



The EPR revolution in textiles

What EU legislation means for your business, and
why preparing now is a strategic imperative

dss⁺

Protect. Transform. Sustain.

The European textile industry is entering its most significant regulatory transformation in decades. With the adoption of Directive (EU) 2025/1892 amending the Waste Framework Directive, the EU has introduced mandatory Extended Producer Responsibility (EPR) for textiles and footwear across all Member States.

Member States must transpose the new textile and footwear EPR rules by 17 June 2027 and establish schemes by 17 April 2028.

For executives in the textile sector, these are not distant policy signals: they carry binding deadlines between 2026 and 2028 and will directly affect cost structures, supply chain operations, product design, market access, and brand reputation. Companies that treat this solely as a compliance exercise risk being overtaken by competitors who recognise the strategic opportunity embedded in the transition.

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At a glance: **what boards should do now**

Now to 6 months

Confirm which legal entities are the producer in each EU market; identify which products are in scope; appoint clear cross-functional ownership across legal, finance, operations, sustainability, retail and data teams.

Next 6–12 months

Build an audit-ready placed-on-market dataset by country, product category and weight; begin modelling likely fee exposure and internal implementation costs; assess where retail or reverse logistics could be affected.

Throughout 2026–2027

Monitor national transposition closely in priority markets; assess likely PRO options and governance models; prepare for country-specific registration, reporting and authorised representative requirements.

Before April 2028

Be ready to register, join the relevant PRO structures, operationalise reporting and controls, and embed EPR into budgeting, compliance governance and executive oversight.

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EPR for textiles: the regulatory landscape

The revised EU Waste Framework Directive (2018/851/EC) mandated that all Member States establish separate collection systems for textiles by January 2025. Alongside this, the Directive requires producers to take financial and operational responsibility for the post-consumer phase of their products.

EPR shifts the cost of collection, sorting, reuse and recycling away from municipal authorities and taxpayers and onto those who place textile products onto the market. This applies to clothing, household textiles, footwear and accessories. The definition of 'producer' encompasses manufacturers, importers, and any company selling under its own brand name including e-commerce operators selling into the EU from third countries. As such, a wide range of business models, from global fashion groups to specialist importers to domestic retailers may fall within scope.

National implementation: a patchwork in progress

While the EU-level framework is established, national EPR schemes are still being implemented by Member States. France already has a long-standing textile EPR scheme through Refashion. Most other Member States are still developing their national legislation and operating models. This means many producers still do not know what scheme structures, fee methodologies, registration deadlines, or collection models they will face in each market.

For businesses selling across multiple EU countries, the administrative burden of multi-country compliance is not trivial and should factor into operational planning now.

Key regulatory milestones to track:

- **Separate textile collection: EU Member State obligation in effect since January 2025.**
- **Member State national EPR legislation by 17 June 2027**
- **Textile and footwear EPR schemes to be established by 17 April 2028**

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How textiles EPR will work in practice

The revised EU Waste Framework Directive sets the framework, but the practical model will still be built through national legislation. Therefore, core producer obligations are clear in principle, even if some country-specific mechanics are still being defined. Nonetheless, producers must already start preparing for compliance.

What your obligations are as a textiles producer

If you place in-scope textile, textile-related, or footwear products listed in Annex IVc on the market of a Member State for the first time, you should expect the following core obligations:

- **Determine whether your products are in scope** and whether your entity is the producer for each market.
- **Register in each Member State** where you make in-scope products available on the market for the first time.
- **Appoint an authorised representative for EPR** where this is required under national law for cross-border sellers.
- **Entrust a Producer Responsibility Organisation (PRO)** to fulfil your textile EPR obligations on your behalf.
- **Report accurate data on products placed on the market**, including product scope and weight by country.
- **Pay the financial contributions** required under the relevant national scheme.
- **Maintain records and internal controls** that support accurate reporting and auditability.

The role of PROs

Under the new EU framework, Member States must ensure that producers register with a PRO to fulfil their textile EPR. A PRO is an authorised body that manages collective compliance on behalf of its member producers, organising the collection system, contracting with sorting and treatment operators, reporting to authorities, and allocating the financial burden across producers.

PRO governance will shape how much influence producers have over costs, service levels, transparency, and system evolution.

The importance of PRO governance is often underestimated by producers. Based on dss+ experience supporting both producers and PROs, governance design frequently becomes one of the most important determinants of scheme performance, stakeholder alignment and long-term cost effectiveness.

