

**https://www2.hm.com/en_gb/sustainability-at-hm/our-work/close-the-loop.html

***<https://www.marksandspencer.com/c/plan-a-shopping>

****<https://www.zara.com/uk/en/preowned-donate-mkt5798.html>

*****<https://www.nike.com/gb/sustainability/recycling-donation>

*****<https://www.newlook.com/uk/sustainability/re-fashion>

*****<https://www.thenorthface.co.uk/take-back.html>

*****<https://regain-app.com>

*****https://www.uniqlo.com/jp/en/contents/sustainability/planet/clothes_recycling/re-uniqlo/

*****<https://www.primark.com/en-gb/a/inspiration/sustainable-fashion/let-your-pre-loved-be-re-loved>

Brands Routes



boohoo



M&S



ZARA



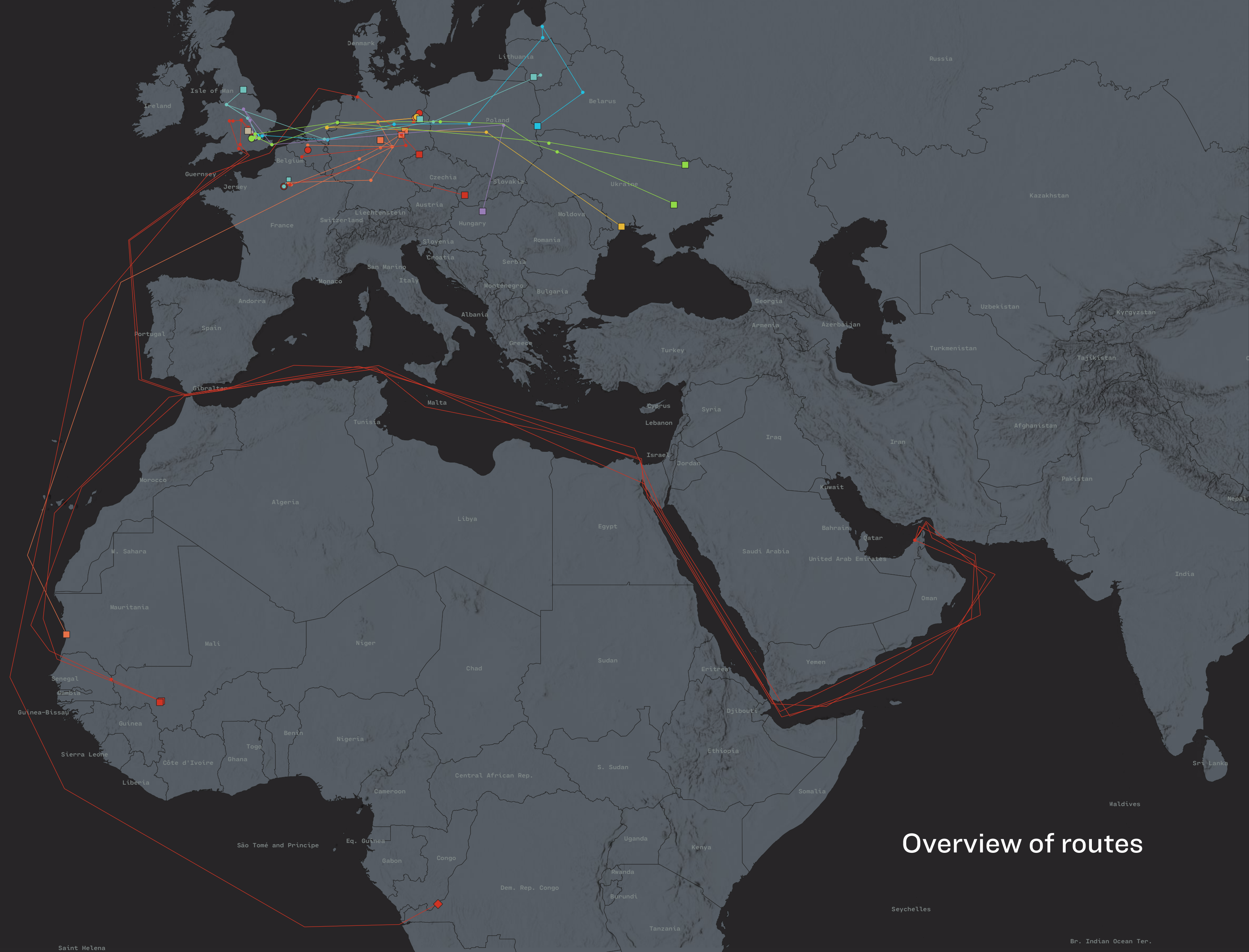
PRIMARK



Start

Journey

Destination



Overview of routes



1. Introduction: Take-back schemes: solution to the fast-fashion problem or greenwashing?

1.1 From trendy to trash: fashion's end-of-life challenges

Fast fashion has dramatically altered the clothing industry, offering cheap garments that cater to ever-changing fashion trends. However, beneath the allure of low prices and rapid fashion cycles lies a major environmental crisis, as well as exploitation of workers. Fast fashion's disposable approach undermines the concept of a circular economy, which aims to minimise waste and maximise the lifespan of products through reusing, repurposing and recycling. Fast fashion's trend-led model thrives on the rapid production of low-quality garments that are designed to be worn for a short period and then thrown away, filling up landfills or incinerators.

It is no secret that fast fashion relies heavily on synthetic materials made from fossil fuels. Synthetics, which currently account for two-thirds (69%) of textiles, have become the foundation for low-quality clothing that make recycling and reuse ever more challenging. The accumulation of discarded synthetic clothing further exacerbates fashion's environmental impact as these fibres do not biodegrade but persist in the environment. They also shed microplastics throughout their lifetime, which make their way into the marine environment, soil, and human and animal bodies.

Sadly, the majority of discarded garments are not reused due to their poor quality or lack of demand for second-hand clothing. According to McKinsey, the average consumer buys 60% more clothes than they did in 2000, but keeps them half as long. Some consumers treat the lowest-priced garments as nearly disposable, discarding them after just seven or eight uses.¹

While the concept of textiles recycling holds promise, recycling technologies are still in their infancy, with less than 1% of used clothing turned into new clothing today. A 2017 report by the Ellen MacArthur Foundation, with modelling by McKinsey, estimates that more than half of fast fashion produced is disposed of in under one year and that almost all of it - a staggering 87% - eventually ends up in landfill, dumped or otherwise destroyed.² Fibre-to-fibre recycling also suffers from a lack of investment by fashion brands and fibre producers. Although this could slowly change due to upcoming legislation, it is unlikely that we will ever be able to recycle the huge quantities of low quality clothes that fashion brands are churning out every day.

As a result of the fast-fashion trend and the resulting proliferation of cheap synthetic clothing, a declining proportion of clothes is suitable for second-hand sale in the country where it is collected. Of the approximately 25% of clothes that are 'reused'

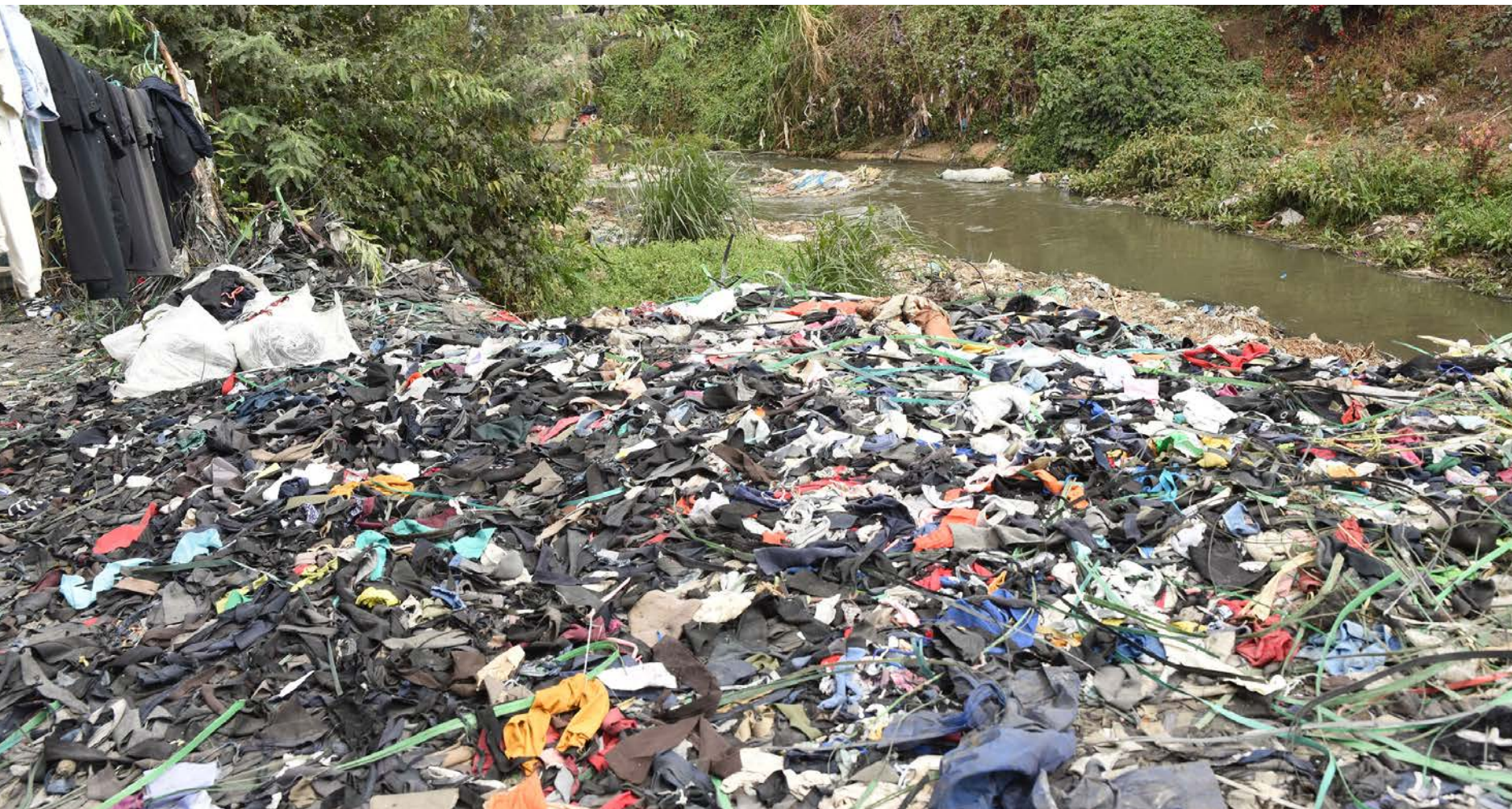
or resold, 75% is destined for other countries, causing a waste problem and placing an enormous burden of plastic pollution on the Global South.³

Box 1. Trashion

Our own on-the-ground investigation, conducted in 2022 and published in 2023, delved into the trade in used clothing at one of its key destinations: Kenya. The amount of second-hand clothing flowing to Kenya from global sources has grown significantly in recent years, a torrent that amounts to 17 garments for each Kenyan every year, up to 8 of which are waste from the start.

