

How policy will
affect the future
of textile waste
and impact
business



YODOMO

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Executive summary

This research looks at the incentives for businesses to begin exploring more sustainable routes to manage textile waste. In light of the growing concern about our impact on the climate and the sustainability of the goods we produce, governments across the world are researching and implementing measures to reduce textile waste. One such measure is Extended Producer Responsibility, or EPR, a legislative strategy that holds producers accountable for the environmental impact of materials they circulate. Whilst the discourse around textiles EPR in the UK is still in its infancy, the forecast points to developments in this area.

In this report, we cover three primary areas: UK textile policy, EU policy, and non-legislative incentives to begin the transition into a circular economy. Some key takeaways are as follows:

- The UK has seen a shift towards taking greater action promoting sustainable business practices. However, environmental plans for textile waste are still in development.
- EU legislation requires action on textile waste by 2025, with various strategies employed by member states.
- There exists numerous non-legislative incentives for businesses to focus on textile waste management, including B-Corp certification and CSR (Corporate Social Responsibilities) directives.

What is certain about the UK textile industry is that more businesses will begin to feel substantial pressure to improve its waste management in the future. However, the rate and way in which UK businesses should work towards the goal is less obvious, especially in light of UK policy uncertainty.

This research has been jointly produced by Yodomo and LSE as part of a Practera project. With thanks to Sandy Di Yu at Yodomo; Samuel Eaglesham, Alexandria Hurst, Emilija Krysen, Kolahta Asres-loaband, Juhyeon Eom from LSE, and Louise Moran at Practera.

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Executive summary

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- There exists numerous non-legislative incentives for businesses to focus on textile waste management, including B-Corp certification and ESG (Environmental, Social and Governance) directives.

What is certain is that more businesses will need to adopt more sustainable waste management in the future. The rate and way in which UK businesses should work towards the goal, however, is less obvious especially in light of UK policy uncertainty.

This research has been jointly produced by Yodomo and LSE as part of a Practera project to better understand the impact of incoming legislation and the other factors that are influencing commercial waste strategies.

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Textile waste in the UK: the issue at a glance

206

thousand tonnes of textile
waste produced in the UK
each year.

0.8

kg incinerated yearly per
person.

1.7

kg disposed of in landfills
annually per person.

4TH

largest producer of textile
waste in Europe.

1



About Yodomo

Yodomo collaborates with businesses and local governments on sustainable solutions to textile waste, that helps the planet and supports the local communities that businesses operate in. It was awarded the ‘Progress toward circularity’ Award at the Marie Claire Sustainability Awards 2023.

In light of the rapidly evolving political climate surrounding textile waste (especially as it relates to the UK’s highly anticipated EPR scheme), this report seeks to outline the policy context of textile waste as it stands currently.

Understanding EPR

EPR, or Extended Producer Responsibility, is a legislative strategy which holds producers accountable for the materials they circulate throughout the entire resource lifecycle.

EPR is achieved through a system of ‘modulated fees’ (WRAP, 2023)², where fees are applied to producers who fail to reduce the environmental impact of their products. Responsibility encompasses the entirety of a product’s lifecycle, from unsustainable product design to collection, recycling and sorting of used materials.



UK plans for EPR

“...a question of when, not if.”

An implementation of EPR for textiles in the UK is still in the research and consultation phase. Though the recent WRAP report produced for the Department of Environment, Food and Rural Affairs (DEFRA) emphasises EPR as ‘the core for any policy framework’² dealing with textile waste, there is no defined timeline for when potential EPR legislation might be introduced.

Whilst plans for EPR for textile waste in the UK are still developing, UK environmental strategy and recent government announcements suggest that the introduction of EPR for textiles is a question of **when, not if.**



UK plans for EPR

In July 2023, UK Environment Minister Rebecca Pow announced a new scheme for recycling and reusing materials, referred to as “Maximising Resources, Minimising Waste” (Department for Environment, Food, and Rural Affairs, 2023)³.

This government-funded long-term plan aims to minimise wasted resources in a variety of sectors including the textiles industry. The plan identifies textiles alone as a “priority waste stream”³, with consultations with businesses being brought forward in recognition of the urgency of the problem.