For example, dss+ has supported the development and operationalisation of producer responsibility systems in emerging EPR markets, including supporting the establishment of governance structures, stakeholder engagement mechanisms and producer participation models for national e-waste systems in Rwanda, as well as supporting the development of an industry-led PRO model for Kenya's off-grid solar sector.

These experiences provide dss+ with a practical understanding of how PROs are established, governed and operated, enabling us to provide producer-side advice informed by both regulatory requirements and operational realities.

IMPORTANT

PRO membership does not transfer legal responsibility

Joining a PRO transfers operational management of your EPR obligations to a shared system, it does not transfer legal compliance responsibility. Producers should think of PRO membership not as outsourcing compliance, but as accessing an infrastructure. Internal data quality, reporting processes, and contractual terms with the PRO all remain within your sphere of control and responsibility.

Costs of EPR

The level of financial exposure will depend on three variables: the volume placed on the market, the applicable national fee rates, and the way the local scheme is designed. In many markets, fee structures are not yet final because national implementation is still underway.

Producers can expect product-specific sustainability criteria to increasingly affect costs over time, as the EU requires financial contributions to be modulated on the basis of relevant ecodesign requirements adopted under the Ecodesign for Sustainable Products Regulation.

Companies should start mapping their volume and flow data now. Without a reliable view of what they place on each market, by product type and by weight, they will not be able to estimate fee exposure or make informed pricing and sourcing decisions.

While the most visible cost will be the producer EPR fees, less visible costs should also be expected including data remediation, reporting controls, legal support, systems changes, internal resource time, training, reverse logistics adjustments, and retail operating implications.

Potential Take-Back Obligations

The revised Waste Framework Directive does not itself create a general EU-wide in-store take-back obligation. However, some national models may decide to use retail as part of their collection infrastructure. If that happens, stores may need to allocate space for collection points, adapt customer-facing processes, train staff, manage storage and contamination, and coordinate onward logistics.

Producers should monitor national implementing legislation closely in all markets in which they operate, as requirements may vary significantly and could affect some retail networks more than others.

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Waste generation data, operational readiness and the dss+ approach

Data as a Foundation for EPR Readiness

While robust waste flow analytics are critical to understanding future collection requirements and potential fee exposure, successful EPR implementation requires significantly more than data modelling. Based on dss+ experience supporting producers, PROs, governments and industry associations across WEEE, batteries, packaging and electronics EPR systems, we have observed that the organisations best positioned for success are those that combine strong data foundations with operational governance, stakeholder engagement and implementation readiness.

dss+ combines regulatory understanding with operational execution capability, helping organisations translate evolving EPR requirements into practical business systems, reporting frameworks, governance structures and day-to-day operating processes.

To help address this gap, dss+ has developed a dynamic mass-flow analysis tool that estimates textile waste generation across all 27 EU Member States. The tool tracks annual waste generation from 2000 to 2024 across 16 textile categories, covering clothing, footwear, and household textiles.

The 2024 country-level waste estimates reveal the scale differences between Member States. National EPR systems are being designed in very different market contexts, and a one-size-fits-all model is unlikely to be effective. Waste-per-capita rankings provide a useful lens on relative market intensity and help identify where collection pressure and infrastructure needs are likely to be strongest.