We found the system of used-clothing trade to be at breaking point, with over 900 million items sent to Kenya from around the globe in 2021. Out of these, nearly 150 million items came from the European Union (EU) and the United Kingdom (UK). Of the 112 million items of used clothing shipped directly from the EU to Kenya each year, up to one in three contain plastic and are of such a low quality that they are immediately dumped in the environment or burned. Our investigation established that 20-50% of clothing ending up in second-hand markets in Kenya is of such low quality, damaged, stained or otherwise unsellable, that it almost immediately becomes waste. Much of it also is made of plastic, adding to fashion's significant plastic pollution impacts.

This toxic influx is creating devastating consequences for the environment and communities. Testimonies from on the ground showed how the mountains of textile waste overwhelming communities and ecosystems originate from well-known brands in the Global North, including those subsequently found in our trackers investigation to be sending clothing to countries in Africa through their take-back schemes.



The banks of the Nairobi River consisting of textile waste |



Textile waste embedded into the soil surrounding Kawangware dumpsite in Kenya |

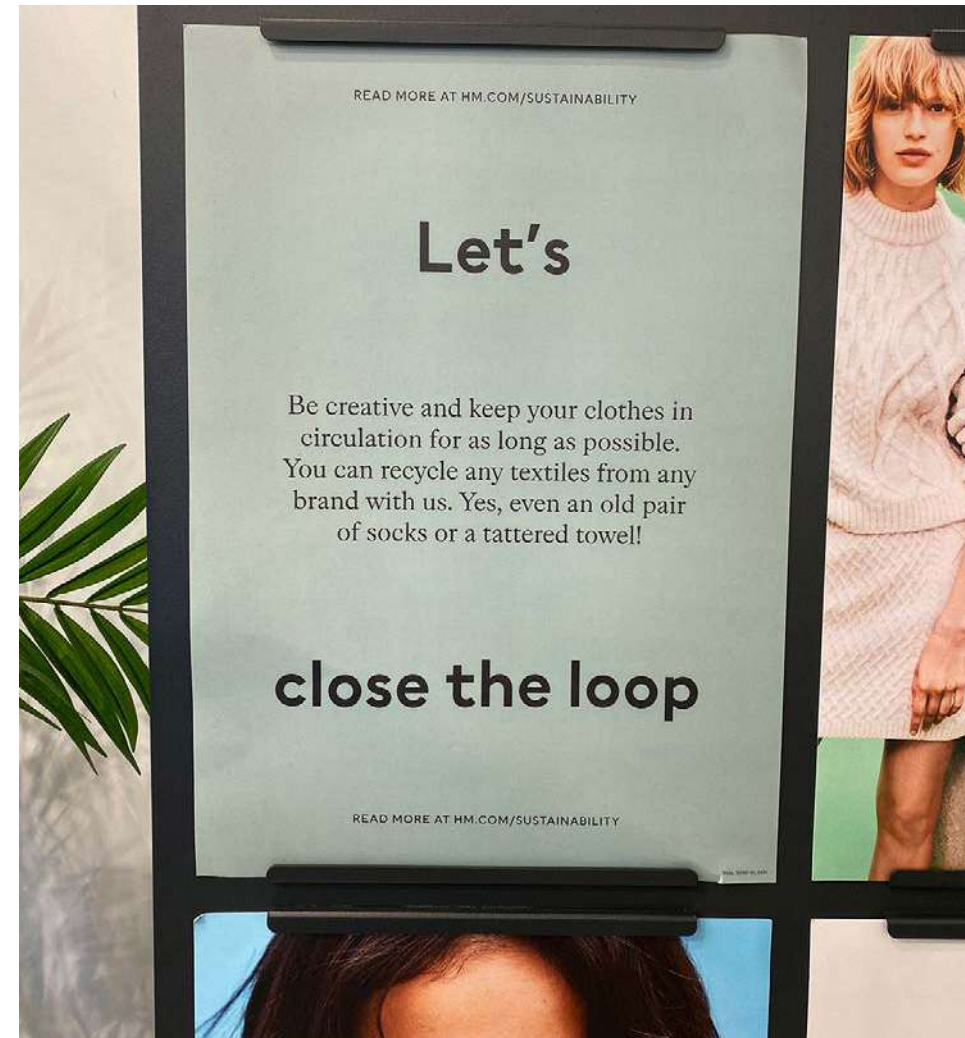
1.2 The rise of take-back schemes

In a bid to demonstrate a move to a circular model, an increasing number of brands are deciding to establish take-back schemes, where consumers can return their used clothes. WRAP reported that the number of in-store and online take-back schemes doubled between 2021 and 2022.⁴

Most often this is in the form of collection containers found in stores, which indicate that collected clothes will be reused or recycled. For example, on their collection containers, Zara and C&A state that collected clothes will be given a new or second life. Nike's containers indicate that clothes will be donated or recycled, while H&M's message states that clothes will be worn, reused or recycled. The containers in M&S's stores indicate that collected clothes are given to Oxfam, to be resold, reused or recycled. All these statements are designed to sway consumers' opinions, making them believe that they are making a conscious and generous gesture, diverting their old clothes from landfill or incineration and possibly helping people in need.

Concerningly, few - if any - of these brands oversee what happens to the clothes after they have been collected. Some brands partner with charity organisation or commercial partners (M&S with Oxfam; H&M with Remodis⁵; Tesco F&F with SOEX UK; Zara with several non-profit organisations, including the British Red Cross, Caritas Spain and the Salvation Army;⁶ ⁷ and C&A with Texaid⁸), shifting responsibility for reuse and recycling and having no direct overview of what happens to collected items. A recent report by Fashion Revolution revealed that just over a quarter (28%)

| Take-back scheme's collection boxes and signs in stores

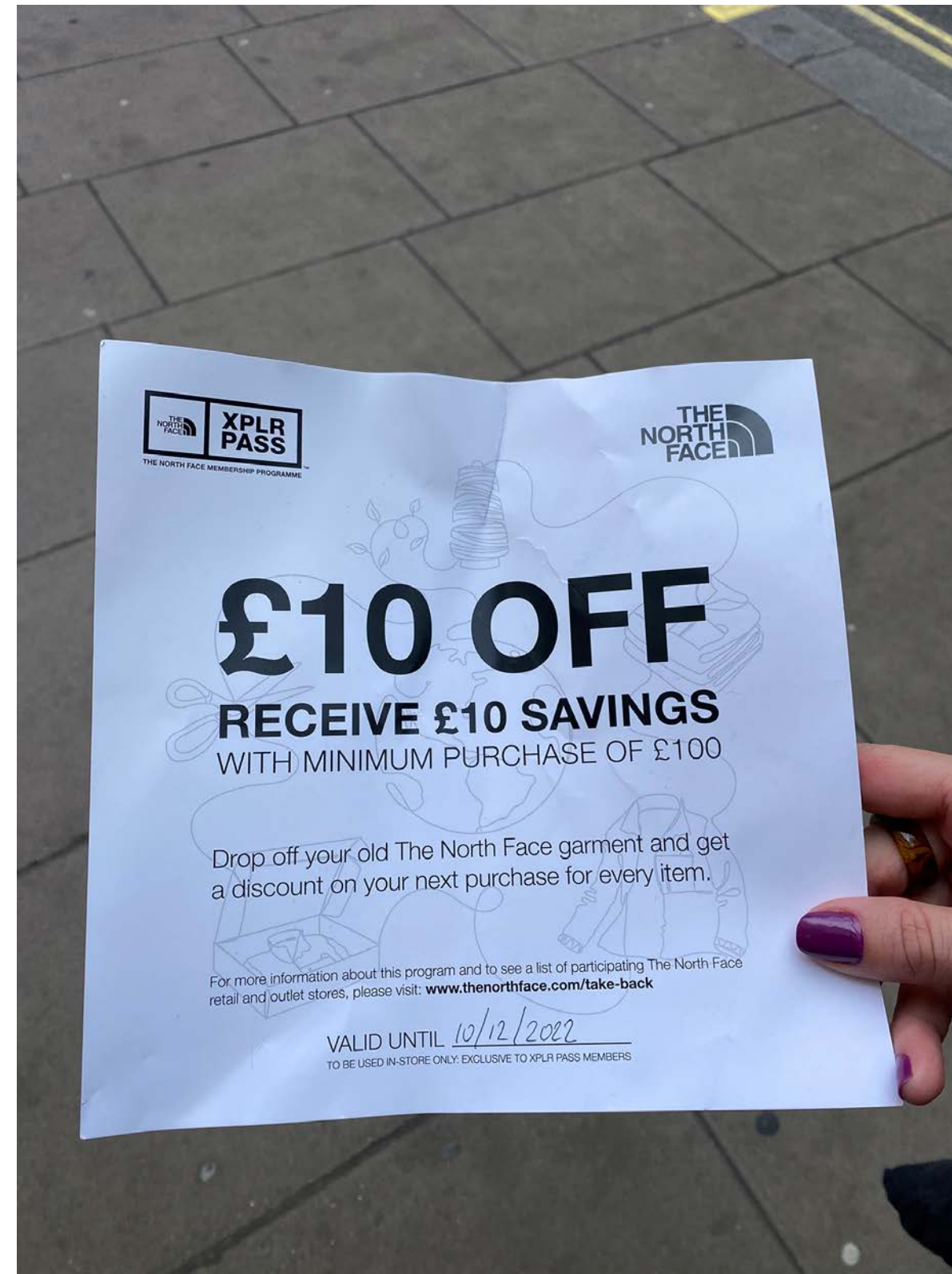


of companies operating a take-back scheme disclose what happens to collected clothing, for example how much is resold locally, resold into other markets, down-cycled, upcycled, recycled into new textiles, and so on. This lack of visibility and transparency is highly concerning.

In reality, the fate of collected used clothing is far from what consumers are led to believe. A recent investigation by the Swedish newspaper *Aftonbladet*, for which Changing Markets shared our methodology, tracked garments collected in H&M's take-back containers in Sweden. The investigation revealed that the collected garments are downcycled or travel thousands of miles before they are dumped in countries in the Global South, in this case India and Ghana, contributing to mountains of textiles waste.⁹

Not only do take-back schemes fail to guarantee that collected clothes are recycled or reused, but many encourage shoppers to buy more cheap clothes. A number of brands, including H&M,¹⁰ C&A,¹¹ The North Face¹² and reGAIN¹³, used by Boohoo, offer discounts when customers hand in old clothing, while Adidas offers a gift card and adiClub points,¹⁴ and H&M offers member points. A consumer survey by WRAP found that 15% of respondents who had disposed of an item via a retailer take-back scheme always bought new garments at the time of dropping off their unwanted clothing items, and a further 20% often did so.¹⁵ This suggests that such schemes can encourage further consumption.

While take-back schemes may appear to promote sustainability and responsibility, they are often a form of greenwashing, allowing brands to maintain a positive image without making significant changes to their unsustainable business model or moving away from their reliance on fossil-fuel based synthetics.



| Several brands offer vouchers, discounts or member points for bringing used clothing



2. The investigation

Our investigation was carried out over a period of 11 months between August 2022 and July 2023 using a combination of desk-based research, trade data analysis, monitoring and tracking software, and on-the-ground deployment and corroboration of findings with partner organisations.

