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CIRCULAR TEXTILES

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Call to Action: Include Textile Reuse and Recycling in FTC Recycling Conversation

We applaud the Federal Trade Commission (FTC) for commencing a comprehensive review of the Green Guides which have been a valuable resource for brands, marketers, retailers, and consumers since they were first introduced over 30 years ago. **As you focus on the topic of recycling, we urge you to include textiles reuse and recycling in this discussion.**

Much has changed in technology, consumer awareness, and interest since the Guides were updated in 2012. Recycling has become more prevalent throughout the US, but there is growing confusion about textiles which, among other items, include footwear, apparel and accessories. Unlike most other household recyclables, textiles can be reused, repaired in addition to recycled. But there are questions surrounding what textiles should be reused, repaired or recycled, if they are actually recyclable, and how to recycle them. Addressing these issues are critical and timely.

The US's own Environmental Protection Agency (EPA) estimates that the average American throws away 70 pounds of clothing and other textiles every year. With only an estimated 15% being reused or downcycled, less than 1% of that is actually recycled, and 85% finds its way to landfills where much of it does not degrade.

Recycling clothes at their end of life is a challenge because footwear, accessories and apparel often contain a mix of synthetic and organic fibers, which require different recycling methods. Additionally, there is a confusion around distinguishing between the terms reuse and recycling, as well as how pre- and post- consumer recycling are handled, and how they are marketed. The good news is that consumers, brands, non-profits and states are increasingly concerned and are seeking solutions. Individuals are looking for ways to reuse and then recycle items, after they are past the point of repair; brands are facilitating take-back programs; for profit and non-profit enterprises are collecting and sorting items; and states are considering and adopting various regimes for addressing textile waste. The economic and job opportunity for increased textile recycling in the U.S. is meaningful: a recent study from Global Market Insights projects the textile recycling market valuation to surpass \$8.5 billion by 2033, and thredUP predicts the global resale market will reach \$350 billion by 2027.

However, as these entities work to weave together a comprehensive solution, it is important that the marketing of these approaches be in-line with the FTC's expressed intent of the Green Guides: to "explain how reasonable consumers likely interpret each such claim, describe the basic elements necessary to substantiate it, and present options for qualifying it to avoid deception."

The December 14th 2022 published Notice on soliciting comments on the Green Guides expressly stated a focus on recycling. Many of the comments submitted did provide insights and suggestions on the broad topic of recycling and also weighed-in on textile recycling specifically. We appreciate the FTC is holding a workshop focusing on recycling on May 23rd, but to not include textiles in this conversation with stakeholders and advocates is a missed opportunity. **We encourage the FTC to provide an additional workshop focused on textiles to appropriately acknowledge this pressing reuse and recycling topic.**

It is imperative that textiles be part of your approach to considering recycling. We hope you will focus on textiles in future events. We look forward to a robust debate and discussion amongst all stakeholders – brands, advocacy organizations, scientific and policy experts, and consumers– and we stand ready to work with you in these endeavors.

Sincerely,

American Circular Textiles (ACT) Group Members:

thredUP *

America's Best Cleaners (ABC) * Arrive Recommerce, Inc * Supercircle * Recurate* Debrand * H&M
* Reformation * Sortile

Additional Supporters:

Amendi * American Apparel and Footwear Association (AAFA) * Another Tomorrow * Collective Fashion Justice * Custom Collaborative *Everlane * Fashionphile * Jewelers Vigilance Committee * Mara Hoffman * New Standards Institute * Onward LLC * Scrap NYC * Sustainable Brooklyn * The Fashion Connection * Upwest