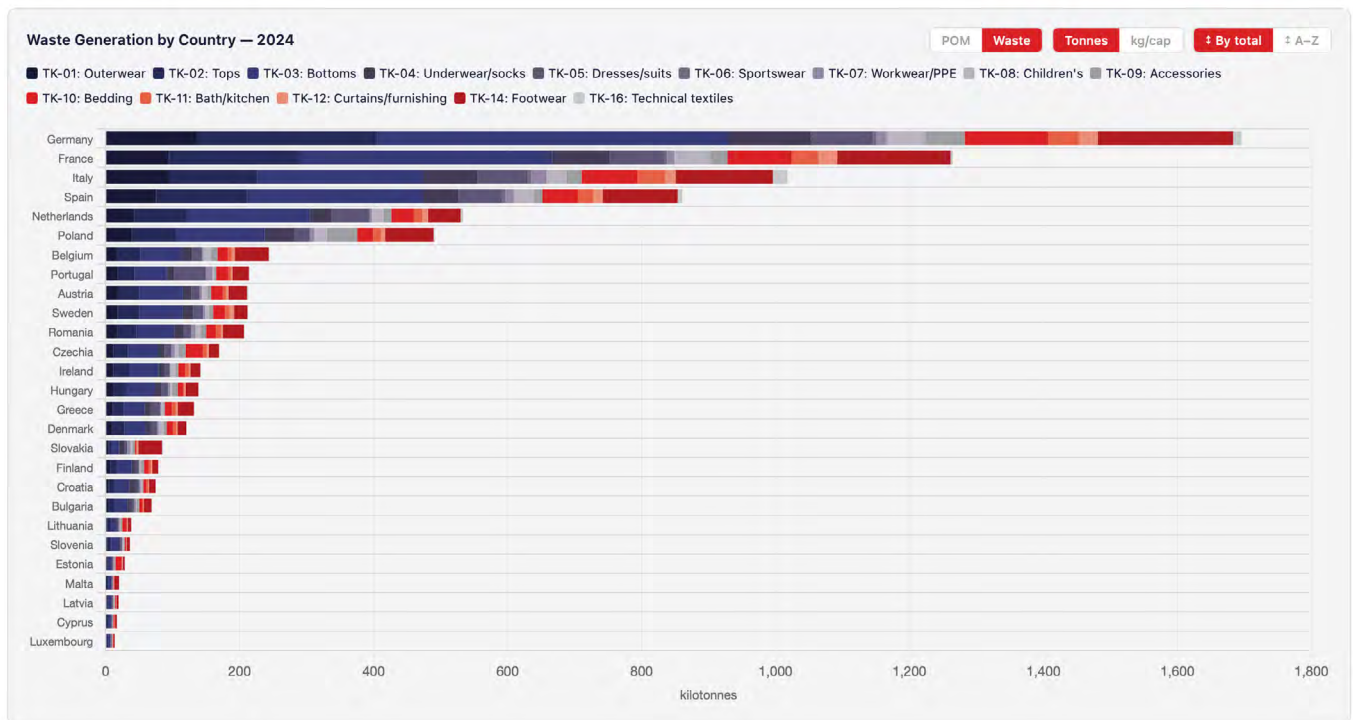


Figure 1: Breakdown of Textile Waste Generated by type across 33 EU-27 countries in 2024

The category breakdowns are also important. Different countries may generate different mixes of clothing, footwear, and household textiles, and those differences have implications for collection systems, sorting requirements, and likely recycling pathways.

