



# Introducing Extended Producer Responsibility (EPR) for Textiles & Fashion in the UK

BRITISH  
FASHION  
COUNCIL



UK Research  
and Innovation

ukft

September 2025

# Introducing Extended Producer Responsibility (EPR) for Textiles and Fashion in the UK

September 2025

## Contents

1. About
2. Acknowledgements
3. Summary
4. Background
5. The Opportunity
6. The Case for tEPR
7. tEPR Fees and Investment
8. The Implementation Pathway
9. Conclusion
10. Appendix
  - a. What do we mean by fashion and textiles?
  - b. What is EPR?
  - c. What is a Producer Responsibility Organisation (PRO)?
  - d. What are the alternatives to tEPR?
  - e. Current state of EU legislation
  - f. Relevant government departments
11. Bibliography

# 1 - About

The British Fashion Council (BFC) commissioned this paper on behalf of the Circular Fashion Innovation Network (CFIN) to support policy development for the implementation of Extended Producer Responsibility (EPR) for fashion and textiles in the UK – a Textiles EPR (tEPR). It is intended to amplify discussions held at the March 2025 Institute of Positive Fashion Forum<sup>i</sup>, complement CFIN's May 2025 Programme Report<sup>ii</sup>, and is timed to support the work of the Government's Circularity Economy Taskforce<sup>iii</sup>, due to report in autumn 2025.

Between 2023-2025, CFIN was an industry programme led by the BFC and UK Fashion and Textile (UKFT) - in partnership with UK Research and Innovation (UKRI) - to accelerate the UK towards a circular fashion ecosystem. The network brought together industry, innovators, investors, NGOs, academia and broader stakeholders through an action-led programme of work to accelerate the UK to a leading Circular Fashion Economy, as part of the Institute of Positive Fashion.

## 2 - Acknowledgements

Lilli Geissendorfer developed this paper between January and March 2025. It draws on the work of the CFIN Policy Working Group between September 2024 and March 2025, made up of representatives from across the CFIN network during that time period:

- Abbie Morris, Founder, Compare Ethics
- Alan Wheeler, Chief Executive, Textiles Recycling Association
- Caroline Darby, Global Compliance Lead, John Lewis
- David Leigh-Pemberton, Deputy Director of Policy & Engagement, BFC
- Lauren Junestrand, Innovation & Sustainability Network Manager, UKFT
- Dr Mark Sumner, Textiles Lead, WRAP
- Sara Elkholy, CFIN Programme Director, BFC
- Shailja Dubé, Deputy Director, Institute of Positive Fashion, BFC
- Simon Platts, CEO/Co-founder, Recomme
- Sophie De Salis, Sustainability Policy Advisor, British Retail Consortium
- Timothée Duret, Director of Sustainable Technology, Veolia
- Zain Ali, CFIN Programme Manager, BFC

We acknowledge their thoughtful contributions and generosity in sharing their time and perspectives over six Policy Working Group sessions, as well as through individual interviews. Their inclusion here does not imply endorsement of the recommendations presented. The paper also draws on insights from a wide range of grey literature, webinars and events listed in the bibliography.

Special thanks to the CFIN team (BFC & UKFT) for their invaluable expert input in shaping the focus of this paper.

Lilli Geissendorfer is a cultural policy and sustainability consultant with 20 years' experience across the creative industries. She is Director of the Theatre Green Book, sits on the Mayor of London's Cultural Leadership Board, and has held senior roles at the Creative Policy and Evidence Centre, Jerwood Arts and Arts Council England.

# 3 - Summary

## Overview

Extended Producer Responsibility (EPR) offers a mechanism to address both the environmental and economic challenges posed by the fashion and textile industry. In 2023, the UK fashion and textile industry contributed £62 billion to the economy<sup>iv</sup>, but it also generated significant environmental costs, including millions of garments sent to landfill and substantial CO<sub>2</sub> emissions<sup>v</sup>. EPR is now widely recognised as the most effective policy intervention, with the potential to drive the sector towards circularity, reduce waste, and cut emissions, aligning with this government's broader growth and net-zero objectives.

This paper outlines the CFIN's policy recommendations for introducing legislation on mandatory, variable tEPR in the UK. Positioned to contribute to the Government's Circular Economy Taskforce, the recommendations support the introduction of a tEPR within this Parliament. The paper underlines the urgent need for legislative action to ensure the UK remains a global leader in sustainable fashion and textiles, addressing both economic growth and environmental sustainability.

These recommendations are rooted in industry-led research and consultation with leading UK fashion bodies and business associations, including the BFC, British Retail Consortium (BRC), UKFT, WEFT and Waste Resource Action Plan (WRAP), alongside international peers and examples of EPR in practice.

## The case for tEPR

### Delivering growth for priority sectors and achieving waste targets:

tEPR offers this government the opportunity to deliver future-proof innovation at scale across two of its priority growth sectors: creative industries and advanced manufacturing<sup>vi</sup>. In addition, EPR would accelerate the ability of devolved nations to deliver on the Environment Act 2021 and achieve significant waste reduction and recycling targets. By introducing mandatory, variable EPR, the UK can incentivise sustainable practices while penalising harmful ones, driving ecodesign, reducing waste, and catalysing the circular economy within the fashion and textiles industry.