As part of the investigation we purchased 21 items of clothing from vintage and charity clothes shops. All the items were in good condition, without any visible damage. They were purchased second-hand to reflect a realistic scenario in which consumers would return clothes suitable for reuse. Some of the clothes bought from online second-hand retailers or charity shops were like new, and even had the original tags on. In addition to this, we used a variety of other criteria to decide which clothing items to choose:

- Items from brands with take-back schemes in the investigation so that, where possible, we could use clothing made by the same brand.
- Items which allowed us to conceal trackers within the fabric, e.g., in hems or collars, where they could not be easily detected.
- Items containing at least some level of synthetic fibres, such as polyester, nylon and elastane, as this is representative of the fibre mix of fast-fashion items on the market.

The trackers we used for locating items were airtags, comprising small discs easy to conceal within clothing. These were tracked from investigators' phones; the technology uses Bluetooth connections within proximity to the tracker to determine its location. This technology did not provide historical tracking data, so locations had to be recorded periodically by the team.

From these 21 items, 4 were deposited with take-back schemes in France, 11 in the UK, 4 in Germany and 2 in Belgium. Clothing was handed over in stores in London, Brussels, Paris and Berlin, at H&M, Primark, M&S, C&A, North Face and Zara stores, while postal take-back schemes (Boohoo and New Look) were deployed from the UK.

Tracker data was collected on a daily basis and any locations cross-referenced with desk-based research and on-the-ground visits where possible. For privacy purposes, any item which we could establish had been sold or entered a residential address was disabled at that point and no residential addresses have been disclosed publicly. Upon conclusion of the investigation, all trackers have been disabled.

To present our findings, we have divided the tracked items into four categories that illustrate their journey and ultimate fate.

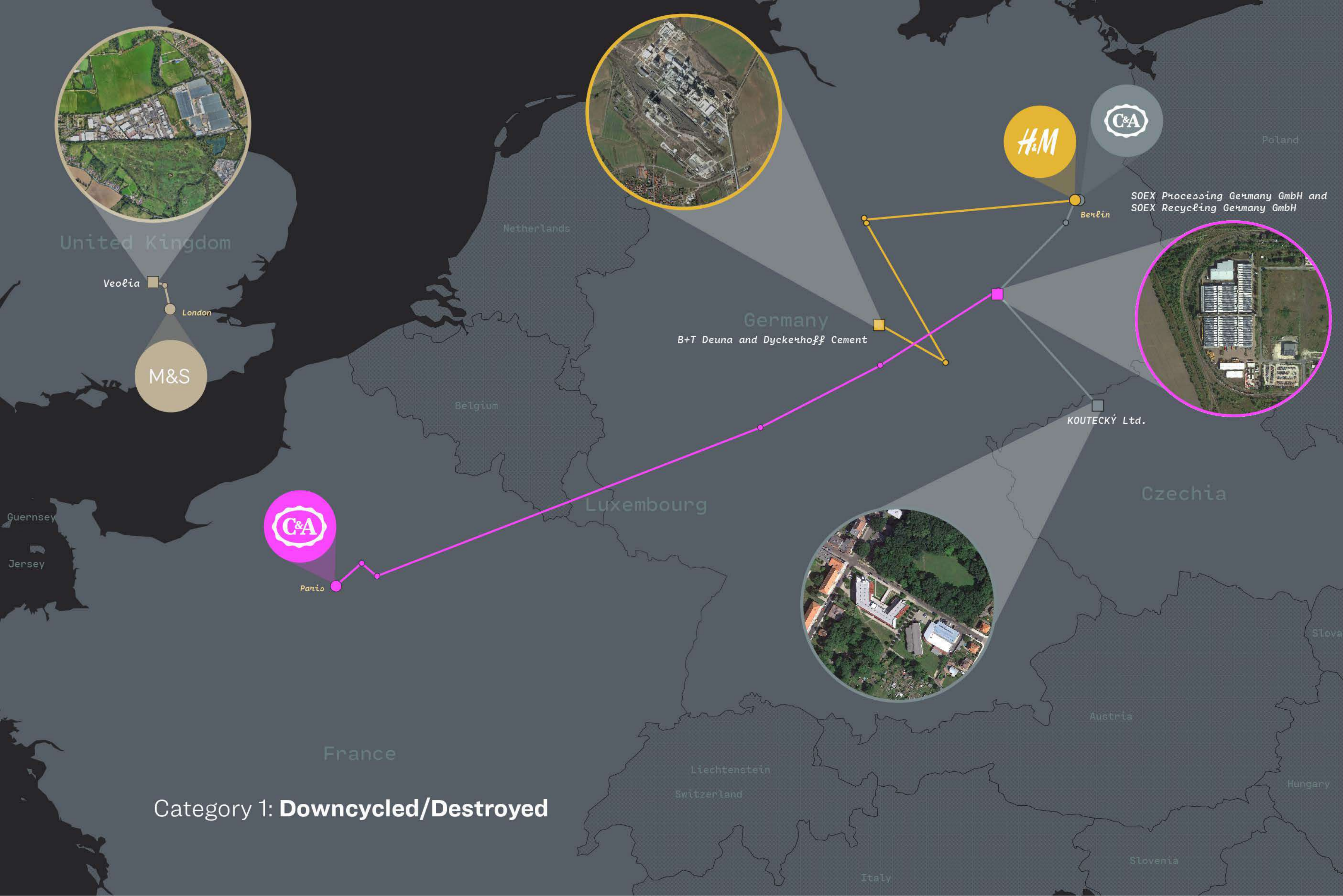
2.1 Category 1: Destroyed or downcycled

We conclude that at least seven items of clothing in our investigation were destroyed, dumped or downcycled. Downcycling is a process in which textiles are shredded to create items of lower value - such as insulation materials, cleaning cloths or chair padding.

According to our data, Germany emerges as a crucial final destination or a transit hub in the downcycling process. It is where many of the garments met their demise.

Three case studies with a common denominator, SOEX processing plant in Bitterfeld-Wolfen, Germany, highlight the disappointing fate of clothing items in excellent condition. Despite being dropped off in two different countries, all three items underwent processing at the SOEX facility in Germany, leading to their downcycling or destruction.

- SOEX is a specialised facility focused on the collection and sorting of used textiles. According to its website the company deals with trade of used clothing and processing of unwearable used textiles into secondary raw materials.¹⁶ It states that once garments have undergone SOEX's sorting procedure and are deemed non-reusable, they are mechanically recycled to be used for products in various industries, primarily in the automotive and construction industries.¹⁷



Category 1: **Downcycled/Destroyed**



United Kingdom
Veolia
London
M&S

C&A
Paris

Germany
B+T Deuna and Dyckerhoff Cement

H&M

C&A

SOEX Processing Germany GmbH and
SOEX Recycling Germany GmbH

KOUTECKÝ Ltd.

Luxembourg

Czechia

France

Liechtenstein
Switzerland

Italy

Slovenia

Hungary

Slova

Poland

Netherlands

Belgium

Guernsey

Jersey



| Beige trousers donated to C&A in France

In one case, a new pair of trousers from Zara, deposited in C&A's collection bin in Paris, was within a week transported to the SOEX processing plant in Bitterfeld-Wolfen. Despite being in excellent condition with a clothing tag still attached (see photo), the tracker went off at this facility, indicating that within a month of drop-off, the trousers were destroyed, likely shredded, at the facility, rather than being diverted for direct reuse or resale.

Similarly, a pair of jeans, also deposited at the same C&A store, followed the same path and arrived at the SOEX facility in Bitterfeld-Wolfen. However, they remained there for seven months before being shredded.

This is at odds with C&A's claims surrounding its 'We take it back' clothing collection programme, which stipulates that it is a step forward in a journey towards circular fashion. It encourages consumers to hand over their used clothes in order to 'give them a new life and do something responsible'. It claims that the majority of clothes submitted to its take-back scheme can be reused, and those that cannot be reused are downcycled as insulation material in the automotive industry. The few that cannot be recycled are burned as fuel to produce energy.¹⁸

This is also worrying considering France is currently the only country with an operational extended producer responsibility (EPR) system for textiles, which includes collection, sorting, recycling and reuse targets. However, the example mentioned highlights a deviation from the waste hierarchy, which prioritises prevention and reuse before recycling, let alone downcycling. For this new item in pristine condition, reuse was overlooked in favour of immediate downcycling.

Similarly, an H&M sweater in good condition, dropped off in H&M's collection bin in Berlin, travelled to the same SOEX processing plant and later to the Czech Republic. The tracker stopped in May 2023 at Koutecky Ltd in Duchcov, Czech Republic, a company operating landfills, waste disposal and downcycling of textiles waste.¹⁹

According to public sources, the company gathers textiles from collection bins and downcycles them for use in various industries, including the automotive, engineering, construction, hygiene materials and other industries.²⁰ While the sweater had potential for reuse, its journey ended with downcycling or disposal in landfill. This goes against H&M's claims about what happens to clothes dropped off in what it refers to as 'recycling boxes'. According to the company's website, wearable clothes will be marketed as second-hand clothing. If they are not suitable for rewear, they will be turned into other products such as cleaning cloths. The last option, which H&M refers to as recycling, is in fact downcycling, where 'textiles are shredded into textile fibres and used to make for example insulation materials.'²¹



| Grey sweater dropped off at H&M in Germany



| Jogger pants dropped off at C&A in Germany



B+T Deuna's facility at Dyckerhoff Cement
Credit: Google Earth

The fate of both items processed through the SOEX facility raises concerns about missed opportunities for reusing perfectly wearable clothing. Despite both C&A and H&M mentioning the option of downcycling, they state this is only for items not in reusable condition. SOEX processes clothes on behalf of I:CO, its waste collection network that operates take-back systems for clothing and shoes in over 60 countries.²² It partners with dozens of fashion brands, including American Eagle, Levi's, The North Face and Puma,²³ so the scope of garments passing through the SOEX facility and ultimately being shredded or destroyed is likely to be even wider.

Another example involves a pair of joggers that were initially deposited in a C&A store in Berlin. These trousers moved within the country, being sorted at ReSales Textilhandels- und -recycling GmbH, part of the TEXAID group,²⁴ and eventually ended up at B+T Umwelt, a major waste-to-alternative-fuel producer in Germany.²⁵ The B+T plant where the joggers ended up operates next door to Dyckerhoff's Deuna cement plant.

| Credit: Dyckerhoff





| Floral Pants donated to M&S in the UK

At the B+T plant, waste sorting takes place, including the handling of mixed polyolefins (multilayer plastics) from German households, as well as plastic waste from industrial production, including carpets, textiles, and bulky waste. The waste undergoes a process that involves sorting, removing PVC, metals and organics, and shredding it into a material called ‘fluff’. This fluff is then transported via an outdoor air conveyor belt to Dyckerhoff’s cement facility, where it is used as fuel in burning chambers and blown into the kiln.²⁶

All evidence indicates that the trousers, in good condition, were shredded and burned as fuel, disregarding the value of the resources and labour invested in producing the garment, and potentially creating harmful emissions and incineration by-products in the process. Although C&A indicates on its website that ‘few of the clothes that cannot be recycled’ will be burned for energy, items in reusable condition should not meet this fate.

