

Brussels, 10 June 2024

Subject: Remove 2nd-hand textiles from EPR scope under the revised Waste Framework Directive

Dear Ministers and Representatives of the Member States,

We are writing in the name of Adevinta, CrushON, Delcampe, eBay, OLX, Rakuten, Vestiaire Collective, Vinted, and associations Alliance française des places de marché and Fédération de la Mode Circulaire, representing key players in the European circular economy, particularly in the context of second-hand fashion and textile trade.

We have been following the developments on the revision of the Waste Framework Directive (WFD) with keen interest and would like to express our concerns regarding the Belgian Presidency's latest compromise text (dated 24 May) which, through its Recital 18a and Article 22a paragraph 6, proposes to bring second-hand textile products within the scope of Extended Producer Responsibility (EPR).

We believe this change would be detrimental to the European circular economy and could significantly hinder the thriving market for reused textiles, which grew by 18% just last year and could more than double by 2030¹. It would impose additional costs and administrative burdens on second-hand textile resellers, many of whom are small businesses that already have to battle against multinational fast-fashion companies. This could also ultimately reduce the incentive for the resale of textiles, thus leading to increased waste and reduced resource efficiency, in opposition to the very goals of the Directive.

Therefore, we respectfully request that the revision of the Waste Framework Directive removes any reference to “commercial re-use operators” as being potentially charged with an EPR contribution. Second-hand textile products made available by these operators have already been charged with a contribution when first sold as new, and should not be subject to further charges under the EPR framework.

To cover the costs for the waste management of those products, in particular in those Member States where there is a higher share of used textile products as explained by Recital 18a, we believe that policymakers should consider the creation of mechanisms that would enable Member States to compensate one another in function of the total volumes of products placed and of waste collected across the Single Market.

¹ Study on the market for circular fashion, Fédération de la Mode Circulaire & Accenture France, April 2024:
<https://federationmodecirculaire.fr/etude-sur-le-marche-de-la-mode-circulaire-x-accenture-france-2/>

Our organisations have long called for this, along with many other measures that would support a more harmonised EPR framework in the EU. We continue to believe that reducing the complexity of EPR rules is the only way for the EU to reach its ambitious waste reduction targets, while protecting the participation of small businesses, and growing the circular economy, in the Single Market.

We are committed to constructively engaging in the revision process and would welcome the opportunity to share our expertise and discuss this issue further with you.

Thank you for considering our position as we hope to contribute to a more sustainable European Single Market.

Sincerely,

Adevinta, CrushON, Delcampe, eBay, OLX, Rakuten, Vestiaire Collective, Vinted, Alliance française des places de marché and Fédération de la Mode Circulaire

Adevinta

CrushON

delcampe

eBay

OLX GROUP

Rakuten

Vestiaire Collective

Vinted

**ALLIANCE FRANÇAISE
DES PLACES DE MARCHÉ**

**FÉDÉRATION de
la MODE
CIRCULAIRE**