### International advantage:

tEPR presents a proven, pivotal mechanism for resourcing sustainable growth and transition to a low-carbon economy for the fashion and textile industry, ensuring long-term environmental and economic resilience. Several countries have already successfully implemented EPR policies for textiles, and the UK's approach could set a new global standard. EPR's growing international presence offers an opportunity for the UK to maintain its competitive edge in the global fashion and textile market, while aligning with upcoming EU regulations on eco-design and waste management.

### Industry collaboration:

The sector is ready for a tEPR. CFIN and partners such as WEFT have been at the forefront of research and development towards a UK-specific EPR framework. The fashion and textile sector is already embracing circular practices, and further data collection and pilot schemes are essential to refine the EPR model. CFIN advocates for continued investment in research and testing to ensure the success of the scheme.

The Environment Act 2021 provides the legislative powers necessary to introduce EPR via secondary legislation, enabling streamlined, timely action without requiring a new Act of Parliament.

Key policy recommendations

CFIN outlines three core principles to guide the development of tEPR legislation:

- 1. **Variable ‘Eco-Modulated’ Fees:** Variable fees are essential for incentivising eco-design and sustainable business models. This structure ensures financial rewards for companies that prioritise sustainability, while penalising free riders with high flat fees.
- 2. **Mandatory:** tEPR must apply to all textile producers, including Small and Medium-sized Enterprises (SMEs), ensuring that no company is exempt due to size or scale to create a level playing field. The policy should avoid creating loopholes that undermine its impact.
- 3. **Ring-Fencing Funds for Circular Investment:** Income generated from tEPR fees must be dedicated to investing in the continued research, innovation and scaling of the circular business models, sustainable manufacturing and recycling infrastructure needed to transition to a circular textile economy across the UK.

Legislative Pathway: Achieving a tEPR within this Parliament

Phase	Milestone
Explore	Publish Green Paper; engage stakeholders across devolved nations; identify Producer Responsibility Organisations (PROs)
Test	Pilot voluntary data submission and fee trials with industry
Commit	Publish White Paper; draft and pass secondary legislation; secure royal assent
Implement	Begin phased roll-out of tEPR obligations

Next steps

tEPR can drive innovation, reduce waste, and place the UK at the forefront of sustainable fashion policy. Clear political direction and timely consultation are now critical to delivery. With the legal framework in place, strong industry momentum, and cross-nation collaboration, a tEPR can be delivered within this parliamentary term. Clear political direction and timely consultation led by the Department for Environment and Rural Affairs (DEFRA) are now critical to delivery.

CFIN recommends continued collaboration between industry and government bodies, including the Department for Environment, Food and Rural Affairs (DEFRA), the Department for Business and Trade (DBT) and the Department for Culture, Media and Sport (DCMS), to finalise the research, test models, and ensure the scheme is both effective and inclusive. Ensuring a smooth transition to full EPR implementation will require transparent, data-driven policy-making and industry support. The next steps include research to refine fee structures, agreeing and standardising data reporting, and committing to a legislative timeline.

CFIN urges this government to start the EPR legislative pathway to provide certainty for industry, and reap the benefits of accelerating the transition to a globally competitive, low-carbon textile and fashion economy.



## 4 - Background

### **Economic and environmental impact**

The UK fashion and textile industry is a significant player in both the economic and environmental landscape. The industry contributed £62 billion GVA to the UK economy in 2023<sup>vii</sup>, highlighting its importance in terms of employment, revenue, and cultural impact regionally and nationally. However, the environmental cost of the fashion and textiles industry is substantial.

In 2022, the UK purchased 1.42 million tonnes of textiles and discarded 1.45 million tonnes. Almost half of discarded textiles (49%, or 711,000 tonnes) ended up in general waste bins, from where 84% were incinerated for energy recovery, and 11% sent to landfill. Reuse and recycling organisations collected and handled 233.5k tonnes of used textiles, the most since reporting began, and up 8% in 2019. Second-hand textiles sold to UK consumers was equal to 9% of new products. So, while some textiles are diverted for reuse and recycling, the data<sup>viii</sup> highlights the significant amount of textile waste that ends up in the residual waste stream and the substantial work to do to achieve the Resources and Waste Strategy target of 65% textile collection rate by 2035.

Globally, estimates suggest fashion and textiles contribute approximately 8-10% of global greenhouse gas emissions, more than aviation and shipping combined<sup>ix</sup>. The linear model of fashion production is resource and waste intensive, with around 80% of textiles leaking out of the system when they are discarded, and less than 1% post-consumer clothing waste going back into making new clothing<sup>x</sup>.

The scale of the negative environmental impact of fashion and textiles on population health, nature and biodiversity means the fashion and textiles sector are recognised as critical to mitigating the effects of climate change and evolving global economic systems towards resilient, low-energy, circular economies.

### **Transition to circular systems**

The global textile and apparel industry has begun to explore its transition to a circular system in the past decade, and this has been accelerated in recent years<sup>xixixiii</sup>. Consequently, we are witnessing a significant rise in innovation of new materials, processes and technologies to reduce environmental impact and reach circularity. New business models and services are also emerging to support product reuse, repair, remanufacture and recycling. There is now both agreement and significant momentum that circularity is critical to the future success of the sector.

A successful circular fashion and textile system depends on commitment from many different stakeholders in the supply chain and along the product life-cycle, all working together to identify key challenges and to innovate, test and scale new ways of developing, producing, using and recycling textile-based products. The development and near-future implementation of a growing number of fashion and textile and apparel specific global regulations across e.g. the EU<sup>xiv</sup>, is providing further impetus for businesses to accelerate their efforts to reach circularity.