Downcycling takes place outside of Germany too, as our last two examples demonstrate. After being deposited in M&S’s Oxford Street store in London, a pair of floral trousers in like-new condition underwent a swift journey. Within just eight days the tracker lost signal in a Veolia plant in St Albans, which operates as a commercial waste depot, according to its website.²⁷ As Veolia provides recycling and disposal services, it is clear that within just a week of drop-off, the trousers were shredded or downcycled within the UK. In stark contrast, M&S’s website states that the company partners with Oxfam, which will either resell or reuse donated clothing. It states that clothing Oxfam cannot resell will be ‘recycled’ into new items, such as mattress fillings or carpet underlay. In this case the trousers were not even given a chance of resale and were shredded within a week.²⁸



| Veolia's plant in St Albans, UK

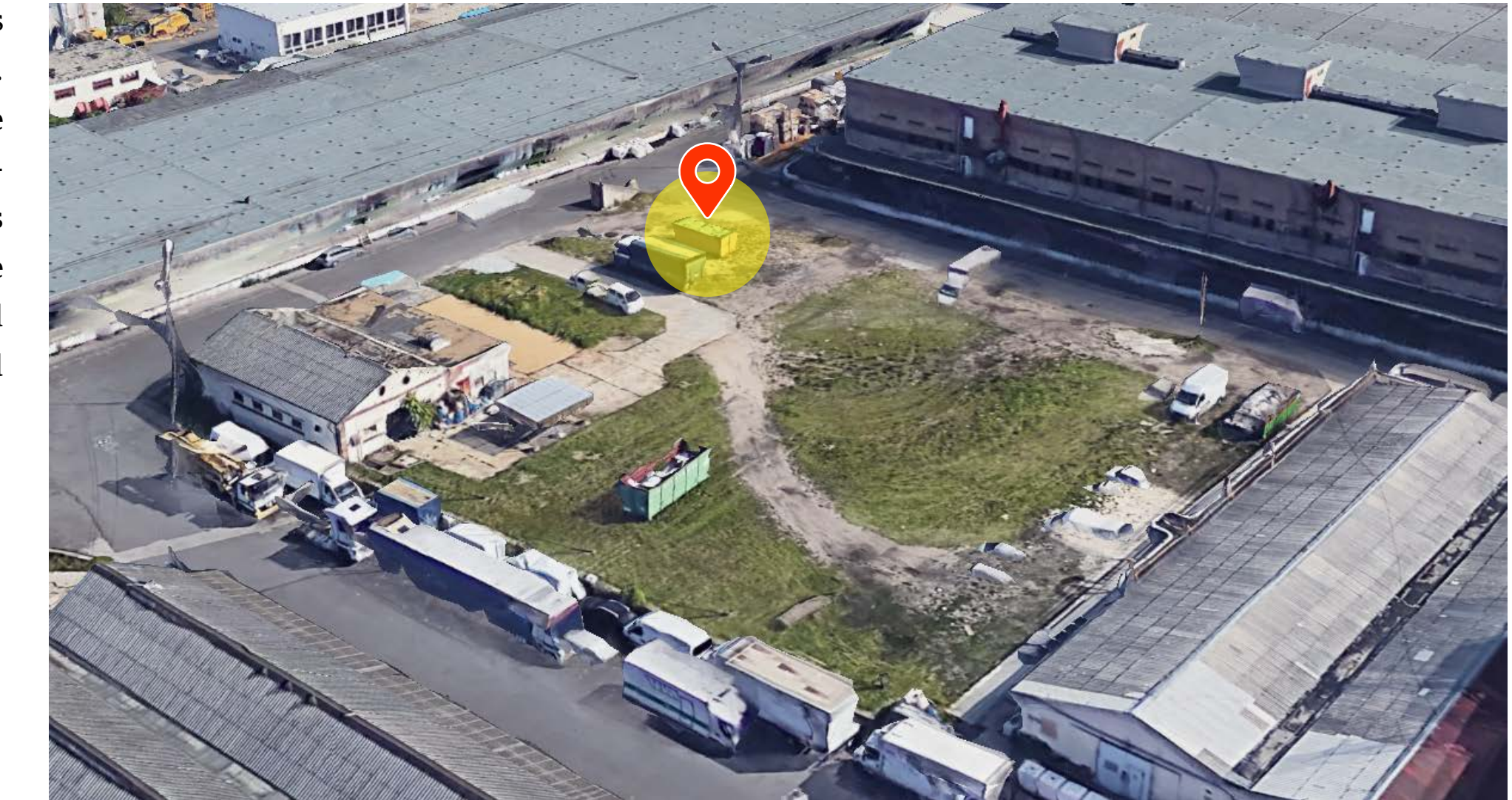
A coat given to Uniqlo's Regent Street store in London spent five months in a warehouse in the UK before being sent through Europe to Kharkiv in Ukraine. The item passed through several second-hand clothing-related businesses in the city before leaving for an industrial complex on the outskirts in a warehouse we assessed to belong to YukraPlast, which deals in 'textile products'.²⁹ The fact that the item passed through multiple second-hand shops without being resold suggests it is destined for downcycling at this plant.

Lastly, an item deposited in the UK seems to have been simply dumped after its journey of four months. A grey hoodie in great condition given to Primark travelled through Europe via Yellow Octopus in Komorow, Poland, before stopping for many months without moving at a vacant lot on an industrial site outside Budapest, Hun-



| A coat given to Uniqlo

gary. Satellite imagery shows the plot in question contains several metal containers, suggesting the item was dumped. This contradicts Primark's claims that its take-back scheme prevents clothes from going to landfill. The company partners with Yellow Octopus, a recycling specialist, which sorts the clothing, enabling Primark to claim that garments are reused. It says that clothes that can't be reused are recycled or repurposed into new products such as toy stuffing and insulation.³⁰



| The plot outside Budapest, Hungary

What the above examples show is that many perfectly usable items, some in excellent condition, are being needlessly destroyed, downcycled or dumped. Shockingly, one of these garments was destroyed within a mere week after being dropped off. It appears that for these items, take-back schemes are operating as one end of a well-oiled textile waste disposal system, whereby the value of reuse and extending the garment's lifespan is entirely overlooked in place of rapid disposal and downcycling.

Even if some of these items end up downcycled into items of lower value, this falls far short of what consumers were led to believe when they entrusted their used clothing to companies' take-back schemes. Brands continuously advertise the promise of reuse or recycling, concealing the general reality of the downcycling that involves breaking down garments into lower-value materials or components.

| A grey hoodie given to Primark

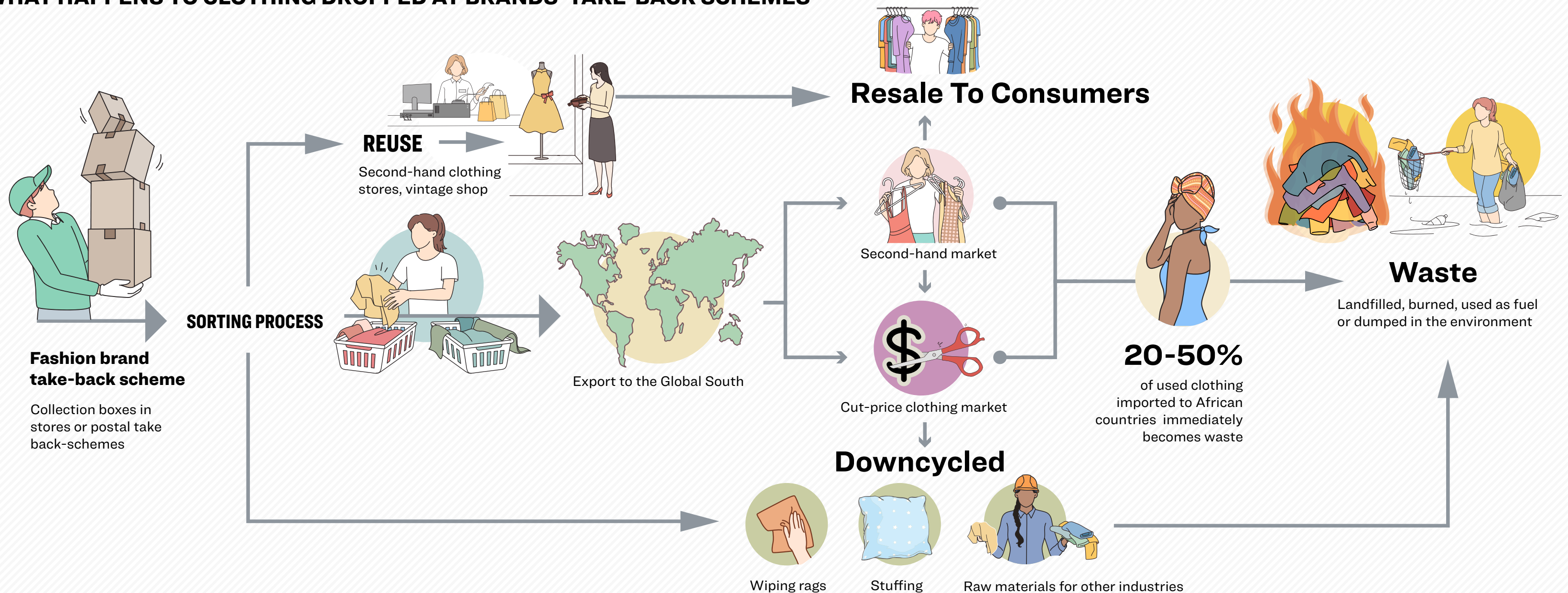
Box 2. Why downcycling is not a solution to fashion's overproduction problem

The process of downcycling, also known as open-loop recycling, is where materials are converted into something of lesser value than the original product (such as turning used clothing into insulation material), which itself cannot be easily recycled - in contrast to closed-loop recycling, which produces items of similar quality and value (clothing into clothing). Globally, some 12% of post-use clothing is sent for 'cascaded recycling' or downcycling to applications of lower value, such

as building insulation, flocking, cleaning rags and carpet padding. In comparison, the percentage of fibre-to-fibre recycling ranges from 1% to as little as 0.1%.³¹

While downcycling may offer limited benefits, such as prolonging the life of the materials involved, it does not contribute to a closed-loop recycling system for fashion waste, whereby clothing is made into new clothing. Downcycling fails to address the root problem of overconsumption and the continuous production of new clothes using virgin materials; instead, it can obscure the issue by leading people to believe the waste is under control. The potential for creating new cloth-

WHAT HAPPENS TO CLOTHING DROPPED AT BRANDS' TAKE-BACK SCHEMES



ing from old clothing materials is also missed, and after downcycling the material is usually landfilled or incinerated. For these reasons, referring to downcycling as recycling is a form of greenwashing and the claims accompanying brands' take-back schemes and collection bins highly misleading.



| A shirt given to Zara

2.2 Category 2: Resold within Europe

In total, five items of clothing found a second life either in a second-hand shop or with a customer on the same continent. Only one of these five was resold in the same country where it was initially deposited. A shirt that was deposited in a

Zara shop on Oxford Street, London in November 2022 found its way to a British Red Cross second-hand store in northwest England in Artis Park, Winsford, where it was resold.

This demonstrates a positive case of reuse within the same country, avoiding unnecessary miles. However, the availability of Zara take-back schemes is limited: in London our investigators had to try three central London Zara stores and make many enquiries with employees before actually finding a drop-off point.

In Paris, a sweater deposited at H&M's collection box travelled to a sorting facility in Darmstadt, Germany and then to Trnava, Slovakia, where it ended up in a second-hand shop within a span of two months. The final location in a residential area suggests that the sweater found a new home.

