



July 31, 2023

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Submitted by: Rachel Kibbe, executive director, The American Circular Textiles Group (ACT)

ACT Public Membership as of July 2023: The RealReal, Rent The Runway, thredUP, America's Best Cleaners, Arrive Recommerce Inc, Debrand, Fashionphile, H&M, Recurate, Reformation, SuperCircle, Thrilling

Dear EPA,

I am writing on behalf of the American Circular Textiles Group (ACT), a coalition of leading organizations dedicated to driving circularity in the US fashion industry. Our founding members include The RealReal, Rent The Runway, thredUP, America's Best Cleaners, Arrive Recommerce Inc, Debrand, Fashionphile, H&M, Recurate, Reformation, SuperCircle and Thrilling. Together, we aim to establish US leadership in textile waste and circular fashion policy, with a strong focus on the waste hierarchy. For more information about our work, please see our recent policy report: [The United States' Opportunity for Circular Fashion](#).

We commend the EPA's efforts to address plastic and other waste in waterways and oceans, and we want to draw your attention to the significant impact of textile waste on environmental health, human well-being, and climate change. Approximately 60%<sup>1</sup> of the material utilized in clothing production consists of plastic, encompassing polyester, acrylic, and nylon textiles. Domestically, our textile waste has grown by 80% since 2000, making it the nation's fastest-growing waste stream. The disposal of over 30 billion pounds of textile waste in landfills and incinerators annually not only burdens taxpayers and private haulers with billions of dollars in costs but also contributes to the dwindling landfill space and ranks as the third-largest methane emitter<sup>2</sup>.

One of the most significant challenges posed by textiles is microfiber pollution, especially from plastic-based textiles like polyester, nylon, and elastane. This pollution poses serious threats to air, water, and food systems, with growing scientific evidence highlighting its neurotoxic, carcinogenic, immune-disrupting, and endocrine-disrupting effects on human health and wildlife. There is evidence that reused garments shed less microfiber emissions than new garments, so reuse can promote mitigating shedding during the care and laundering of our garments, along with the incorporation of filtration devices into washing machines.

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<sup>1</sup> UN Environment Programme:  
<https://www.unep.org/news-and-stories/story/fashions-tiny-hidden-secret>

<sup>2</sup> ACT: United States' Opportunity for Circular Fashion:  
<https://www.americancirculartextiles.com/act-policy-paper>

Another significant challenge with polyester textiles is recycled polyester's relationship to the bottle industry. Plastic bottles are the only scaled feedstock for the production of recycled polyester, which not only diverts bottles from the bottling industry that could be recycled multiple times as bottles, but also drives up the cost of recycled content for both industries. Moreover, polyester-based textiles can not yet be recycled back into new fibers at scale, because the infrastructure is underdeveloped.

Additionally, the fashion industry's greenhouse gas emissions are estimated to account for over 10% of global emissions. It is crucial to implement effective strategies that reduce textile waste and promote circularity to combat climate change and ensure environmental justice for all communities.

In light of these pressing issues, ACT proposes amendments to existing Extended Producer Responsibility (EPR) laws to include reuse and recycling of textiles, or the enactment of separate textile-specific EPR laws aligned with the waste hierarchy. Federal policy could work to harmonize state laws with clear textile collection targets and carve out funds for textile reuse and recycling logistics, infrastructure and innovation, which will bolster efforts in combating plastic waste and promoting a circular economy.

Federal agencies play a critical role in addressing fashion waste at the policy level. We suggest that federal Congressional committees work together to pass bipartisan legislation that provides a unified roadmap for state and local textile reuse and recycling solutions. This approach will ensure consistency and accessibility while avoiding confusion arising from patchwork state and local laws.

In 2023, the first US Textile EPR bill was introduced in California, and similar efforts were observed with the secondhand sales and use tax exemption bills in Maryland and North Dakota. These developments signal the potential emergence of additional state-level textile-specific EPR bills. To ensure the success of these environmentally beneficial initiatives, the EPA should actively support them through funding and infrastructure development.

In addition to EPR, deposit systems have proven successful in encouraging textile collection and funding circular systems. States like Iowa and New York have implemented successful bottle bill programs, which have led to a significant reduction in roadside container litter. Such deposit systems, when adapted to textiles, can incentivize consumers to participate in sustainable practices and support the labor, logistics, sortation, and infrastructure needed for domestic reuse and recycling.

We believe that by incorporating these recommendations into your strategy, we can make significant progress in reducing plastic waste and promoting circular fashion, ultimately contributing to a more sustainable and equitable future.



Thank you for considering our feedback and for your ongoing commitment to safeguarding our environment and public health. We look forward to collaborating with the EPA and other stakeholders to create positive change.

Sincerely,

A handwritten signature in black ink, appearing to read "Rachel Kibbe", is written in a cursive style.

Rachel Kibbe

Executive Director, ACT