With the UK government introducing increased focus on circular economy principles over recent years (e.g. Resource and Waste Strategy 2018<sup>xv</sup>), introduction of UK-wide EPR for packaging, and devolved nations taking a lead on bringing forward legislation (e.g. Scotland's Circular Economy Strategy and Route Map to 2030<sup>xvi</sup>), there is now a broad understanding that circular economies are a core feature of a low-carbon future.

### **Extended Producer Responsibility (EPR)**

The Extended Producer Responsibility (EPR) policy approach is a group of economic instruments that raise revenues and set incentives for the collection and recovery of material at the post-consumer stage of the product life cycle. Producers have an integral role in implementation of EPR policies. Producers have agency to reduce the impacts of their products throughout the product life cycle, including by improving design and waste management.

The EPR policy approach was developed conceptually in the 1990s as a framework for addressing the growing volume and complexity of waste. Previously, the public sector had typically financed and physically operated waste management. Beginning with deposit refund systems for beverage containers, followed by requirements set by governments for producers to ‘take-back’ and achieve recycling targets for packaging in the 1990s, policymakers have increasingly turned to the EPR policy approach to address the dual issues of the volume and complexity of waste, including plastics waste.

Decades of experience with EPR across a wide range of products suggests that, if done properly, it increases transparency, mobilises significant financial resources and consequently increases collection and material recovery rates of targeted products. With fee modulation, it can also incentivise design change and possibly reduce the use of primary materials. In the extensive literature available on EPR policy design, implementation and governance (see *Bibliography*), there are common principles that have been linked with successful EPR schemes. These include establishing clear definitions of producers and their obligations (such as setting targets for collection and recovery) and developing stakeholder coordination. EPR schemes require partnership with governments to ensure a levelled playing field and fair competition. Schemes should be transparent to enable monitoring and evaluation and must recognise and integrate the work of the informal sector.

EPR has been applied in the UK and internationally in other sectors, including packaging, electronics and car tyres. To date, countries with mandatory EPR policies covering textiles include France, Hungary, Latvia and the Netherlands, with Australia and others operating voluntary EPR schemes. EPR policy for textiles is currently proposed or being rolled out in a range of other countries and regions (including Ghana, Kenya, Colombia, California, New York, and all EU Member-States)<sup>xvii</sup>.

EPR is typically managed by one or more Producer Responsibility Organisation (PRO), whose role and scope, financial and operational, is set out in legislation.

See *Appendix: What is EPR? and What is a Producer Responsibility Organisation?* for more details.

## 5 - The Opportunity

British-based fashion brands and industry partners have been leading pioneering research and innovation towards development of a UK specific, evidence-based, incentives-driven framework for EPR as a pivotal mechanism to accelerate and sustain a circular textile ecology.

Recent years has seen the publication of influential reports including BFC’s Designing the Green Transition, BRC’s Governing Principles for EPR, UKFT’s submission to Treasury for the Government’s spending review, WEFT’s EPR Variable Fee White Paper, CFIN’s Interim Report, WRAP EPR Status Report 2024, and Ellen MacArthur Foundation’s Pushing the Boundaries of EPR Policy for Textiles, exploring the potential and feasibility of EPR.

There is now broad consensus on the scope, design and necessity of mandatory tEPR in the UK to drive sustainability and establish a circular economy in the fashion and textiles sector. Supported by WEFT, the sector has already made significant progress researching the necessary detail to inform an effective UK EPR framework, working increasingly collaboratively to shift business models to circularity and reducing carbon emissions.

This government has a unique opportunity to leap ahead of international competitors through bringing forward legislation to introduce EPR for textiles in the UK. Mandatory variable EPR provides a mechanism to generate income specifically to invest in the full cost-recovery of textile waste management, reward eco-design and circular business models and penalise unsustainable practices. EPR can therefore play a critical part in delivering this government’s growth and net zero missions.

EPR redefines legally and publicly who the polluter is - resetting our relationship with products over their lifecycle and supporting long-term behaviour change from producer and consumers. In this paper, EPR means “legislation that places responsibility for the treatment, reuse, upcycling, recycling and end of life of consumer textile products manufactured, produced or placed on the market in the UK on producers and manufacturers”. This paper proposes EPR apply initially to apparel, it will then extend to footwear, accessories and homeware<sup>xviii</sup>.

In the UK, the 2024 EPR Sandbox and resulting White Paper<sup>xix</sup>, from QSA Partners and UKFT, led to the set up of WEFT, an organisation dedicated to developing a data-driven, fair and equitable EPR fee system for the international fashion and textiles industry. Further data and analysis into variable fee-levels for EPR is now needed to set incentives and penalties at the right level. An effective EPR scheme will stimulate private investment, create green jobs, incentivise innovation, smooth trade and generate new opportunities throughout the textile product cycle - together creating the necessary conditions for the sector to adapt to, and thrive, in a decarbonised economy.