Wider UK environmental strategy, including the government’s “Resource and Waste Strategy” as well as the “25 Year Environment Plan”, include aims of eliminating avoidable waste by 2050⁴, and halving textile waste in the next 10 years. This would likely necessitate the introduction of an EPR scheme.

Recent research from IPSOS indicates sustainability is the greatest priority for fashion consumers.⁵ Moreover, according to YouGov, most of the population believe that companies should be financially responsible for textile waste.⁶



UK plans for EPR

Has there been a recent anti-green shift from the UK government?

Any predictions must come with a caveat. The UK's political climate is unpredictable, and plans are subject to change - especially those not in the legislative stage. In late July of 2023, the long-anticipated EPR scheme for packaging in the UK had deferred plans of charging businesses fees from the Autumn of 2024 to 2025⁷. This deferral has been met with frustration, though experts stress that it was not unexpected, with hopes for greater clarity in policy decisions soon (Quinn, 2023)⁸.

However, the issue remains: without a published plan from the government, the situation surrounding EPR for textile waste remains uncertain.

Would EPR in the UK work?

As evidenced by a social cost benefit analysis by Defra and Eunomia Research and Consulting¹⁰, the introduction of an environmental bill or textile-related EPR could be a significant way to facilitate the shift to a circular economy. While EPR is a powerful tool, this transition would be most successful in combination with other policies. Example measures endorsed by WRAP¹¹ include developing eco-design criteria, granting loans to develop new infrastructure for recycling and more restrictions on landfill and incineration.



UK plans for EPR

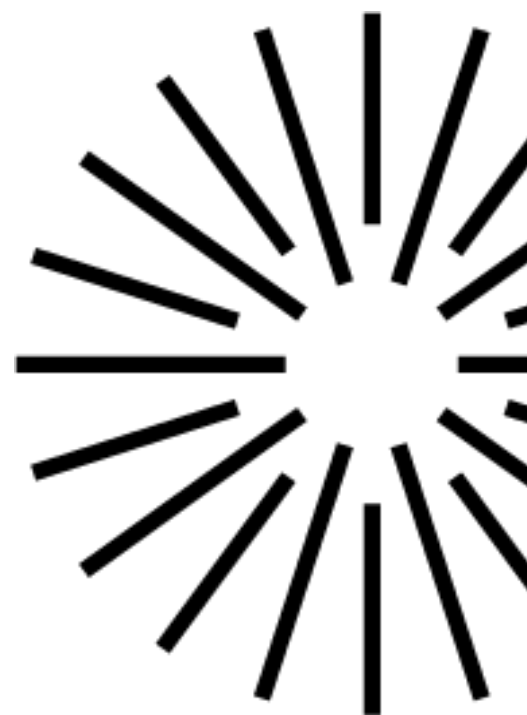
Data and traceability

Data collection and traceability systems would likely be the primary mechanisms by which producers of textile waste would be held accountable for post-consumer waste ¹¹.

Textile manufacturers would have to submit both external and internal data reports for each stage of the process - collection, sorting, recycling and disposal.

In their annual ESG reports, companies would be required to disclose data regarding¹²:

- Volumes
- Material compositions
- Cost structures
- Market dynamics
- Product durability
- Recycled content
- Recyclability
- Use of low-impact materials



Wales

Wales implemented the 'Well-being of Future Generations Act' in 2015, and since then have been introducing policy to ensure they lead on sustainability. One such policy comes into effect in April 2024, where businesses will need to separate their waste collections the same way that households do.

This is part of the country's aim of zero waste and reduced carbon emissions by 2050. What needs to be separated and collected separately are, from the [Wales government website](#), as follows:

- food – for premises that produce more than 5kg of food waste a week
- paper and card
- glass
- metal, plastic, and cartons and other fibre-plastic composite packaging of a similar composition
- unsold small waste electrical and electronic equipment (sWEEE)
- **unsold textiles**

This new policy will help reduce the amount of waste ending up in incineration or landfill, and simultaneously empower businesses to think creatively about materials that are continually increasing in price.¹³



EU policy and legislation

The EU's long term targets

- The EU Strategy for Sustainable and Circular Textiles will call for all textiles on the EU market to be "long-lived and recyclable, made as much as possible of recycled fibres" by 2030¹⁴.
- The EU Waste Framework Directive requires that such textiles be categorically separated by January 2025 at the latest, with EU governments including the Netherlands and France having already introduced EPR policy to regulate textile waste¹⁵.