A checked blazer was submitted to Boohoo's REGAIN take-back scheme in the UK.



| Grey Jumper donated to H&M in France



Category 2: **Second-hand/Resold**





| Checkered jacket returned to Boohoo in the UK



| Nike puffer given to Nike in Berlin



| Grey coat given to Uniqlo

This item embarked on a 2,600km, five-month long journey through six countries before reaching its final destination. It travelled from the UK to the Netherlands, Poland, Germany, Latvia and eventually to Belarus. Although the extensive travel between recycling and exporting facilities is inefficient, the data suggests that the trousers ended up in a second-hand store or have already been resold in Brest, Belarus.

Two further items from Germany and the UK were sent for resale to Ukraine. In November 2022, a Nike puffer jacket was deposited in Nike's collection bin in Berlin, and a grey coat was dropped off at a Uniqlo store on London's Regent Street. Despite their original drop-off locations, both items underwent the same journey across Europe, covering around 2,650km each; from their original location, to the Netherlands, Poland and finally to Ukraine. Nike's jacket ended up in a second-hand store in Odessa in March 2023, where it appears to have been resold the same month. The grey coat's last recorded location was a residential area in Zaporizhzhia, so we can assume it has been resold or is still in a second-hand shop.

It is positive to see that these two items potentially found a new home, but while export of used clothing to Ukraine may seem like a positive thing, this is often far from the reality (see Box 3).

Box 3. Export of used clothing to Ukraine: a helpful gesture or a burden on an already overwhelmed nation?

Ukraine is dealing with an influx of used clothing, often of low quality. Even before Russia's full-scale invasion of Ukraine, the country was already a hub for used clothing, ranking as the third-largest importer globally after Pakistan and Malaysia.³² According to Observatory of Economic Complexity, in 2021, Ukraine imported €162 million (\$177 million) in used clothing.³³

However, the import of clothing is partially illegal. Following Russia's invasion in 2022, the import of humanitarian aid into Ukraine became easier. Many used-clothing dealers exploit these loopholes and import used clothing into Ukraine under the guise of humanitarian aid to sell in stores and boutiques. Clothing categorised as 'humanitarian aid' does not need to be cleared through customs and is not subjected to taxes. With the lack of oversight, it is challenging to determine the quantity of clothes being brought in, but an estimate from 2019 calculated that every year, the state budget loses up to €50 million (UAH 2 billion) from these schemes.³⁴ We do not know in what way the two items were imported into Ukraine.

Furthermore, Ukraine lacks the necessary recycling infrastructure to handle the aftermath of these imports. Even before Russia's invasion, the country was home to 6,100 landfills and around 33,000 illegal dumps.³⁵ Ukraine lacks a functioning waste management system and there is no plant that processes textile waste.

Instead, the country relies heavily on incinerators that promote 'safe incineration' as a solution for managing used clothing.³⁶ This widespread practice has reached such a level that some initiatives, NGOs including No Waste Ukraine³⁷ and media outlets are even encouraging people and businesses to send second-hand clothing

for this purpose.^{38,39} Shockingly, certain clothing brands are marketing incineration as a green practice for dealing with used clothing, going to the extent of inviting customers to dispose of their old items at their facilities to ensure their incineration.^{40 41}

The normalisation of incineration is alarming and, according to the Zero Waste Alliance Ukraine, safe incineration is a myth. Zero Waste Alliance Ukraine is among many civil society organisations warning that incineration can cause irreparable damage, such as through air and water pollution, to the health of the population and a considerable economic burden for communities. The construction and maintenance of incineration facilities requires a lot of money and waste input.^[x] In addition, some countries that operate incinerators, such as Sweden, end up importing huge amounts of waste from abroad to maintain their capacity and then export incineration residues to other countries. The waste does not magically disappear but is transformed to a more hazardous state and often shipped away.⁴²

To exacerbate the situation, the Ukrainian Ministry of Environment plans to build 27 additional incineration plants,⁴³ indicating a high likelihood of used clothing ultimately ending up burned, leading to increased pollution and dire consequences for the affected communities.⁴⁴

It is positive to see that the two tracked items potentially found a new home, but the wide influx of garments into Ukraine that end up being burned or dumped only adds to the struggles of a country already burdened by the ongoing war.

2.3 Category 3: Lost in limbo

This category includes eight clothing items that either never left the drop-off point or got stuck in limbo in the global used clothing system. For some UK companies, such as George at Asda and New Look, we attempted multiple times to deposit the clothing with the take-back scheme but to no avail. Asda had no drop-off boxes in the UK stores we visited in November 2022, despite a dedicated webpage describing how this effort is part of their ‘George for Good’ campaign.⁴⁵ New Look’s scheme is operated by ReFashion, yet despite numerous attempts using different addresses, the donation bags never arrived.⁴⁶ In both instances, these brands may



| Jacket returned to North Face in the UK

benefit from the optics of having a take-back scheme, despite it not being operational.

Other trackers appeared never to leave their point of deployment. Trackers in this category include one in a North Face jacket, which could not be traced beyond its London flagship store where it was dropped off in November 2022, and another in a beige Zara coat which was still live 11 months after deployment in Zara’s store in Berlin.

Finally in this category, several trackers made their way to inter-

mediary warehouses where they remained in limbo for many months. For example, a pair of Zara pyjamas deposited in Zara Les Halles, Paris, remained in a freight warehouse outside Paris for six months. What happened to these items is inconclusive, yet it is indicative of an inefficient system that clothing consumers expect to be reused or recycled is instead languishing in warehouses for months on end.

Finally, a puffer jacket dropped off at Zara’s Oxford Street store went first to a British Red Cross outlet in Winsford, Cheshire, then began a pan-European journey via the Netherlands and Poland before stopping at an industrial complex containing a textile recycling business, NOVO Projektai. Interestingly, this item continued its journey to an unidentified business park in Marijampolė, Lithuania where it was still live at the conclusion of the investigation.

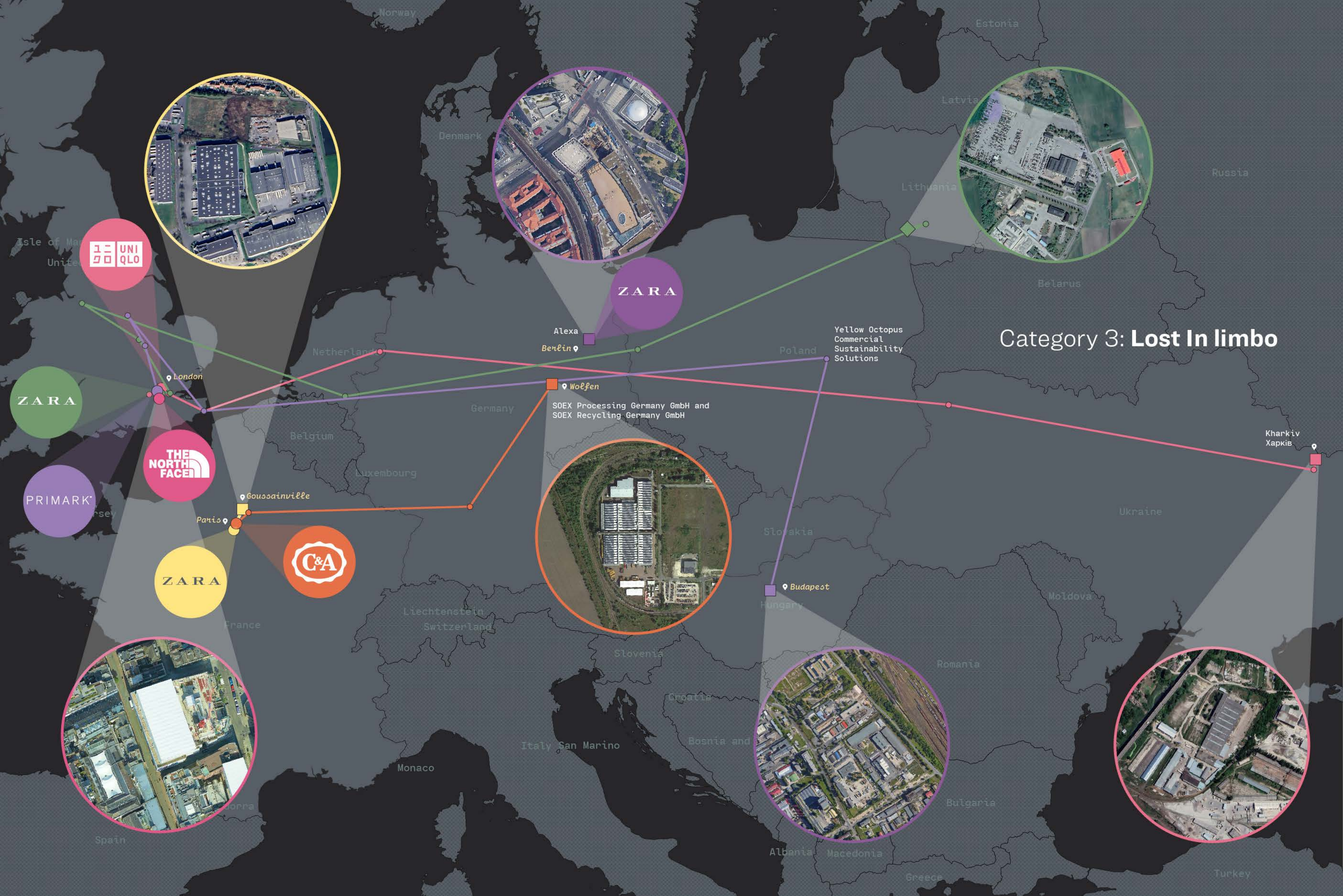
Take-back schemes which led to tracker results in this category are clearly failing to meet the goals communicated by brands. Whereas customers would assume their deposited clothes are reused or recycled into new clothes in a reasonable timeframe, in



| Pyjamas returned to Zara in France



| Puffer jacket returned to Zara in the UK



fact they have been left to languish in warehouses across Europe for up to a year. The brands have benefited from the reputational gains of operating a take-back scheme without having done anything at all with these clothes.

2.4 Category 4: Shipped to Africa

The most contentious category of trackers were those which were shipped eventually to countries in Africa. While four of the tracked items were shipped to the Global South with the intention of reuse, often this fate does not materialise.