Key industry-led initiatives supporting the transition to circular economy and decarbonisation:

- Circular Fashion Innovation Network
- Automatic-sorting for Circular Textiles Demonstrator (ACT) Demonstrator Project
- Institute for Positive Fashion, British Fashion Council
- Textiles 2030 Strategy<sup>xx</sup>, and Database for textile recycling
- TRUST Standard
- EPR Sandbox and eco-modulation data research
- Eco-Design requirements legislation across EU
- Set up of WEFT 2024 to support data standardisation and evidence-led development of EPR mechanism

### Three core principles of a UK tEPR

There is now extensive literature on policy, principles and governance of effective EPR systems<sup>xxi</sup>, providing a strong practical evidence-based starting point for the UK. Based on industry consultation, CFIN strongly recommends legislation is developed based on three core principles for effective EPR arising from the existing research:

- **Variable ‘eco-modulated’ fees:** Only intelligence-led variable fees will incentivise and reward eco-design and sustainable practices and support continuous progress towards net zero. Variable fees are applied to all obligated producers providing data, with a flat fee set at a high, disincentivizing level for free riders. Updating fee levels regularly means the financial incentives for businesses to implement circular business models is a driving force for change under EPR legislation.
- **Mandatory:** EPR must apply to, and be feasible for, all obligated producers placing products on the UK market, including SMEs and those with lower product volumes to create a level playing field. Policy traps - such as only applying EPR to companies of a certain size or scale - must be eschewed to avoid unintended creation of loopholes and thresholds that distort and undermine its impact.
- **Ring-fencing funds for investment in circular business models in fashion and textiles:** EPR fees income must be ring fenced to support collection, sorting, reuse, upcycling, repair, and recycling of fashion and textiles across the whole of the UK.

Through an industry-led EPR framework, backed by new secondary legislation, the UK can revive UK textile manufacturing and continue to lead the world on achieving net zero by 2050.

The UK fashion and textiles industry is ready to work closely with Department for Environment, Farming and Rural Affairs (DEFRA) and Department for Culture, Media and Sport (DCMS) and connected government departments (primarily Department for Business & Trade DBT, Department for Science, Innovation and Technology DSIT, and Department for Energy Security and Net Zero DESNZ) to commit to undertaking the necessary research, consultation, pilot and testing to inform effective EPR legislation.



## 6 - The Case for tEPR in the UK Now

The UK needs EPR for fashion and textiles if it is to grow sustainably and deliver the government's growth and net zero missions. EPR provides the whole life cycle mechanism to accelerate reuse, upcycling and recycling of products and materials, whilst reducing the harmful environmental and biodiversity impacts of production.

There are seven critical reasons why now is the right time for government to work with industry to develop and bring forward legislation for variable EPR for fashion and textiles in the UK:

1. **Industry is leading the call:** There is broad consensus and significant momentum from across UK fashion and textiles businesses and trade bodies calling for EPR as the single most significant policy intervention to futureproof the sector and drive sustainable growth. Industry, in partnership with WEFT, is leading on developing a data-informed, research-driven EPR scheme and understands the challenges and complexities of shifting to a circular model.
2. **Growing evidence-base and intelligence-led:** EPR has a growing global track record as an effective and adaptable intervention that shifts business models towards circularity and reduces waste, emissions and pollution. With more countries adopting tEPR, and learning from EPR for other sectors (e.g. WEEE and packaging in the UK), there is a broad evidence base available to inform the introduction of effective tEPR. Tech innovations also mean the granular data at individual product level is now accessible, which will provide the rich 'recipe' information required for variable eco-modulated EPR fees. This intelligence-led approach will make EPR highly responsive, enable international comparison and competition, and create the strongest incentives for change.
3. **EPR provides ring-fenced funds for sustainable growth towards net zero:** EPR has the potential to be cost-neutral once set up, and generate significant ring-fenced funds for reinvestment in circular business models and recycling infrastructure. This investment is critical to enabling the devolved nations to deliver on the Environmental Act 2021. For example, in England EPR could leverage additional investment to enable successful achievement of the 2022 Resource and Waste Strategy<sup>xxii</sup> targets, including:
  - Halving household residual waste by 2042
  - Increasing municipal recycling rates to 65%
  - Reducing waste to landfill to less than 10% by 2035
4. **EPR creates a competitive level playing field to drive growth:** A level playing field creates fair and equitable competition critical to driving growth. Involving all companies and organisations along the value chain including producers, distributors, charities and online platforms, including SMEs also creates fair and equitable collaboration, critical to transition to a circular economy.
5. **EPR incentivises eco-design:** Variable EPR incentivises producers to make long-term shifts towards sustainable manufacturing by adopting eco-design principles. Adopting eco-design principles is seen as one of the most cost-and impact-effective ways to create products that are made from safe or recycled renewable inputs, to be made again, and to be used more, for longer.
6. **EPR strengthens and grows green economy:** EPR strengthens and grows businesses and green jobs dedicated to reverse-cycle activities e.g. collection, sorting, reuse, upcycling, repair, and recycling.
7. **EPR maintains the UK's competitive edge globally:** tEPR in the UK can align with forthcoming EU regulations in key areas, while setting a new global standard. Existing and forthcoming EU legislation provides the wider context for all UK fashion and textile businesses, with relevant policies split across Ecodesign for Sustainable Products Regulation (ESPR), the Waste Framework Directive and Waste Shipments legislation. UK businesses will have to align with the headline policies as they roll out, including for example on Digital Product Passports and eco-design requirements around durability and inclusion of a % of used materials in all new products.

## 7 - EPR Fees and Investment

CFIN strongly recommends a variable ‘eco-modular’ fee EPR.

Variable fees are critical to offering a roadmap to continuous improvement and stimulating eco-design principles. A variable fee means EPR is feasible and viable for all businesses and organisations, including SMEs and those with lower product volumes, to ensure the level playing field critical to an effective EPR.