The EU's significance

EU policy is relevant for predicting the direction of UK policy. The conclusion of the WRAP consultation report on textiles notes that, 'as the UK's largest trading partner'², harmonisation of EU and UK textile waste policy ensures continued UK competitiveness in the EU.

As such, it is anticipated that the UK policy will follow EU policy in guaranteeing the sustainability of textiles throughout the resource lifecycle.

EU strategy for sustainable and circular textiles

The industry is moving quickly towards sustainability in the textiles industry, but it's still early days, with more work around policy and standardisation that needs to happen. With that in mind, some of the most prominent policy proposals to improve regulation and accountability are as follows:

- a standardised “Digital Product Passport (DPP)” to enhance sharing information of textiles among all stakeholders in the value chain¹⁶
- regulatory instruments such as:
 - reduction of VAT for repair services or second-hand clothes
 - EPR for incentivising eco-design of textiles and innovative green industry solutions
 - mandatory due diligence under the upcoming Sustainable Corporate Governance Directive and the Corporate Sustainable Reporting Directive¹⁶

For now, there are several forthcoming changes in the legislation landscape in the EU to become familiar with. These include the following¹⁷:

- EU waste legislation to establish a separate collection of textile waste by the 1st of January 2025 and new targets for re-use and recycling of textiles by 2024
- Eco-modulation of fees under EU EPR rules for textiles as a part of the ‘Waste Framework Directive in 2023’
- Ecodesign requirements for textiles by 2025 or 2026, with the following key indicators:
 - recycling and waste prevention
 - measures to counter the destruction of unsold consumer products
 - public disclosure of information regarding unsold consumer products¹⁹
- A revision of the EU Ecolabel criteria for textiles and footwear in 2024 will support its uptake among producers and help consumers choose eco-friendly textile products¹⁹



EU strategy for sustainable and circular textiles

The Circular Economy Action Plan is one of the pillars of the European Green Deal, providing direction for the European commission on the textiles industry²⁰. Its aim is to guide the EU's transitions towards a circular economy with measures including the establishment of ecodesign measures that ensures textile products are fit for circularity with the use of secondary raw materials.

Other measures include dealing with the presence of hazardous chemicals, encouraging the use of sustainable textiles and providing easy access to re-use and repair services. The Circular Economy Action Plan also initiated the adoption of an enhanced waste policy, which works to prevent waste and promote circularity with obligations to share information on waste and setting waste targets.²¹

Other initiatives and policies that the European Commission has instituted include post-consumer textile waste management with the 'ReSet the Trend' campaign, which works with ambassadors to encourage behaviour change in consumers.²² Others include knowledge and skills development in sustainable and ethical textiles and apparels through the initiative ECOMODA²³.

There have also been further policy recommendations within the EU to increase funding and investments for the production of resource-efficient textiles as well as leveraging Public-Private Partnerships collaborations among SMEs, as a way to promote innovation in the sector, and technology voucher schemes to support textile SMEs in the transition towards more efficient production equipment²⁴.



Incentives, implementation and regulatory mechanisms

The EU provides incentives and support for businesses that adopt product-as-service models, use circular materials and production processes, and provide international cooperation for increased transparency²⁵

Additionally, they co-created the Textiles Ecosystem Transition Pathway, a policy report published in June of 2023 which identifies around 50 actions that supports the transition towards a greener and more digitally-integrated future.²⁶

There are also several upcoming regulatory mechanisms under the EU strategy for businesses and member states, including new ecodesign requirements for textiles, clearer information, a Digital Product Passport and a mandatory EPR²⁷.

There will also be measures to tackle the unintentional release of microplastics from textiles, policies to ensure the accuracy of green claims, and support for circular business models, including reuse and repair services.