Mali

An olive-green skirt and long-sleeved training top deposited at H&M's flagship Oxford Street store first passed through a series of sorting points and transit warehouses before making their way to Southampton port. From there they were loaded onto a container ship before appearing six weeks later in the United Arab Emirates and the SOEX Processing Middle East warehouse in Hamriyah Free Trade Zone. From there, the trackers went dark for up to five months before appearing again in Bamako, Mali, in western Af-



| Training top returned to H&M in the UK



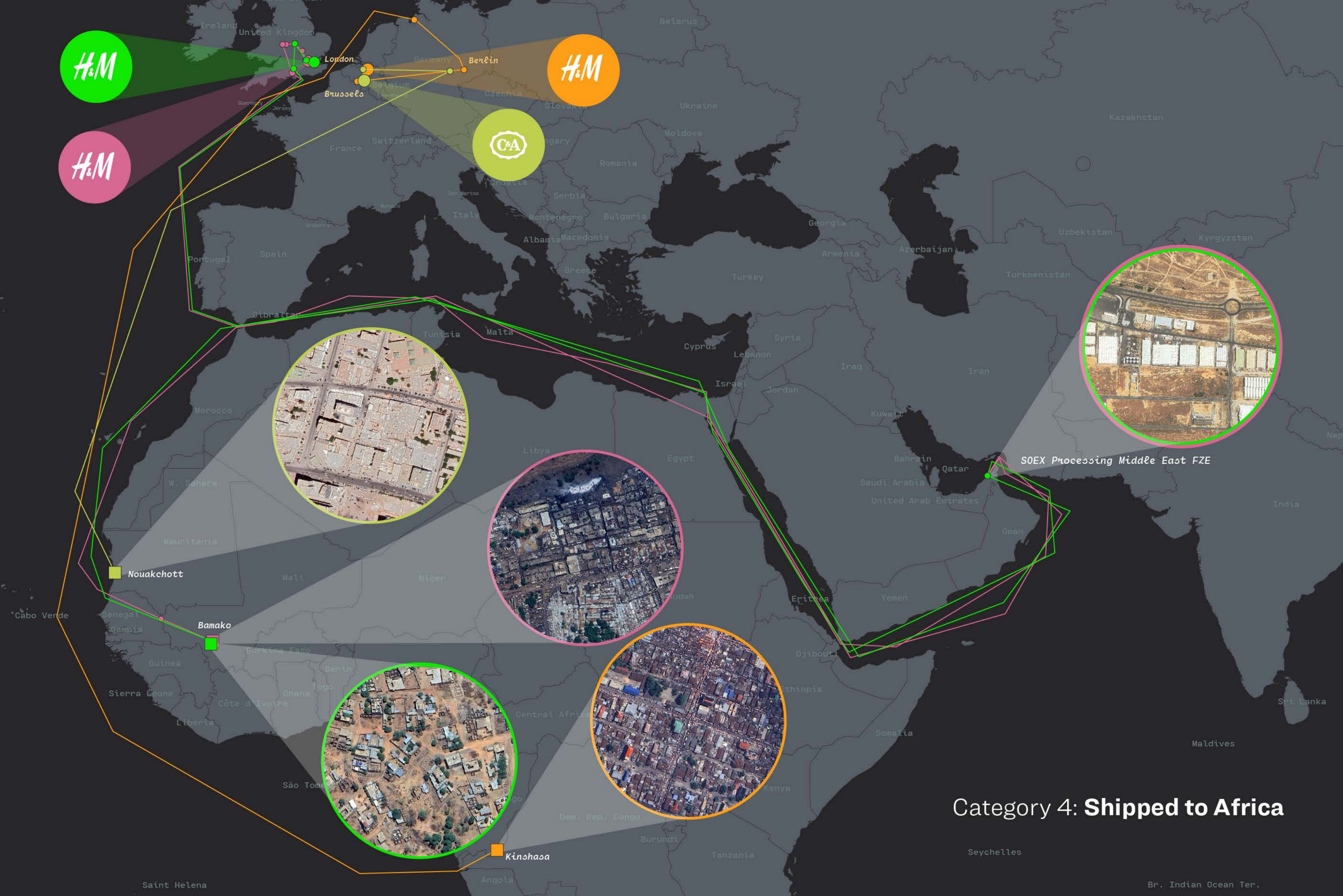
| Olive green skirt returned to H&M in the UK

rica. One picked up a signal in a truck stop in Senegal, suggesting it travelled inland from the coast via road. From here the location of the H&M items became harder to trace through desk-based research, spending some days in unidentifiable warehouses or depots, before the skirt moved to a vacant lot on the outskirts of the city, where evidence suggests it has been dumped or discarded.

The training top first entered a part of the city's Commune II with a number of second-hand clothing shops, and then onto the cheaper Marché



Southampton Port
Credit: Google Earth



H&M

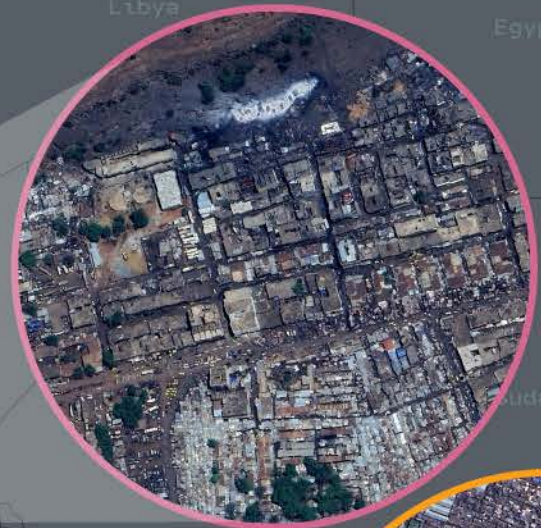
H&M

C&A

H&M



SOEX Processing Middle East FZE



Category 4: **Shipped to Africa**



SOEX Middle East
credit: Google Earth

de Médine, a sprawling market with a history of waste disposal issues. This was the last recorded location of the item.⁴⁷ As the top has remained on the market for over three months, its potential for resale diminishes over time. Like many other countries in the Global South, Mali has an informal waste management system resulting in large, overflowing landfills and dumpsites. In Bamako, the volume of waste and lack of infrastructure has, in the past, led to a large dumpsite being created in the Commune II quarter where our tracker ended up.⁴⁸ In similar markets across Africa, a large proportion of used clothing entering these destinations is not in fact sold and ends up in landfill, dumped or burned. Efforts have been made to alleviate the waste issue from the Malian capital in recent years, including opening new landfills and building a waste-to-energy plant.⁴⁹ However, even if these options were available, they do not live up to the promises of circularity fashion brands espouse.



The Marché de Médine in Bamako, Mali
credit: Google Earth

These two trackers travelled an estimated distance of 25,000km each, or more than halfway around the entire planet, to reach their destinations.

In 2019 (the last available records) UN Comtrade data shows Mali imported 29,351 tonnes of used clothing with 2,915 tonnes from UAE alone. As we discovered from our *Trashion* investigation, the UAE acts as a major sorting hub for the used clothing trade, taking advantage of the free trade zone and lower labour costs. This situation skews the trade data somewhat, obscuring the true origin country of the donated clothing.



Mauritania

A blue hoodie, deposited at a C&A store in Brussels, also ended up in an African country. This item travelled via ReSales, in Apolda in Germany's Thuringia region. This company is part of the TEXAID group and explicitly states it ships textiles to countries outside the EU.⁵⁰ The same company also processed the item that ended up at B+T Deuna's cement facility.

From this point the tracker also went dark before reappearing in Nouakchott, Mauritania. The presence of a large number of shipping containers in the ReSales warehouse satellite



| Blue hoodie dropped off at C&A in Belgium



| A clothing market in Nouakchott, Mauritania
Credit: Alamy

imagery suggests this was shipped by sea. Once in Nouakchott, the item moved between several locations identified as textile warehouses or second-hand shops in the city's Marché Cinquième district before going offline at a market in an area mostly dedicated to selling electronics, suggesting the possibility that the tracker was located, removed and resold at an electronics store. The textile markets in this area sell cut-price second-hand clothing.⁵¹ From here the item may have been resold, repurposed as cleaning cloths or disposed of. Our investigation in Kenya suggests that 20-50% of textiles ending up in similar markets in Africa immediately become waste.

In 2019, 8,114 tonnes of used clothing was shipped to Mauritania. Of this, 458 tonnes was from Belgium, the sixth biggest exporter to the country, with Germany accounting for 1,106 tonnes - the second biggest exporter.



Democratic Republic of the Congo

The other Belgian item, a black zipper top, deposited at H&M Ixelles, also transited through the SOEX plant in Bitterfeld-Wolfen in Germany. From here it was sent to Bremenhaven seaport before appearing four months later in Kinshasa, Democratic Republic of the Congo (DRC), Africa's third most populous city. The complex of buildings it was tracked to at the conclusion of the investigation contained businesses such as ETS Wilaai/Hamden Clothing Store. After a period of time there, the item moved on to a street market near the Marché Gambela in central Kinshasa, one of the largest second-hand markets in the city.⁵² Satellite photography of the market is analogous with street markets in our Kenyan investigation where we found cut-price clothing known as 'fagia' being sold for rags and fuel. In total the garment travelled over 11,400km to reach its destination.



| Black zipper top dropped off at H&M in Belgium

In 2021, areas around this market were reported to be surrounded by 'mountains of waste' including used clothing,⁵³ which arrives in bales referred to locally as 'balons'. There is a high competition for the good quality clothing. An interview we arranged with a source working in the country confirmed that there is no clothing recycling happening in the country, and while locals primarily rely on second-hand clothing rather than new clothing, there are no waste management options for clothes at the end of their usable life.

'Balons', or bales, of clothing in the DRC

Our source also described the dire situation of waste, including clothing waste, in the country. Waste is regularly dumped in ditches and drainage channels in streets, increasing the risk of flooding during periods of rain.⁵⁴ There is no waste management system able to deal with second-hand markets' refuse, and no collection available. We were told that most people burn old clothes in their backyard or in the streets to dispose of them. A study by conducted by Antea Group for the provincial government described the state of waste in Kinshasa as one of 'abject squalor'.⁵⁵ Our tracker ending up here raise concerns that textiles from European brands' take-back schemes are contributing to this issue.



For 2021, a total of 133,827 tonnes of used clothing was imported into DRC from around the world. Belgium represented the eighth biggest exporter, with a total of 3,719 tonnes exported in 2021. Germany came 11th, with 539 tonnes.

Africa: fast fashion's dumping ground?

All of our trackers which ended up in African countries went to or ended up in some kind of second-hand market, but according to our data none of the items was resold within the span of the investigation. While one appears to have been discarded



| Burning waste clothing in Africa

on a vacant lot, at least two H&M items ended up in a low-grade clothing market. There is ample evidence of the fate of such items, both from our own on-the-ground investigation in Kenya (see Box 1), as well as from the work of Greenpeace, The OR Foundation and others. As revealed by this research, anywhere from 20-50% of used clothing ending up in second-hand markets ends up as waste, a large proportion of which is waste synthetic clothing. Areas around second-hand markets are piled many feet deep in textile waste, and landfills around cities dealing with large quantities of textile waste, such as Accra in Ghana and Nairobi in Kenya, are swamped with discarded clothing, which has no use to waste-pickers and is often burnt in large open fires.

It is very concerning that clothing given to brands' own take-back schemes is contributing to the issue of used clothing waste in the Global South. C&A and H&M emerge as brands of concern in this investigation, with two trackers each ending up in the Global South. This is consistent with other recent investigations, such as one by Swedish newspaper *Aftonbladet*, which found H&M clothing from the company's take-back scheme in Sweden shipped to Benin, South Africa and India, and documented on-the-ground mismanaged textile waste.⁵⁶ More concerning still were the comments from H&M CEO Helena Helmersson downplaying H&M's responsibility for the issue.

With little chance of donated clothing being recycled into new clothing in Europe, that companies responsible for textile sorting and trading appear to be using the Global South as an out-of-sight, out-of-mind dumping ground with zero accountability for the items shipped there.



3. Conclusion and recommendations

Our research sheds light on the major flaws within a system grappling with the immense volume of clothing waste. Take-back schemes, often touted by brands as a tool of circularity, can create an illusion that the fashion industry is dealing with its massive waste problem. However, despite grand promises of reuse and recycling plastered on brands' collection boxes, they are failing to uphold their commitments. Within our research, 60% of clothing items lingered in warehouses, were downcycled or destroyed, while others were shipped to the Global South, adding to the burden on countries ill-equipped to deal with this pollution and waste crisis. With Europeans discarding 11kg of clothing per person every year, if the fate of our tracked garments is reflective of the wider market for used and donated clothing, it represents a very significant problem indeed.