Once set up, EPR has the potential to be cost neutral and generate significant income via a variable fee mechanism. All fees from EPR must be ring fenced for investment in transition of fashion and textiles to circular business models to incentivise continuous progress and ensure producers can meet their obligations under EPR legislation and stay internationally competitive. Data and evidence should also be used to inform the hierarchy of spend from EPR fees.

There are multiple options for approaches to distributing EPR funds, from working in partnership with existing funders and investors such as Innovate UK, to developing new public-private finance initiatives and funds. Further research should be done to inform the scope, design, and operating methods for an innovative range of finance options that meet sector needs. These should be clearly defined in the scope of the EPR legislation and in the responsibilities of the PRO body/bodies.

Industry is best placed to advise on the PROs hierarchy of spend. The PROs priority spending areas should be consulted on with industry regularly, and set progressively to tackle the hardest areas to secure private investment for. Spend should also be proportionate and progressive in relation to UK geography, recognising increased costs of working in rural areas, for example.

Recommended areas for EPR spend:

- Research and innovation in upcycling and recycling technologies and companies (particularly fibre-to-fibre recycling).
- Research and innovation into durable material innovation and eco-design.
- Investment in reuse across private, charity and public sector - reshare, rental and reuse platforms, charity sector and councils.
- Investment in businesses embedding and scaling circular practices (such as repair and resale) and design principles.
- Building of UK infrastructure to deliver textile waste management (collection, sorting, preparation for reuse, reuse and recycling of textiles, including increasing UK capacity to prepare fibres for recycling) across the UK, from Outer Hebrides to Isle of White.

## 8 - The Implementation Pathway

This pathway provides time for industry and government to work closely together to research and pilot fee levels and data reporting requirements. This will ensure resulting legislation is intelligence-led and weaves financial and decision-making incentives throughout to create a powerful mechanism for continuous improvement. With industry leading the call for EPR, governments must now enable and support industry to lead the next phase of research and piloting. Designing a phased approach means responsible government departments working closely with the fashion and textile sector to set milestones that balance urgency with the reality of current capacities.

A phased process to inform legislation is recommended within this Parliament. This timeline matches the roll out of EPR for packaging, and means the UK can align with EU legislation timelines on a voluntary basis. A phased approach is crucial to designing and delivering a mechanism that is fair and consistent across scales and complexity, and brings together eco-design principles and end of life policies. It enables organisations across the

supply chain to have the opportunity to feed in their expertise and data, and have the time to adapt and shift their practices.

The Environment Act 2021 grants UK ministers the powers to introduce EPR schemes for textiles and other priority waste streams via secondary legislation, streamlining implementation. DEFRA leads on policy development for EPR in England and should work with devolved governments to create a coherent UK-wide scheme.

Industry is ready to work with the government on implementing the legislative process, following the standard policy development route of a Green Paper, White Paper, and secondary legislation. To do this requires continuing investment and support from across government to enable further development of data quality and standardisation, and design of variable fee criteria in line with the approach set out in the 2024 EPR Variable Fee White Paper<sup>xxiii</sup>.

## **Implementation Pathway**

Below framework sets out the possible milestone outcomes across a four-phase Explore, Test, Commit and Implement pathway within this Parliament.

### **Explore**

- Green Paper development. Consult stakeholders across devolved nations and industry. Government and industry collaborate to identify and establish PROs and gather further intelligence to design an effective UK EPR system.

#### **Outcomes:**

- Government and industry begin work to define the scope, design, operating methods and responsibilities of the PRO compliance body.
- Government and industry begin work to identify one or more PRO bodies to operate effectively across the devolved nations of the UK.
- Industry-led PRO or PROs has been identified and set up to, with inclusive governance and staffing in place.
- Timeline setting out a pathway to legislation has been published, providing reassurance and certainty to industry and investors.

### **Test**

- Pilot the system with voluntary variable fee structures and data reporting standards, testing the viability of eco-modulated fees and incentives.

#### **Outcomes:**

- Voluntary data reporting has increased across industry, strengthening the research and intelligence on data reporting standards and variable fee-levels. Clear, standardised data reporting, harmonised internationally, will empower businesses with the information they need to make decisions on what to design, make and place on the market.
- Voluntary six-monthly data reporting for all size obligated producers is encouraged, increasing data quality to inform variable fee-levels and international alignment.
- Voluntary fees income contributes to costs of one or more PRO set up.
- Voluntary eco-modulated EPR fees are being collected by the PRO. Eco-modulated fees offer clear financial benefits to producers using eco-design and sustainable principles.
- EPR variable fee methodology and reporting standards have been agreed, and align internationally to support data harmonisation.

- Research and consultation with industry has produced recommendations for evidence-based hierarchy of spend for PRO fees.

## Commit

- Publish White Paper. The UK government passes secondary legislation with a clear timeline to full implementation and secures royal assent.

## Outcomes:

- A mandatory variable tEPR in the UK is set out in a King's Speech within this parliament.
- White Paper process.
- Voluntary fees income covers the running costs of the PRO and innovative distribution of funds via PRO begins in line with industry-consulted and evidence-based hierarchy of spend.
- Evaluation of voluntary EPR Year 3 results in tweaks to fee-levels to optimise incentives and ensure level playing field.
- Final consultation with industry on implementation timeline and alignment with existing devolved nations strategies.
- Timeline for mandatory EPR implementation is communicated with industry with at least 12 months notice.

## Implement

- Phased implementation of a tEPR is rolled out.