Companies will be required to reduce the number of waste collections they have per year and will need to take responsibility for and minimise their carbon footprints. Member States will also be called on to adopt favourable taxation measures for the reuse and repair sector, and the EU Commission will support these policies with awareness-raising activities.

The EU Waste Framework Directive

The European EPR comes from their Waste Framework Directive, which outlines basic waste management principles. The Directive is a comprehensive overview of how waste should be managed, and establishes a 5-step waste hierarchy for all member states to adhere to.

The Directive sets out goals for member states to achieve within certain timeframes. The next targets state that “the preparing for re-use and the recycling of municipal waste shall be increased to a minimum of 55 %, 60% and 65% by weight by 2025, 2030 and 2035 respectively”.²⁸

In 2023, there was a proposed amendment to the Directive which focuses on the sustainable management of textile waste and to activities its aims with the EU Strategy for Sustainable and Circular Textiles.

The amendment proposes a mandatory and harmonised EPR schemes for textiles, which is in line with the requirement for member states to set up separate collections of textiles by the beginning of 2025, as per EU rules on waste. This proposal will promote innovations in the area of textile circularity, and reduce illegal waste shipments to non-EU countries under the guise of reuse intentions.²⁸

[Find out more about the EU Waste Framework directive.](#)



Waste Hierarchy, from EU Waste Framework Directive

Non-legislative incentives

Whilst new policies mean companies who are responsible for large amounts of waste must change their practices to become more sustainable, many other organisations are **staying ahead** of policy to ensure their business needs do not clash with the possibilities of a sustainable future. Such organisations often apply for certifications to assure their customer base, investors and supply chains of their commitments. These certificates range widely, with some requiring stringent audits to ensure compliance. The following are some of the certificates and non-legislative incentives that businesses are opting for.

B Corp:

The B Lab's sustainability certification, B Corp, can set businesses apart in how they treat people, the planet, and resources, including textiles. B Corp requires strict transparency and environmental standards to be met, as well as recertification every three years, proving that practices have stayed consistent and have improved with time (B Corp)²⁹. Consumers, for example, who seek ethical fashion with sustainable supply chains often seek B Corp certified businesses, and this trend is predicted to increase with time^{30 31 32 33 34 35}.

Fairtrade:

Fairtrade provides certification for consideration by consumers. To be Fairtrade certified, businesses must show transparency in the supply chain of resources and labour. Rather than putting emphasis on accountability measures for post-consumer waste, such as textiles,³⁶ Fairtrade groups encourage environmentally-friendly policies and awareness in consumers that ultimately lead to profit-led accountability and incentives^{37 38}.

Global Organic Textile Standard:

Another certification which has gained a strong positive reputation is the Global Organic Textile Standard, otherwise known as GOTS. This organisation prides itself on high standards for the entire textile supply chain, but is notably weak on its standards or policies for textile waste. GOTS could achieve a greater impact by expanding its aim from textile supply chain to textile lifecycle³⁹.

ESG

“...in 2020 approximately \$35 trillion in assets were being managed in accordance with ESG principles”

ANDREW MICHAEL, FORBES ⁴⁰

Increased awareness in consumers coupled with the various business legislations that have come into effect in the past few years addressing social responsibility has sparked interest in ESG, or Environmental, Social and Governance. Similar to CSR (Corporate Social Responsibility) but with a more quantitative measure of the aims, ESG requires companies to set measurable targets and perform audits to ensure these targets are achieved.⁴⁰

Used by prospective investors to gauge non-financial aspects of organisations, ESG encourages companies to act responsibly and to adhere to environmental standards. Companies are increasingly adopting ESG measures, which is reflected in the increase in ESG-linked executive pay and ESG investing of recent years. However, because ESG is self-implemented, measured, and reported, there are those who remain sceptical of their efficacy, as well as those who maintain that these issues should be government-led rather than market-led.

Environmental

The most straightforward part of ESG is probably the E, which takes into account environmental impact including carbon footprint, waste output, and supply chains, all of which are more or less measurable. Environmental pledges are taken by companies in order to aim for lower emissions, pollution, waste, and overall impact.

Social

The social aspect of ESG covers all components of EDI (equality, diversity and inclusion) as well as safety and security, employee satisfaction, community outreach, customer and supplier relationships, and corporate social responsibility.