Several instances showcase the worst-case scenarios. Trousers in great condition were shredded and set ablaze as fuel – despite C&A’s explicit claim that its items would be reused or recycled, with only a small fraction deemed unsuitable for these processes used for energy generation. Similarly, a pair of good-as-new trousers deposited at M&S were downcycled at a Veolia plant within a week of drop-off, despite the company claiming that downcycling is only considered for clothing it cannot resell. A skirt deposited at H&M’s London store took a five-month, 24,800km journey, through the United Arab Emirates and later to Bamako, Mali, where it was eventually found in a vacant lot, dumped or discarded.

Our findings suggest that take-back schemes are used as a tool for greenwashing, enabling brands to showcase circularity while avoiding meaningful systemic changes, like abandoning the wasteful fast-fashion model or investing in innovative fibre-to-fibre recycling technologies. These schemes offer consumers a false sense of environmental responsibility, tricking them into thinking that they are making a responsible choice. However, clothing companies are currently also absolved of accountability for the fate of collected clothing, enjoying all the reputational gains while the burden of waste management falls on others. What’s even more concerning is that some brands actively encourage consumption by offering incentives like vouchers or discounts when customers drop off their used clothing. By doing so, these brands perpetuate the very model of fast fashion that drives excessive consumption and waste.

Although this investigation focused on 21 tracked items, it is reasonable to assume that the practices uncovered are indicative of broader systemic issues and the deeply flawed nature of take-back schemes where there is no accountability or transparency. Given the relentless production of low-quality clothing by the fast-fashion industry, it is highly likely that the situation will deteriorate further.

With a constant influx of garments that are unsuitable for either reuse or recycling, the challenges surrounding end-of life management will only intensify.

It is clear that the fashion industry needs a wake-up call to start aligning with the upcoming regulatory storm, which will for the first time require the industry to take responsibility for the cost of end-of-life treatment of clothes and sorting of textiles before shipment abroad (see Box 4). The upcoming legislation around green claims will hopefully also deliver a blow to underhand greenwashing tactics and require substantial evidence for claims made by brands on their take-back schemes.

In spite of our main findings, a glimmer of hope emerges as five tracked items found new homes or are on their way to be reused. This demonstrates that the potential for reuse exists within the end-of-life management system, if only it were given the boost it deserves. The same goes for fibre-to-fibre recycling technologies, which are on the rise but lack the incentives from regulators to reach commercial-scale maturity. Consequently, clothing reuse and recycling are still at a pitifully low level.

It is therefore crucial for the upcoming legislation to also address these critical waste issues, a stance strongly supported by fashion companies. According to our recent *Synthetics Anonymous 2.0* report, which included a brand survey, over two-thirds (68%) of fashion brands backed ambitious reuse and recycling targets, while over 80% expressed their support for a mandatory EU-harmonised EPR scheme for textiles.⁵⁷ By recognising and acting on these signals, policymakers can pave the way towards a more sustainable and efficient textile waste management system for the future.

Box 4. EU policy/Waste Framework Directive

On 5 July 2023, the European Commission published its long awaited revision of the Waste Framework Directive, where it proposed an EU-wide EPR scheme for textiles and footwear.⁵⁸ This legislative proposal is the first attempt to regulate the environmental performance of the textile industry, specifically focused on its waste aspect. Member states are already obliged to ensure separate collection of textile waste by 2025, but this new proposal will also make textile producers, such as fashion brands, financially responsible for the end of life of their products. They will have to pay fees for every item they place on the market, which will be eco-modulated – meaning they will pay higher fees for items that are harder to recycle, for example. These fees will be collected by producer responsibility organisations (PROs) that will have to be established in every member state. PROs will be responsible for financing and implementing legal obligations, such as separate collection of textile and footwear products, sorting, preparation for reuse, recycling and other recovery operations and disposal, as well as providing information to consumers on sustainable consumption.

Importantly, the legal proposal also stipulates that collected textiles will be considered as waste until they have been properly sorted. Sorting will be financed through EPR fees and should separate textiles into different categories in line with the waste hierarchy: textiles suitable for reuse or preparation for reuse; textiles suitable for recycling, specifically fibre-to-fibre recycling; and finally waste textiles. While the Commission's proposal falls short of setting collection, reuse and recycling targets, such sorting obligations are badly needed in order to prevent what we have seen happening in this report: destruction or dumping of clothing in perfectly good condition. It remains to be seen what role company take-back

schemes will play in the emerging legislative environment, but it seems clear that the wild west of used textile trade is coming to an end, which could lead to a significant overhaul of this so-far unregulated industry.

Recommendations

I. Recommendations for policymakers

1. Introduce strong eco-design measures for textiles through the Sustainable Products Initiative

Eco-design requirements for textiles can ensure that clothing is more sustainable and durable by design. Measures should include using non-toxic, circular materials, limiting material mixing and blending, and eliminating substances of concern, all of which hinder circularity. Our market research indicates that, on average, brands produce items that typically contain five to seven different materials, including elastane, which prohibits recycling. These kinds of issues need to be addressed, so that we do not keep ending up with a huge pile of unrecyclable and toxic textile waste.

2. Introduce an EPR scheme for textiles through the upcoming Waste Framework Directive

The EU already requires separate collection of textiles by 2025 and the European Commission recently proposed mandatory EPR for textiles, which would make brands responsible for the products they place on the market and the end-of-life costs. It is crucial that the European Parliament and the Council of the European Union support strong legislation. Together with the European Environmental Bureau and Zero Waste Europe we commissioned a study from environmental consultancy Eunomia, *Driving a circular economy for textiles through EPR*. Key recommendations include:

2.1 Fees that drive real change

The ‘polluter pays’ principle must be respected, but EPR schemes that simply allow brands to ‘pay to pollute’ for a small fee run the risk of propping up the status quo; the fees should be sufficiently high to cover the full costs of collection and to meet targets for reuse and recycling. EPR schemes should support legislation for separate collection of textile waste by 2025 by making sufficient collection points available, so that collection truly serves the whole population and not just people living in cities. The fees should also be designed in a way to drive change in product design. Regulators can incentivise the uptake of particular products and practices by modulating fees on certain environmental criteria, such as durability and recyclability. In this way, companies that sell non-recyclable products (currently around a third of everything on the EU market) will pay higher fees. Eco-modula-

tion should be set at the EU level to ensure policy harmonisation. Lastly, the EPR scheme must be globally accountable to ensure that fees paid by producers to the PROs benefit and are distributed among those managing and carrying the burden of end-of-life-management in the Global South. It should be clearly defined which actors in importing countries are eligible to benefit from the revenues generated by the eco-modulated fees, and how these will be distributed.

2.2 Set performance targets that respect the waste hierarchy

EPR schemes should respect the waste hierarchy and always prioritise waste prevention and reuse over recycling. This can be achieved through integrating minimum targets on prevention and reuse set at the EU level. Waste prevention could also be supported with minimum criteria for durability and repair. The reuse sector must be protected and retain access to used textiles. Recycling targets should be set as a proportion of material that is not reused to comply with the waste hierarchy.

2.3 Support closed-loop recycling, instead of downcycling

It is vital that EPR schemes have the correct incentives to encourage recycling of clothes back into clothes and not false circularity, for example by using polyester from recycled plastic bottles. Targets for EPR schemes set at the EU level will be essential to drive improvements of used and waste textile management in member states. Eunomia's study recommends specific targets for collection, preparation for reuse and recycling, which should be periodically reviewed to ensure that they

are sufficiently ambitious. Currently, downcycling is the principal means through which 'recycling' takes place. This supports a reduction in materials going to disposal and reduces the use of virgin material in these products; however, closed-loop recycling (such as clothing-to-clothing recycling) and associated targets will be required to support a truly circular economy for textiles. As such, targets must evolve in a stepwise manner to steadily increase the proportion going to closed-loop recycling.

2.4 One EPR system for textiles won't fit all

EPR schemes should be set up for other groups of textile products beyond apparel, such as carpets and mattresses, and for other applications such as furniture.

2.5 Virgin plastic tax

Tackling overproduction of fashion and the mounting export of used synthetic clothing also means taking action to limit the use of virgin synthetic fibres that underpins the fast-fashion industry and its worsening waste crisis. A virgin plastic tax could help shift the market away from over-reliance on fossil-fuel-derived synthetics, account for the negative impacts of such materials (microfibre release, fossil fuel extraction and non-biodegradability at the end of life) and level the playing field with other fibres, which are more expensive than synthetics.

2.6 Progressive fees

One way to meet the Circular Economy Action Plan's objective of addressing fast fashion would be through setting progressive fees that are linked to the number of new items placed on the market every year. Brands should be incentivised to focus on quality rather than number of items placed on the market and to favour practices such as leasing, repairing and reusing items already on the market. The marginal cost of placing additional new items on the market would increase as more new items are placed on the market. In addition, a specific threshold for the quantity of new items placed on the market should be set.

II. Recommendations for fashion companies

Abandon greenwashing and misleading claims about guaranteeing reuse and recycling via take-back schemes, if the company has no visibility as to what happens to clothes collected in this way. Provide greater transparency about what happens with clothing dropped off in collection containers and ensure that this is supported by evidence and traceability of collected clothing.

Avoid offering discount coupons or similar purchase incentives for donated clothing and discourage consumers from seeing clothing as easily disposable.

Offer repairs and longer warranties to extend the lifespan of products.

Transition away from the unsustainable fast-fashion model and commit to phasing out synthetic materials based on fossil feedstocks.

Invest in viable fibre-to-fibre recycling technologies to scale up circular business models.

Openly express support for progressive legislation and advocate for improved circularity and waste management, including the mandatory EPR system and reuse and recycling targets. Actively encourage peers to join in supporting these measures, while distancing yourselves from industry initiatives that oppose or undermine such legislation.

III. Recommendations for consumers

Avoid compulsive shopping and buy only what you really need, shop second-hand and try to extend the durability of clothes, through repair, reuse and swapping, where possible.

Buy only from brands that have made clear commitments to transparency in their supply chains, to sustainable sourcing and production of all their materials and garments, and which have strong climate commitments, including a clear plan to phase out their dependence on fossil fuel-based fibres.

Raise awareness of the problems with fast fashion, and use your voice - for example, through social media or signing petitions - to highlight issues such as greenwashing, exploitative practices, environmental harm and unsustainable consumption.

