



October 2nd, 2023

Docket ID No. FAR-2022-0006

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

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

Dear Biden-Harris Administration,

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. Together, we aim to establish US leadership in textile waste and circular fashion policy, in order to bolster the economy, create jobs, and protect our environment. For more information about our work, please see our recent policy report: [The United States' Opportunity for Circular Fashion](#).

We express our appreciation for the endeavors of the Biden-Harris Administration in promoting the acquisition of sustainable goods and services. This includes the commendable evaluation of labels and standards by the EPA, as well as the extension of Federal Purchasing Recommendations to cover sustainable uniforms and clothing.

As the administration pursues these initiatives, we would like to underscore the urgent need to prioritize textile circularity as you contemplate sustainable clothing and uniform procurement, and to explicitly contemplate textiles in the Sustainable Products and Services procurement rule.

U.S. textile waste has grown 80% since 2004 and is our nation's fastest growing waste stream. With that growing number, U.S. taxpayers and private haulers pay billions of dollars to send over 30 billion pounds of textile waste to our landfills and incinerators annually. This waste contributes heavily to increased methane production, a greenhouse gas that is responsible for about 25% of global warming.

Textile circularity, or the collection, reuse (including repair and rental) and recycling of clothing and uniforms can reduce these intimidating statistics, aligns with your existing strategy and efforts, and falls under your proposed rules for pollution prevention, environmental management systems, waste reduction, eco-labeling, GHG emissions, use of recovered materials, and more.

This strategy is within the bounds of existing Federal efforts. The Federal Pollution Prevention Act of 1990 laid out a comprehensive structure to engage industry, government, and the public in efforts to reduce pollution through actions undertaken by federal agencies. Taking a significant step, the Biden Administration, in August 2022, delineated a roadmap for implementing this act through an Executive Order (known as the Implementing Instructions for EO 14057). This order

acknowledges the significance of clothing as a material and outlines targets for federal agencies to collect clothing, emphasizing textile source reduction, reuse, and recycling.

As the world's largest buyer, agencies that promote textile circularity, through policy and procurement alike, can make considerable sustainability strides, while also promoting U.S. job creation and economic development. Circularity principals include localized manufacturing. With the U.S. leading the way in environmental standards, domestic onshoring of the manufacturing of federally procured uniforms and clothing also creates a path to more environmentally sound and strong domestic supply chains.

We are confident that by integrating textiles into your strategy for sustainable procurement, the U.S. can lead by example, and we can achieve substantial advancements in the reduction of plastic waste and the advancement of circular fashion. This, in turn, will play a pivotal role in fostering a more sustainable and just future.

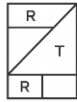
We appreciate your consideration of our input and your dedication to preserving our environment and public well-being. We welcome the opportunity to partner with the Biden-Harris Administration, the EPA, and other relevant stakeholders, in our shared goals.

Sincerely,

A handwritten signature in black ink, appearing to read "Rachel Kibbe". The signature is fluid and cursive, with a large initial "R" and "K".

Rachel Kibbe  
Executive Director, ACT

TheRealReal



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