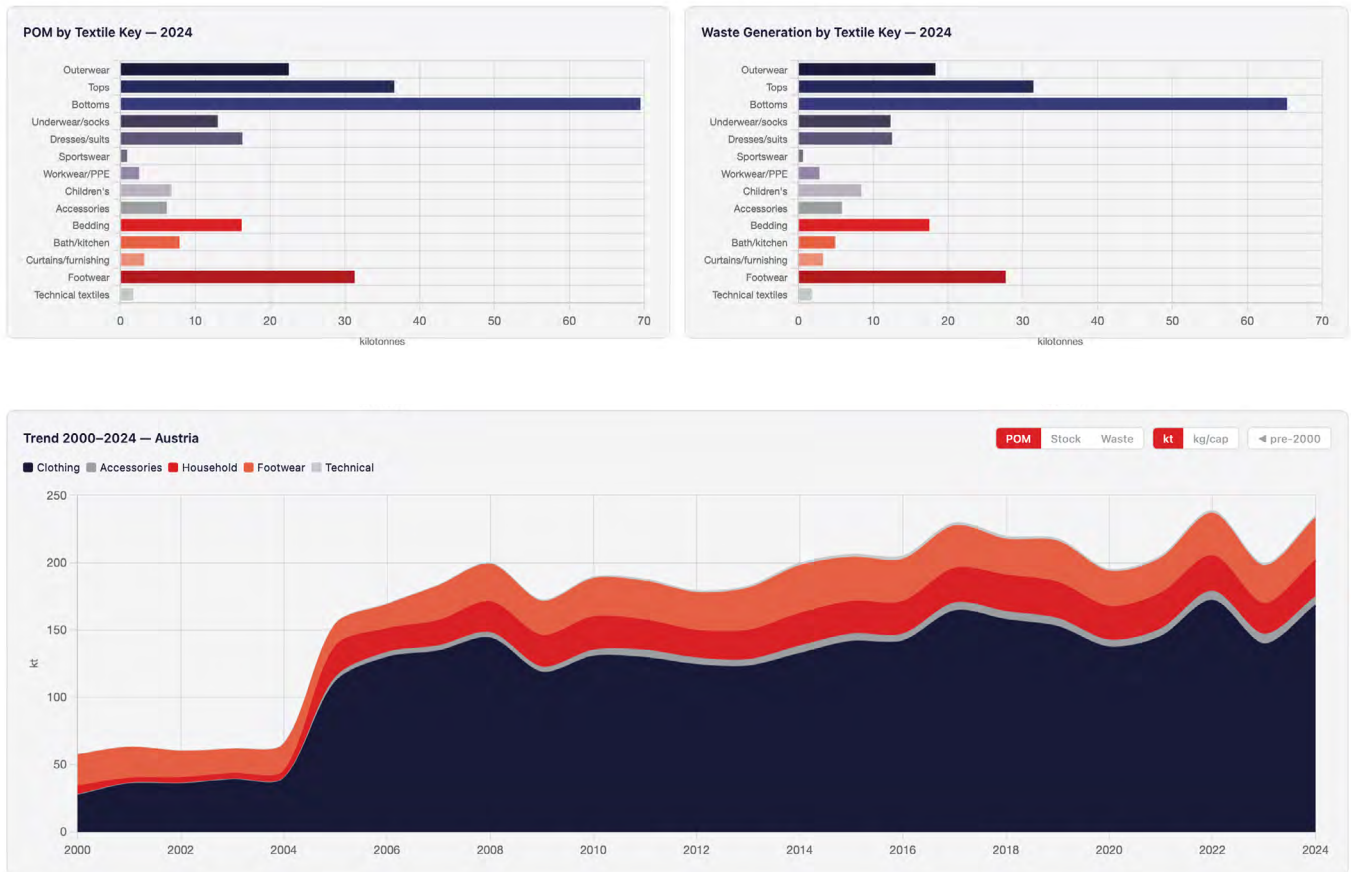


Figure 2: Country Deep Dive of Waste Trends by textile waste category from 2000-2024

The tool provides practical evidence base for decision-making through granular view of total waste volumes, waste per capita, and category composition by country, allowing for improved:

- **Scheme design** by supporting more credible assumptions for how national EPR systems should be structured.
- **Target-setting** by helping calibrate collection targets against likely waste volumes and composition.
- **Infrastructure planning** by providing a better basis for planning collection, sorting, reuse, and recycling capacity.

For producers, the tool can help inform cost forecasting and market prioritisation proportionate to the scale of waste in each markets, and can support engagement with PROs as national systems take shape.

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Key remaining gaps and challenges

Collection, sorting and recycling capacity

The main constraint on the success of Textiles EPR legislation improving circularity in the sector is the lack of physical and commercial infrastructure needed to collect, sort, and recycle textiles at scale. The EU generated approximately 12.6 million tonnes of textile waste in 2019, of which only about one-fifth was separately collected for reuse or recycling. From January 2025, all EU Member States are required to have separate textile waste collection systems in place - yet the infrastructure to process this new flow is far from ready. The EEA has stressed that sorting and recycling capacity need to be urgently scaled up to avoid separately collected textiles being incinerated, landfilled or exported instead of kept in higher-value circular loops.

This means EPR will not automatically translate into strong circularity outcomes in the short term. Producers should expect a period in which system costs rise before downstream capabilities mature.

Fragmented National Implementation

Although the direction of travel is EU-wide, implementation will still happen through national systems. Producers should expect differences in registration processes, reporting formats, fee methodologies, enforcement, and PRO structures — especially for distance sellers, marketplace sellers, and businesses serving several countries from one hub.

Lessons from other sectors with longstanding EPR, such as WEEE and batteries, show the challenges that come from lack of harmonisation. The practical lesson for textile producers is that national divergence should be assumed and managed early, not treated as an exception.

We have observed similar challenges across more mature EPR sectors including WEEE, packaging and batteries. dss* has supported multinational companies in navigating producer obligations across multiple EU jurisdictions, including determining producer status, establishing placed-on-market reporting by country, coordinating authorised representative requirements and managing multiple PRO relationships.

Many of the operational challenges textile producers will face over the coming years closely resemble those already encountered in these established EPR systems. Organisations that begin preparing early are typically better positioned to manage complexity, reduce implementation costs and maintain a harmonised compliance approach across markets.