References

- 1 McKinsey (2016) Style that's sustainable: A new fast-fashion formula [ONLINE] Available at: <https://www.mckinsey.com/capabilities/sustainability/our-insights/style-thats-sustainable-a-new-fast-fashion-formula>
- 2 Ellen MacArthur Foundation (2017) A new textiles economy: Redesigning fashion's future [ONLINE] Available at: https://www.ellenmacarthurfoundation.org/assets/downloads/A-New-Textiles-Economy_Full-Report_Updated_1-12-17.pdf
- 3 Chandran, M., Tamilkolundu, S. and Murugesan, C. (2020) Conversion of plastic waste to fuel. In T. M. Letcher (ed.) Plastic waste and recycling. Cambridge, Massachusetts: Academic Press, 385–399.
- 4 WRAP (2022) Off the starting blocks: Annual report [ONLINE] Available at: <https://wrap.org.uk/sites/default/files/2022-11/Textiles%202030%20Annual%20Progress%20Report%202021-22.pdf>
- 5 &M (2023) H&M Group and Remondis create joint venture to collect, sort and sell used and unwanted garments and textiles [ONLINE] Available at: <https://hmgroupp.com/news/hm-group-and-remondis-create-joint-venture-to-collect-sort-and-sell-used-and-unwanted-garments-and-textiles/>
- 6 WRAP (2021) Retailer clothing take-back guide [ONLINE] Available at: <https://wrap.org.uk/sites/default/files/2021-02/Retailer-clothing-take-back-guide-Feb21.pdf>
- 7 Zara (n.d.) Zara Pre-owned [ONLINE] Available at: <https://www.zara.com/uk/en/preowned-donate-mkt5798.html>
- 8 Fashion United (2021) « We take it back » : C&A étend son offre circulaire dans les magasins français [ONLINE] Available at: <https://fashionunited.fr/actualite/retail/we-take-it-back-c-a-etend-son-offre-circulaire-dans-les-magasins-francais/2021120128506>
- 9 Lindberg, S. (2023) Aftonbladets avslöjande om H&M:s återvinning i 9 punkter. Aftonbladet, 12 June 2023 [ONLINE] Available at: <https://www.aftonbladet.se/nyheter/a/JQGbrm/aftonbladets-avslojande-om-h-m-s-atervinning-i-9-punkter>
- 10 H&M (n.d.) Let's close the loop [ONLINE] Available at: https://www2.hm.com/en_gb/sustainability-at-hm/our-work/close-the-loop.html
- 11 C&A (2023) We Take It Back [ONLINE] Available at: <https://www.c-and-a.com/fr/fr/shop/we-take-it-back>
- 12 The North Face (n.d.) Bring your gear full circle [ONLINE] Available at: <https://www.thenorthface.co.uk/take-back.html>
- 13 reGain app (n.d.) Boohoo [ONLINE] Available at: <https://regain-app.com/coupon-codes-boohoo-com-uk>
- 14 Adidas (2022) Trade in gear & pass it on [ONLINE] Available at: <https://www.adidas.co.uk/blog/400685-trade-gear-in-and-pass-it-on>
- 15 WRAP (2021) Retailer clothing take-back guide [ONLINE] Available at: <https://wrap.org.uk/sites/default/files/2021-02/Retailer-clothing-take-back-guide-Feb21.pdf>
- 16 SOEX (2023) About Us [ONLINE] Available at: <https://www.soex.de/en/about-us/>
- 17 SOEX (2023) Recycling [ONLINE] Available at: <https://www.soex.de/en/services/recycling/>
- 18 C&A (2023) We Take It Back [ONLINE] Available at: <https://www.c-and-a.com/fr/fr/shop/we-take-it-back>
- 19 Zivefirmy (2023) KOUTECKÝ s.r.o [ONLINE] Available at: https://www.zivefirmy.cz/koutecky_f253396
- 20 iDataBaze (2023) KOUTECKÝ, s.r.o [ONLINE] Available at: <https://www.idatabase.cz/firma/156403-koutecky-sro/>
- 21 H&M (n.d.) Let's close the loop [ONLINE] Available at: https://www2.hm.com/en_gb/sustainability-at-hm/our-work/close-the-loop.html
- 22 SOEX (2023) About Us [ONLINE] Available at: <https://www.soex.de/en/about-us/>
- 23 Racked (2015) The Company That Might Fix Fashion's Waste Problem [ONLINE] Available at: <https://www.racked.com/2015/10/14/9524707/ico-fashion-sustainability>
- 24 ReSales (2023) Export Sales [ONLINE] Available at: <https://rs-textil.com/en/export-sales.html>
- 25 B+T Group (2023) B+T Group [ONLINE] Available at: <https://www.bt-umwelt.de/en/>
- 26 NDR Doku (2022) Plastik - Die Recycling-Lüge [ONLINE] Available at: <https://www.youtube.com/watch?v=KD8fcTjyP1E>
- 27 Veolia UK (2023) St. Albans [ONLINE] Available at: <https://www.veolia.co.uk/st-albans>
- 28 Marks & Spencer (2023) Plan A Shwopping [ONLINE] Available at: <https://www.marksandspencer.com/c/plan-a-shwopping>
- 29 Opendatabot (2023) TOB «ЮКРАПЛІАКТ» [ONLINE] Available at: <https://opendatabot.ua/c/43048260>
- 30 Primark (2020) Let Your Pre-Loved Be Re-Loved [ONLINE] Available at: <https://www.primark.com/en-gb/a/inspiration/sustainable-fashion/let-your-pre-loved-be-re-loved>
- 31 Ellen MacArthur Foundation (2017) A new textiles economy: Redesigning fashion's future [ONLINE] Available at: https://www.ellenmacarthurfoundation.org/assets/downloads/A-New-Textiles-Economy_Full-Report_Updated_1-12-17.pdf

- 32 Kyiv Post (2018) Ukraine ranks third in world for imported second-hand clothes [ONLINE] Available at: <https://archive.kyivpost.com/business/ukraine-ranks-third-in-the-world-for-imported-second-hand-clothes.html>
- 33 OEC (2023) Used Clothing in Ukraine [ONLINE] Available at: <https://oec.world/en/profile/bilateral-product/used-clothing/reporter/ukr?redirect=true>
- 34 TCH (2019) У Мінсоцполітики пояснили, проти яких “секонд-хендів” почнуть боротьбу [ONLINE] Available at: <https://tsn.ua/ukrayina/u-minsocpolitiki-poyasnili-proti-yakih-sekond-hendiv-pochnut-borotbu-1467357.html>
- 35 France 24 (2021) 'Drowning in garbage': Ukraine struggles with trash crisis [ONLINE] Available: <https://www.france24.com/en/live-news/20211203-drowning-in-garbage-ukraine-struggles-with-trash-crisis>
- 36 EcoPolitic (2021) Old jeans energy: unnecessary clothes are accepted for disposal [ONLINE] Available at: <https://ecopolitic.com.ua/en/news/energiya-zi-starih-dzhinsiv-v-kiievi-pochali-prijmati-na-utilizaciju-nepotribnij-odyag-2/>
- 37 Zero Waste Ukraine (2023) СПАЛЮВАННЯ [ONLINE] Available at: <https://nowaste.com.ua/burning/>
- 38 Zero Waste Ukraine (2023) СПАЛЮВАННЯ [ONLINE] Available at: <https://nowaste.com.ua/burning/>
- 39 The Village (2022) Чому потрібно утилізувати зношений одяг і де можна це зробити [ONLINE] Available at: <https://www.the-village.com.ua/village/city/city-news/328001-chomu-potribno-utilizuvati-znosheniy-odyag-i-de-mozhna-tse-zrobiti>
- 40 Instagram (2023) Lucky Reef [ONLINE] Available at: <https://www.instagram.com/p/CjVvwaCjYJL/>
- 41 Instagram (2023) Dodosocks [ONLINE] Available at: <https://www.instagram.com/p/CqSlxutMkg6/>
- 42 Bioenergy International (2020) German mine to become new site for Swedish fly ash [ONLINE] Available at: <https://bioenergyinternational.com/german-mine-to-become-new-site-for-swedish-fly-ash/>
- 43 ЕКОЛОГІЯ ПРАВО ЛЮДИНА (2023) Імітація євроінтеграційного поступу Міндовкілля: відходи у фокусі [ONLINE] Available at: <https://www.google.com/url?q=http://epl.org.ua/announces/imitatsiya-yevrointegratsijnogo-postupu-mindovkilliya-vidhody-u-fokusi/&sa=D&source=docs&ust=1688730340057837&usg=AOvVaw2q5Rpw82rsmQC4uA0bxUL>
- 44 Zero Waste Alliance Ukraine (n.d.) Посібник «Міф про безпечне сміттєспалювання» [ONLINE] Available at: <https://zerowaste.org.ua/2023/04/10/mif-pro-smittyespalyuvannya/>
- 45 George at Asda (2023) We Are Recycling [ONLINE] Available at: <https://takeback.george.com/>
- 46 New Look (2023) ReFashion [ONLINE] Available at: <https://www.newlook.com/uk/sustainability/re-fashion>
- 47 L'Indiscret (2022) Bamako : Les ordures souillent le marché de Médine. [ONLINE] Available at: <https://lindiscret.net/bamako-les-ordures-souillent-le-marche-de-medine/>
- 48 Bainier, C. (2018) In the heart of Bamako, a landfill takes over a neighbourhood. France 24, 3 December 2018 [ONLINE] Available at: <https://observers.france24.com/en/20181203-mali-bamako-landfill-school-trash>
- 49 Magoum, I. (2021) Mali: A campaign to remove 500,000 tonnes of waste from Bamako and Kati. Afrik 21, 9 July 2021 [ONLINE] Available at: <https://www.afrik21.africa/en/mali-a-campaign-to-remove-500000-tonnes-of-waste-from-bamako-and-kati>
- 50 ReSales (2023) Export Sales [ONLINE] Available at: <https://rs-textil.com/en/export-sales.html>
- 51 Cridem (2012) Nouakchott : Le Foukkou Diaye (friperies) très convoité [ONLINE] Available at: https://cridem.org/C_Info.php?article=627216
- 52 Cabanda, C. (2021) La friperie abonde la plupart des garde-robes et valises des Kinois. Kinshasa Times, 11 August 2021 [ONLINE] Available at: <http://www.kt.cd/la-friperie-abonde-la-plupart-des-garde-robes-et-valises-des-kinois>
- 53 Actu7.cd (2021) Kasa-Vubu : le marché Gambela s'entoure des montagnes d'immondices [ONLINE] Available at: <https://actu7.cd/2021/07/15/kasa-vubu-le-marche-gambela-sentoure-des-montagnes-dimmondices>
- 54 Ntumba, A. (2023) Poor waste management chokes DR Congo's capital, increases risk of flooding. Prevention Web, 6 January 2023. [ONLINE] Available at: <https://www.preventionweb.net/news/poor-waste-management-chokes-dr-congos-capital-increases-risk-flooding>
- 55 Antea Group (2023) Solid waste collection in Kinshasa, Democratic Republic of the Congo [ONLINE] Available at: <https://int.antea-group.com/projects/solid-waste-collection-in-kinshasa#87043>
- 56 Lindberg, S. and Wennman, M. (2023) Här dumpas H&M-kläderna du "återvinner". Aftonbladet [ONLINE] Available at: <https://www.aftonbladet.se/nyheter/a/O8PAYb/har-dumpas-h-m-kladerna-du-atervinner>
- 57 Changing Markets Foundation (2022) Synthetics Anonymous 2.0 [ONLINE] Available at: <http://changingmarkets.org/wp-content/uploads/2022/12/Synthetics-Anonymous-2.0-Report-final-web.pdf>
- 58 European Commission (2023) Proposal for a Directive Of The European Parliament And Of The Council amending Directive 2008/98/EC on waste [ONLINE] Available at: https://environment.ec.europa.eu/system/files/2023-07/Proposal%20for%20a%20DIRECTIVE%20OF%20THE%20EUROPEAN%20PARLIAMENT%20AND%20OF%20THE%20COUNCIL%20amending%20Directive%20200898EC%20on%20waste%20COM_2023_420.pdf