## Outcomes:

- PROs are up and running across all devolved nations.
- PRO fees cover costs of PRO services, and additional funds raised are invested in line with industry consulted hierarchy of spend.
- Monitoring and evaluation ensures fees are regularly reviewed and updated to optimise incentives.
- Progress towards targets set out in EPR legislation are met.

## 9 - Conclusion

**The next steps are clear for the UK fashion and textiles industry and government:** further research, improvements in data and agreeing standardised reporting, piloting variable fee-levels via a voluntary model, communicating and consulting transparently and inclusively to engage all sides of the industry.

**The prize is significant:** sustainable growth and investment in support of a thriving sector.

tEPR will change the fundamental life cycle structures across fashion and textiles, strengthening and growing circular business models all along the supply chain to create sustainable economic growth, and ensure fashion and textiles contribute reductions in emissions to support net zero.

There is now a critical time frame for the UK government to signal support for a tEPR and include detailed recommendations for next steps in the work of the Circular Economy Taskforce.

The UK fashion and textiles industry is leading on research and innovation to inform an effective variable EPR scheme for textiles in the UK, and there is significant momentum and appetite building across the sector and internationally.

The UK fashion and textiles industry is ready to adopt a tEPR and needs this government to provide industry and investors with the certainty and reassurance necessary by setting out the intent to lay the groundwork for tEPR and commit to legislating within this Parliament.

# 10 - Appendix

## 10a - What do we mean by ‘textiles’?

In this paper, ‘textiles’ refers to fashion and textile products that are generally in scope of existing (or likely to come under future) EPR obligations: clothing, footwear, and household textiles such as bed linen. Products such as mattresses, technical textiles, and furniture with upholstery fall outside of the scope of this paper, as these are usually not covered under a tEPR policies, but instead are covered under separate EPR schemes (e.g. furniture) and have different collection systems.

This paper recommends following the criteria for products in scope as set out in the BRC report, Governing Principles for EPR<sup>xxiv</sup>:

1. Sufficient coverage of volume of products
2. Ability for these products to be collected, sorted and handled in the same waste management infrastructure and facilities.
3. Initial products in scope: apparel (clothing, footwear and other accessories), household and commercial consumer 2D textile products (such as 2D bedding, bathroom & kitchen textiles)
4. Future products in scope: curtains, upholstery and other 2D textile furnishings, 3D bedding (such as pillows and duvets)
5. Excluded from the scope: small non-textile accessories (e.g. jewellery, sunglasses etc), mattresses, carpets, furniture, leather products and technical workwear that is appropriate for, or requires, bespoke recycling systems.

## 10b - What is Extended Producer Responsibility (EPR)?

EPR is an environmental policy approach in which a producer’s responsibility for a product is extended to the post-consumer stage of the product’s life cycle.

Under EPR legislation, businesses that place products on the market (“obligated producers”) become responsible for managing their products when these are discarded by consumers. In the context of textiles, obligated producers are typically brands, retailers, and online markets that place clothing, footwear, and household textiles on the market. The responsibility imposed on these producers may be financial (collecting and investing fees), operational (meaning the PRO has responsibilities for e.g. waste collection, often collaborating with e.g. local councils), or both. CFIN recommends both for the UK.

EPR can also apply to distributors of products, where distributors also take on collection cost responsibilities as happens with Waste from Electrical and Electronic Equipment (WEEE).

EPR is a performance-based regulation in which specific outcomes and objectives are set and defined by law, and so are the roles and responsibilities of stakeholders involved in delivering on these (such as obligated producers, local governments, charities, and non-profit operators).

Generally, companies can fulfil their responsibility individually, by putting in place their own collection, sorting, reuse, and recycling systems, or collectively, by joining efforts to establish a shared system. Collective EPR can generate significant economies of scale, especially in collection and sorting. CFIN recommends putting in place a collective EPR scheme, while giving companies the option of fulfilling their responsibilities individually to give as much flexibility to industry as possible.

EPR has traditionally focused more on the end of life of products. The most effective EPR schemes being designed now incorporate the full product life cycle. This is crucial to closing the gaps and supporting the innovation and



capacity needed to transition to a full circular economy for textiles. CFIN recommends EPR incorporating the full life cycle.

## 10c - What is a Producer Responsibility Organisation (PRO)?

In a collective EPR scheme, obligated businesses delegate their responsibility (fully or partially) to a third party. This third party is a joint PRO, which fulfils obligations for the in-scope products on the businesses' behalf, and coordinates the activities identified as within the scope of such a body. The legally obligated businesses pay the PRO, in order to cover the necessary expenses for achieving the legally required outcomes and objectives. A PRO is funded through variable 'eco-modulated' fees that each obligated producer pays to the PRO. It is not a tax, as the fee pays for a service, and collective investments such as recycling infrastructure. The fees cover the necessary expenses of achieving the legally required outcomes and objectives. All funds raised must be ring-fenced for reinvestment in circularity and sustainability of the sector.

There are examples of both single and multiple PROs managing EPR effectively in different countries. CFIN recommends exploring both options in the context of the devolved UK nations and regions to align PRO set up with existing legislation on waste management. Whether single or multiple, it is imperative that PROs create a joined up system and mitigate the risks of free-riding, double counting and loopholes emerging. Standardised data reporting must be managed by the PRO on a black box basis, guaranteeing security and commercial sensitivity for IP-and non-IP fashion and textiles brands.