Governance

Governance within ESG is largely about how a company is run, including how managers and shareholders interact and overall corporate culture.

These three aspects of ESG are not mutually exclusive, and indeed often feed into one another. ⁴⁰

ESG

“The number of firms that designate ESG metrics as key performance indicators for executives grew from just 3% in 2010 to 38% in 2021.”

PATRICK J. KIGER, STANFORD GRADUATE SCHOOL OF BUSINESS⁴¹

ESG and KPIs

ESG is used at some companies as a key performance indicator (KPI) to determine what executive compensation should be. The use of this metric has grown from 3% to 30% in 11 years, from 2010 to 2021, indicating a trend towards putting more importance on aspects of business other than profit and growth. This undeniable rise in the adoption of ESG is indicative of growing concern, from consumers to partners and investors, that companies should be focused on longer-term financial stability and risk management. Because ESG incorporates various aspects of how an organisation deals with the wider scope of environmental and social issues in addition to how it's internally run, ESG may be a better indicator of a company's prospective health than the mere numbers of traditional KPIs.⁴¹

Does ESG work?

A recent study by senior fellow at the Stanford Institute for Economic Policy Research Stefan J. Reichelstein conducted an exploration of ESG pay for executives that looked at both company impact and turnover. The study found that whilst there was no convincing evidence of a correlation between ESG pay and financial performance, companies that have adopted ESG pay for executive compensation did achieve better performance in their ESG metrics.

The study suggests that “superior ESG performance may yield long-term financial benefits for shareholders that are not yet captured in accounting earnings or/and stock prices”. If short-term spikes in profit are what a company aims for, perhaps ESG pay isn't the right way to go. But for sustainable businesses who understand that finance is tied inextricably to the larger systems of society and planet, it appears that ESG is much more than mere “window dress”, as Reichelstein says.⁴²

ISO 14001 certification

The ISO 14001 standard is a universal cross-sector standard defining the criteria for an effective environmental management system, or EMS - the system through which a company controls how their processes, products and activities can impact the environment⁴³. An ISO 14001 certification means that the company's EMS is effectively aimed at reducing its impact on the environment and increasing its resource efficiency, with an emphasis on continual improvement.

This certification does not look at the actual environmental output of the company, nor does it have universal restrictions or limits on impacts - it instead only certifies that the company has a process placing environment at the heart of its business considerations. Moreover, it is a voluntary certification, aiming only to assist companies in improving their environmental performance. The certificate provides a general framework for businesses to better their environmental performance; there are no specific environmental requirements for particular sectors.



How does it relate to textile policy?

As a voluntary standard, ISO14001 certification is not compulsory under either UK or EU legislation, and there are no plans to make it so. However, there remain a great deal of incentives for businesses to become ISO14001 certified, despite the potential financial cost in doing so⁴⁴. ISO14001 provides multinational companies with a universal standard, eliminating the need for multiple certifications and labels, as well as easing the navigation of differing environmental requirements between countries. Any textile company wishing to conduct international trade may find it difficult to do so without being ISO14001 certified.



The ISO14001 certification prioritises and requires environmental regulation compliance. In light of confirmed EU legislation on textiles, and anticipated UK policy, ISO14001 certification and an effective EMS system would ease the adaptation process to new legislation and reduce risk of breaking regulations and incurring fines.

Additionally, customers are increasingly conscious of the sustainability of the products they buy, and ISO14001 certification demonstrates environmental leadership and credibility, building trust and confidence with consumers.

Despite the potential competitive advantages to becoming ISO14001 certified, a British Furniture Confederation survey in July 2022 found that only 44% of furniture companies were accredited to the standard, with 10% completely unaware of the standard's existence⁷².



The Furniture Industry Sustainability Programme

FISP is a voluntary initiative and certified sustainability programme aimed at driving best environmental practice in the UK furniture industry. Created in 2006 by the Furniture Industry Research Association (FIRA), FISP is a national benchmark for sustainable furniture practices and is led by its members, all of whom are top British furniture and interior design companies, including Herman Miller and Silent Night⁷³. The programme centres on sustainability issues relating to all aspects of the industry, from resource procurement to waste management, and its certification is increasingly desirable for public and private sector commissions⁴⁶.