Weak data, definitions and reporting comparability

The EEA has called for harmonised definitions and mandatory reporting on used and waste textiles, noting that current data are affected by differing interpretations of what counts as used textiles, waste textiles, and reuse-ready products. For producers, inconsistent definitions and reporting rules would make it harder to compare performance across countries, anticipate fee exposure, and defend circularity claims consistently.

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What board members need to know

The opportunity for businesses

While non-compliance with EPR requirements brings risks of penalties, loss of market access, and reputational damage, companies should also view EPR as a potential opportunity to build capabilities that will matter beyond compliance itself.

Companies that engage early with PROs and national implementation discussions will be better placed to understand fee structures, reporting expectations, and service models before those become fixed. Over time, stronger engagement may also improve visibility into future secondary material streams, emerging recycling partnerships, and the likely commercial implications of eco-modulated fees.

We have observed that organisations that engage early with regulators, industry associations and PROs are often better positioned to influence emerging fee methodologies, governance structures and reporting requirements before they become fixed.

dss+ has directly supported PRO development and EPR system operationalisation in multiple markets. For example, in Rwanda, dss+ helped establish the foundations of a national e-waste management system through stakeholder engagement, governance development and producer participation strategies. In Kenya, dss+ supported the development of an industry-led PRO model, including governance design, business planning and stakeholder alignment.

For producers that prepare early, EPR can become a source of better data, earlier market insight, and stronger positioning as the circular textiles system matures.

Strategic Priorities for 2026–2027

Producers do not need to wait for every national detail to be finalised before acting. Companies impacted should already be taking the following steps:

- **Confirm product scope and producer status** by market.
- **Build placed-on-market data** by country and by weight.
- **Assess likely fee exposure and internal implementation costs.**
- **Create cross-functional ownership** across legal, finance, operations, sustainability, retail and data teams.
- **Monitor national legislation** closely and likely PRO models in priority markets.
- **Develop a scalable governance model capable** of managing multiple national EPR schemes while maintaining a harmonised approach across Europe.
- **Begin engaging with emerging PRO structures and industry working groups** to understand future operational requirements and influence scheme development where possible.

What we have learned from other EPR systems

Experience from WEEE, batteries and packaging EPR suggests that the most significant implementation challenges are rarely regulatory in nature. More commonly, organisations struggle with fragmented product data, unclear ownership of compliance responsibilities, inconsistent reporting processes and insufficient coordination across business functions.

Successful implementation requires EPR to be embedded into core business functions including finance, supply chain, sustainability, retail operations and data governance.

dss+ has supported multinational organisations in addressing these challenges across multiple waste streams and jurisdictions. In one recent programme, dss+ supported a leading international technology company in monitoring EPR developments across more than 70 countries, coordinating internal and external stakeholders, managing compliance projects and assessing compliance status across 20 countries and approximately 50 EPR schemes.

The lessons learned from these mature EPR sectors are directly applicable to textile producers preparing for the next phase of European circular economy regulation.

Key Risks for the Board

- **Financial exposure** as fees and internal implementation costs begin to accumulate.
- **Market access risk** if registration and reporting obligations are missed.
- **Reputational risk** if the company is seen as unprepared or makes weak circularity claims.
- **Supply chain & operating disruption** where collection or reporting requirements touch retail and logistics.
- **Competitive disadvantage** for companies that react late while peers build better data and stronger scheme engagement.

From Compliance to Competitiveness

In the near term, textile EPR is primarily a readiness and compliance challenge. Over time, however, organisations that approach implementation strategically will be better positioned to manage costs, engage effectively with PROs, influence scheme development and build stronger circularity capabilities.

Based on our experience supporting producers, PROs, governments and industry stakeholders across multiple EPR systems, dss+ believes the organisations that will benefit most from textile EPR are those that treat it not as a standalone compliance requirement, but as an operational transformation programme.

The immediate task is compliance. The longer-term opportunity is building the governance, data, stakeholder and operational capabilities that will underpin competitiveness in an increasingly circular economy.



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About dss⁺

dss⁺ is the operational transformation partner for complex and high-hazard industries. Driven by our purpose, we help organisations achieve breakthroughs in safety, performance and sustainability that build business endurance and ensure long-term success.

We engage deeply within organisations to empower teams to shift mindsets, shape cultures, and establish the capabilities required at every level. We combine technical expertise and operational experience with a people-centred approach and data-driven insight.

Additional information is available at

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