|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Section for correction | Text for correction  (line numbers) | Clear error or incorrect conclusion | Suggested new phrasing | Arguments that justify rephrasing | Techno-scientific evidence or literature (please upload if available) |
| e.g. title, subtitles, and 3.1.3.2 |  | The report should focus on waste textiles as a principle (e.g. title). |  | Preparation for re-use is also a waste management activity, and waste textiles can also be used, so there is no need to mention both e.g. in the title. In fact, this leads to a lack of distinction between waste textiles and second-hand (used) textiles (output of a preparation for re-use activity) (e.g. in 3.1.3.2). One is waste, the other not, and both are subject to different rules and regulations. The definition of waste englobes ‘any substance, material or object which the holder discards or intends or is required to discard’. Once discarded (waste), the material can be prepared to be re-used or recycled in line with the waste legislation and will cease to fall under it at the end of each of the processes in line with the EoW criteria to be developed. A clear distinction of waste/non-waste allows proper application of legal requirements for waste. This ensures the environmentally sound and qualitative management of waste textiles without grey zones, where waste textiles are handled as second-hand goods (not waste) avoiding traceability and proper management of the waste. |  |
| Section 1 |  | The need to scale up recycling does not only arise from the objectives of the EU strategy for sustainable and circular textiles, but from the Waste Framework Directive itself by introducing the mandatory separate collection of textiles. It should not affect the results, but it is important to mention the consequences of this mandatory separate collection from 2025 in the study’s objectives and its link to the Waste Framework Directive, as well as in the policy background:   * Article 10(4) WFD: *Member States shall take measures to ensure that waste that has been separately collected for preparing for re-use and recycling pursuant to Article 11(1) and Article 22 is not incinerated, with the exception of waste resulting from subsequent treatment operations of the separately collected waste for which incineration delivers the best environmental outcome in accordance with Article 4*. * Article 5(3) WFD: *Member States shall take measures in order that the following wastes are not accepted in a landfill: (g) waste that has been separately collected for preparing for re-use and recycling pursuant to Article 11(1) of Directive 2008/98/EC and Article 22 of that Directive, with the exception of waste resulting from subsequent treatment operations of the separately collected waste for which landfilling delivers the best environmental outcome in accordance with Article 4 of that Directive*. |  |  |  |
| section 4.3.5.2 |  | In relation to the outlook on recycling capacity in the EU (section 4.3.5.2), the impact of mandatory recycled content should be addressed. |  | Much investments are needed in scaling up these technologies will only work if policies will require producers/retailer to use certain quota of recycled materials. The report looks at the development of recycling capacities for packaging, but only until 2006 whereas major developments happened afterwards, with the implementation of the European Union’s Plastics Strategy and the Single-Use Plastics Directive, which gave a strong push to the plastic recycling industry to grow, e.g., due to mandatory recycled content requirements.[[1]](#footnote-1) The report should acknowledge and assess the potential of mandatory recycled content for textiles to scale up recycling capacities. |  |
|  |  | Another discrepancy is that the amount of textiles disposed of almost corresponds to consumption. |  | With regard to the different textile products, it can be assumed that the actual useful life is longer (than one year), so that disposed or separately collected textiles are likely lower in 2019. |  |
|  |  | The contents of tables 3 and 4 are not consistent. Companies with no recycling activities are included (e.g. Remitex, Retextil), but there is no proper distinction between advanced recycling versus recycling for application outside apparel industry, as the first table also lists recyclers that currently perform this service as their main activity. |  |  |  |
| (add more lines of needed) | | | | | |

1. <https://www.letsrecycle.com/news/europes-plastic-recycling-capacity-records-17-growth/> [↑](#footnote-ref-1)