The scheme also focuses on improving resource efficiency as well as reusing and recycling, all of which are important in increasing competitiveness and building consumer trust. However, according to the British Furniture Confederation, in 2022, 23% of furniture companies had not heard of FISP⁴⁷.



The Environmental Product Declaration

The Environmental Product Declaration (EPD) is a document that communicates transparent and objective third-party verified environmental data about the product in accordance with ISO 14025 standards, allowing evaluation of the product's environmental performance at each phase of the product's life cycle⁴⁸. ISO 14025 (Type III Environmental Declaration) is a guideline for conducting quantitative assessments and using various environmental information. It seeks standardisation in the framework, especially in a firm's execution of EPD⁷⁷.

Where does EPD fit into UK/EU policy?

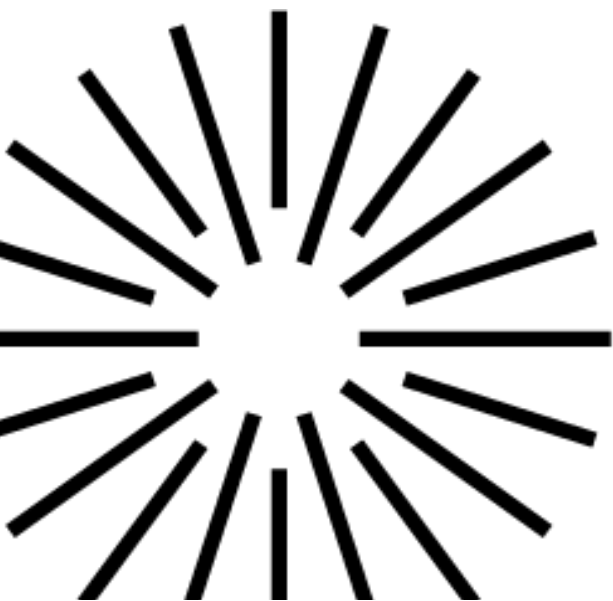
Under the schemes of the Green Deal and Circular Economy Action Plan, there is a growing need for manufacturers to transparently communicate about their environmental performance. Such a framework is imperative for productive businesses' communication, allowing: 1) the government to track business's compliance with environmental goals and 2) the building of trust between firms and environmentally focused consumers who are keen to know that the products meet certain environmental standards. While EPD is embedded in some enforceable legislation (directives) such as EU's EN15804 & EN15978 targeting the construction sector, the development of EPD in the textile industry (in EU/UK) rests entirely on the firm's voluntary participation⁷⁸. Having an EPD implies the product's superior environmental performance than the alternatives and thus presents an incentive for businesses.

Incentives beyond certification

Climate change poses a real and growing threat to businesses and to society. Many of the environmentally sustainable certifications that consumers seek, such as B Corp, Fairtrade, and GOTS mentioned above, focus significantly on the impact of textiles and of fast fashion. This is for good reason. An overwhelming majority of studies and statistics have demonstrated that fast fashion is a large contributor to tangible climate change⁵².

From production practices that harm the air to waste practices which pollute and harm marine life, textile-centred industries lack a respect for wildlife and the global natural world. This summer, the UN Secretary General, António Guterres, described the toll of these careless actions as “the era of global boiling”⁵³. July 2023 broke records around the world for the warmest summer ever recorded. As Guterres put it, “climate change is here, it is terrifying, and it is just the beginning.”

Textile waste must be managed to reduce its harm on the planet and to protect the longevity of earth’s habitability. Given the striking relevance of non-legislative incentives for businesses, the complementary actions of the government will only enhance an already existing drive for textile waste reform. Consumers long ago began the shift towards rewarding more ethical businesses, and the top businesses have already incorporated business model practices which reflect this shift. As climate change and the harmful role of textile waste become more widely recognised, there is an expectation that consumers will have little patience for unethical habits. Further educating the textile customer bases on the impact of poor waste systems will amplify this response.