A PRO should work together with, or include responsibilities and capabilities of, a compliance organisation that can assist with EU wide and global compliance. This would ensure that the PRO arranges all the contract and reporting obligations, and individual brands do not have to explore multiple different EPRs.

A PRO must have an inclusive governance structure, composed of diverse representation from across the whole fashion and textile value chain, governments, citizen organisations and environmental experts to become a trusted and effective body.

Further options for the set up of a PRO include potential to set collection targets for increasing the effectiveness of EPR. The establishment of targets can also distort the market, and must therefore be set with caution and informed by an assessment of costs and benefits as well as consultation with stakeholders. If targets are part of national legislation, the government has the power to impose fines on the PRO when targets are not met.

## 10d - What are the Alternatives to EPR?

There is a significant financial and environmental cost to not introducing EPR or opting for a piecemeal focus on individual elements of the textiles life cycle, eg. collection services.

A less joined up approach will create slower, more expensive change: collection, reuse, upcycling and recycling of textiles is unlikely to be meaningfully scaled, with rural areas at particular risk of being underserved on textile waste collection options. Millions of tonnes of textiles will continue to be landfilled, incinerated, or leak into the environment every year.

In the UK, the financial cost of landfill and incineration is borne by local councils, and in turn, local people via council tax. Due to the international nature of the fashion and textiles sector, the costs to consumers, the environment, and biodiversity are global. The public health impacts of textile waste and chemical pollution affect UK residence, and are particularly destructive across the global south, where the majority of textiles currently collected in the UK end up<sup>xxv</sup>. Not introducing mandatory variable EPR will mean UK textiles will continue to have a negative impact on the health and environment of marginalised communities across the world.

## 10e - EU Legislation - Current State of Play

While EU legislation does not apply to the UK since its departure from the EU, UK companies will need to align with EU legislation to be able to continue to trade across the EU. Below sets out the current state of play for the two most relevant areas of EU legislation for UK textiles: EU Waste Framework Directive (WFD) and Ecodesign for Sustainable Products Regulations (ESPR)<sup>xxvixxxviiixxviii</sup>.

### European Waste Framework Directive

In June 2022, the European Commission launched a consultation on revising the (Waste Framework Directive (WFD) and, in July 2023, the Commission formally proposed a revision of the EU rules on waste, targeted at food and textile waste. Under the existing WFD, on 1 January 2025, the obligation to separately collect textiles entered into force in the EU. On 18 February 2025, the European Commission agreed on mandatory targets for food waste and an extended producer responsibility for textiles (tEPR) system as part of the revision of the WFD. The final form of the WFD is now expected to pass through the European Council and be adopted into legislation by the European Parliament. EU countries will now have to implement extended producer responsibility for textiles (tEPR) to cover the costs of collecting, sorting and recycling waste textiles. The systems will need to be in place within 30 months of the WFD changes coming into effect. They will be required to apply to micro-enterprises 12 months later.

The regulation is to include all producers, including those operating online marketplaces. It will apply to clothing, accessories, footwear, blankets, bed linen, kitchen linen, curtains and hats. Each state may choose to include mattresses. Negotiators also agreed that member states should address ultra-fast fashion and fast fashion practices when setting out the financial contributions to the tEPR schemes.

### Ecodesign for Sustainable Products Regulation

The Ecodesign for Sustainable Products Regulation (ESPR) entered into force on 18 July 2024, and is the cornerstone of the European Commission's approach to more environmentally sustainable and circular products. It aims to significantly improve the sustainability of products placed on the EU market by improving their circularity, energy performance, recyclability and durability.

The ESPR introduces a Digital Product Passport (DPP), a digital identity card for products, components, and materials, which will store relevant information to support products' sustainability, promote their circularity and strengthen legal compliance; a ban on the destruction of unsold textiles and footwear, and mandatory reporting of unsold products; and mandatory green public procurement for specific products.

## 10f - Relevant UK government departments

The Department for Environment, Farming and Rural Affairs (DEFRA) is the key government department responsible for waste management and existing EPR schemes. The relevant UK government audiences across the upstream supply chain themes are:

- DESIGN: Department for Culture, Media and Sport (DCMS), DEFRA, Department for Science, Innovation & Technology (DSIT)
- SOURCING: DCMS, DEFRA, Department for Business & Trade (DBT), DSIT,
- MANUFACTURING: DCMS, DEFRA, DBT, DSIT, Department for Energy Security and Net Zero (DESNZ)