Summary

To sum up, this report examined the vast policies and legislations landscape in the EU and the UK. Though there have been consultations about the introduction of an EPR scheme for textiles, there has yet to be a defined timeline for any implementation of such a scheme. Tackling and reducing textile waste seems to be a priority for the government but it is currently uncertain when and how this is to be done. However, there are some insights into how it could look for businesses when implemented. After a certain threshold of waste production, businesses would have to report extensively on both product specifications and disposal practices.

It is important to map the legal and policy landscape in the EU due to the close trading relationship with the UK textile, interior and fashion industry. Hence, discrepancies in the EU and UK policies and legislations could create complex import-export regulations and additional costs. Although there are no enforcement mechanisms for the EU strategy implemented yet, the current research indicates the existence of recommendations and guidelines for executing the new policies in the EU, alongside the anticipated mandatory EPR schemes and the 'Textiles ecosystem transition pathway' for businesses to follow. Consequently, it is imperative to monitor the evolving alterations in the legislative and policy framework.

The B Corp certification process encourages businesses to prove sustainability beyond a press release, and the reputation of B-certified companies are demonstrating this difference. However, clear connection and partnership with environmental groups and recycling or reusing initiatives can have a similar effect on business models. As legislation evolves, the businesses who have third-party verification mechanisms in place are most likely to thrive and effectively adapt.

There is also a wide variety of incentives for businesses to start focusing on waste management and the reuse of textiles, including legislation (particularly in the EU), the simplification of international trade, achieving certain certifications, as well as improving environmental reputation. For furniture and interior design businesses operating in the UK, however, sustainable textile waste management remains a choice, not a requirement.

About Yodomo

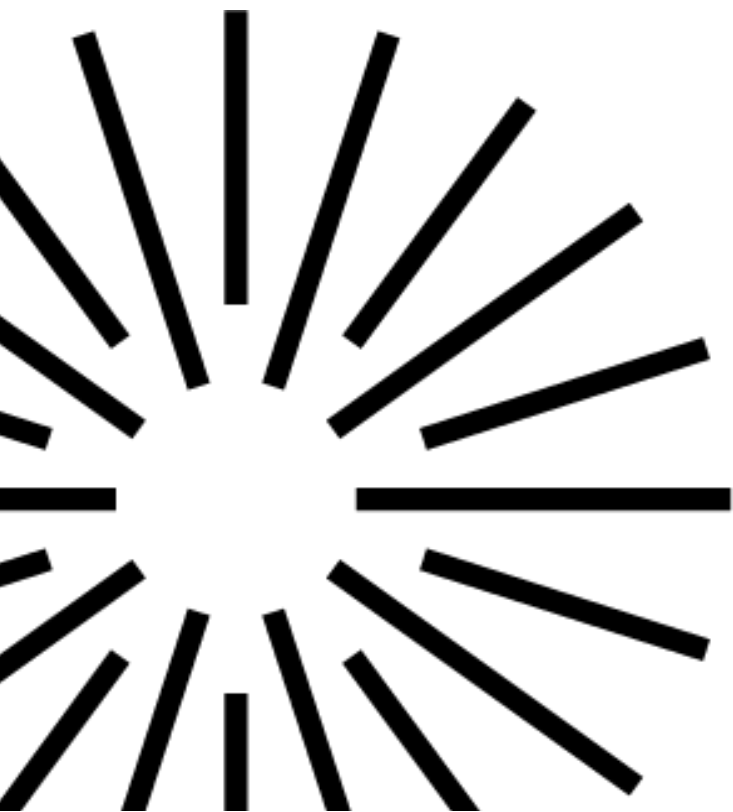
Yodomo is committed to helping businesses and local authorities achieve their sustainability goals around textile waste with practical, actionable strategies.

We stay ahead of the curve on policy and technology, so that those working with us will always be well-informed on the optimal ways to manage textile waste.

We're working on systems that will help collect data in order to make reporting easy. And best of all, we're centred around the pillar of community, so that the ESG strategies we help you develop are inherently tied to positive social impact.

Contact us to find out more about our sustainable textile waste service, creative and sustainability workshops, targeted reporting, community outreach and more.

Contact us Rachel at rachel@yodomo.co to find out more.



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