## 11 - Bibliography

- 
- <sup>i</sup> [https://instituteofpositivefashion.com/uploads/files/1/IPF\\_ForumReport\\_2025.pdf](https://instituteofpositivefashion.com/uploads/files/1/IPF_ForumReport_2025.pdf)
- <sup>ii</sup> [https://instituteofpositivefashion.com/uploads/files/1/CFIN\\_Report\\_2025\\_v4.pdf](https://instituteofpositivefashion.com/uploads/files/1/CFIN_Report_2025_v4.pdf)
- <sup>iii</sup> <https://www.gov.uk/government/groups/circular-economy-taskforce>
- <sup>iv</sup> The Fashion & Textile Industries Footprint in the UK, 2024. Available at: <https://ukft.org/industry-footprint-report/>
- <sup>v</sup> WRAP, 2024. Textiles Market Situation Report [online] Available at: <https://www.wrap.ngo/resources/report/textiles-market-situation-report-2024>
- <sup>vi</sup> Invest 2035: Modern Industrial Strategy. Available at: <https://www.gov.uk/government/consultations/invest-2035-the-uks-modern-industrial-strategy/invest-2035-the-uks-modern-industrial-strategy>
- <sup>vii</sup> The Fashion & Textile Industries Footprint in the UK, 2024. Available at: <https://ukft.org/industry-footprint-report/>
- <sup>viii</sup> WRAP, 2024. Textiles Market Situation Report [online] Available at: <https://www.wrap.ngo/resources/report/textiles-market-situation-report-2024>
- <sup>ix</sup> European Parliament 2021. The impact of textile production and waste on the environment (infographic). Available at: <https://www.europarl.europa.eu/topics/en/article/20201208STO93327/the-impact-of-textile-production-and-waste-on-the-environment-infographics>
- <sup>x</sup> Ellen MacArthur Foundation 2024. Pushing the Boundaries of EPR Policy for Textiles [online] Available at: <https://www.ellenmacarthurfoundation.org/epr-policy-for-textiles>
- <sup>xi</sup> British Fashion Council, Julie's Bicycle, DHL, University of the Arts London (UAL) Centre for Sustainable Fashion, 2019. Fashion and the Environment Whitepaper. Available at: <https://drive.google.com/drive/u/0/folders/1fA-mg560N2CnhOpaz-2usRGuJnH5qjfa>
- <sup>xii</sup> Institute of Positive Fashion 2021. The Circular Fashion Ecosystem Report [online] Available at: <https://instituteofpositivefashion.com/CircularFashion-Ecosystem>
- <sup>xiii</sup> Institute Positive Fashion/British Fashion Council, 2021. Designing the Green Transition. Available at: <https://instituteofpositivefashion.com>
- <sup>xiv</sup> Global Action Partnership on EPR, 2025. Available at: <https://gap-epr.prevent-waste.net/>
- <sup>xv</sup> Defra 2022. Resources and Waste Strategy for England. Available at: <https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england>
- <sup>xvi</sup> Scotland's Circular Economy Waste Strategy and Route Map 2024. Scottish Parliament. Available at: <https://www.gov.scot/publications/scotlands-circular-economy-waste-route-map-2030/>
- <sup>xvii</sup> Global Fashion Agenda 2024. Mapping of Global EPR for Textiles. Available at: <https://globalfashionagenda.org/resource/mapping-of-global-extended-producer-responsibility-for-textiles-epr/>
- <sup>xviii</sup> British Retail Consortium, 2023. Governing Principles for EPR. Available at: [https://brc.org.uk/media/gg2htdlp/epr-governing-principles\\_finalv2.pdf](https://brc.org.uk/media/gg2htdlp/epr-governing-principles_finalv2.pdf)
- <sup>xix</sup> WEFT 2024. EPR Variable Fee White Paper. Available at: <https://weft.org.uk/whitepaper/>
- <sup>xx</sup> WRAP 2021. Textiles 2030 Roadmap. Available at: <https://www.wrap.ngo/resources/guide/textiles-2030-roadmap#download-file>
- <sup>xxi</sup> OECD, 2024. Extended Producer Responsibility: Basic facts and key principles, OECD Environment Policy Papers. Available at: [https://www.oecd.org/en/publications/extended-producer-responsibility\\_67587b0b-en.html](https://www.oecd.org/en/publications/extended-producer-responsibility_67587b0b-en.html)
- <sup>xxii</sup> Defra 2022. Resources and Waste Strategy for England. Available at: <https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england>
- <sup>xxiii</sup> WEFT 2024. EPR Variable Fee White Paper. Available at: <https://weft.org.uk/whitepaper/>
- <sup>xxiv</sup> British Retail Consortium, 2023. Governing Principles for EPR. Available at: [https://brc.org.uk/media/gg2htdlp/epr-governing-principles\\_finalv2.pdf](https://brc.org.uk/media/gg2htdlp/epr-governing-principles_finalv2.pdf)
- <sup>xxv</sup> Global Action Partnership on EPR, 2025. Available at: <https://gap-epr.prevent-waste.net/>
- <sup>xxvi</sup> European Commission 2024. Ecodesign for Sustainable Products Regulation [online] Available at: [https://commission.europa.eu/energy-climatechange-environment/standardstools-and-labels/products-labelling-rules-andrequirements/ecodesign-sustainable-productsregulation\\_en](https://commission.europa.eu/energy-climatechange-environment/standardstools-and-labels/products-labelling-rules-andrequirements/ecodesign-sustainable-productsregulation_en)

---

<sup>xxvii</sup> European Commission 2023. Circular economy for textiles: taking responsibility to reduce, reuse and recycle textile waste and boosting markets for used textiles [online] Available at:  
[https://ec.europa.eu/commission/presscorner/detail/%20en/ip\\_23\\_3635](https://ec.europa.eu/commission/presscorner/detail/%20en/ip_23_3635)

<sup>xxviii</sup> European Commission 2024. Ecodesign for Sustainable Products Regulation [online] Available at:  
[https://commission.europa.eu/energy-climate-change-environment/standards-tools-and-labels/products-labelling-rules-and-requirements/ecodesign-sustainable-products-regulation\\_en](https://commission.europa.eu/energy-climate-change-environment/standards-tools-and-labels/products-labelling-rules-and-requirements/ecodesign-sustainable-products-regulation_en)



BRITISH  
FASHION  
COUNCIL



Innovate  
UK

ukft