



Amendment to the Waste Framework Directive (WFD)

Introduction of extended producer responsibility for textiles

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The amendment to the WFD of October 16, 2025 introduces extended producer responsibility, which imposes the costs of collecting, sorting, re-using, and recycling old textiles and textile waste on manufacturers, importers, and distributors of certain textiles in particular.



Key novelty: Extended producer responsibility

What is extended producer responsibility?

- The amendment obliges EU member states to introduce a system that requires textile manufacturers to bear the costs of collecting, sorting, reusing, preparing for reuse, and recycling textile waste (known as extended producer responsibility).

What falls under the definition of “waste” according to the WFD?

- Textiles are considered waste when the holder discards them, intends or is requested to discard them (see Art. 3 No. 1 WFD).
- Textiles are not considered waste if they are not discarded but are specifically passed on for reuse, i.e., by being given away, sold, or donated.



Objectives of the amendment

The development of durable, repairable, and recyclable textile products should be promoted, thereby making a significant contribution to the transformation toward a circular textile economy. This goes hand in hand with extended producer responsibility:

- Investment in separate collection, sorting, reuse, and recycling of textile waste
- Promotion of research and development of innovative sorting and recycling technologies and processes
- Tougher measures against illegal exports of textile waste



Implementation deadline

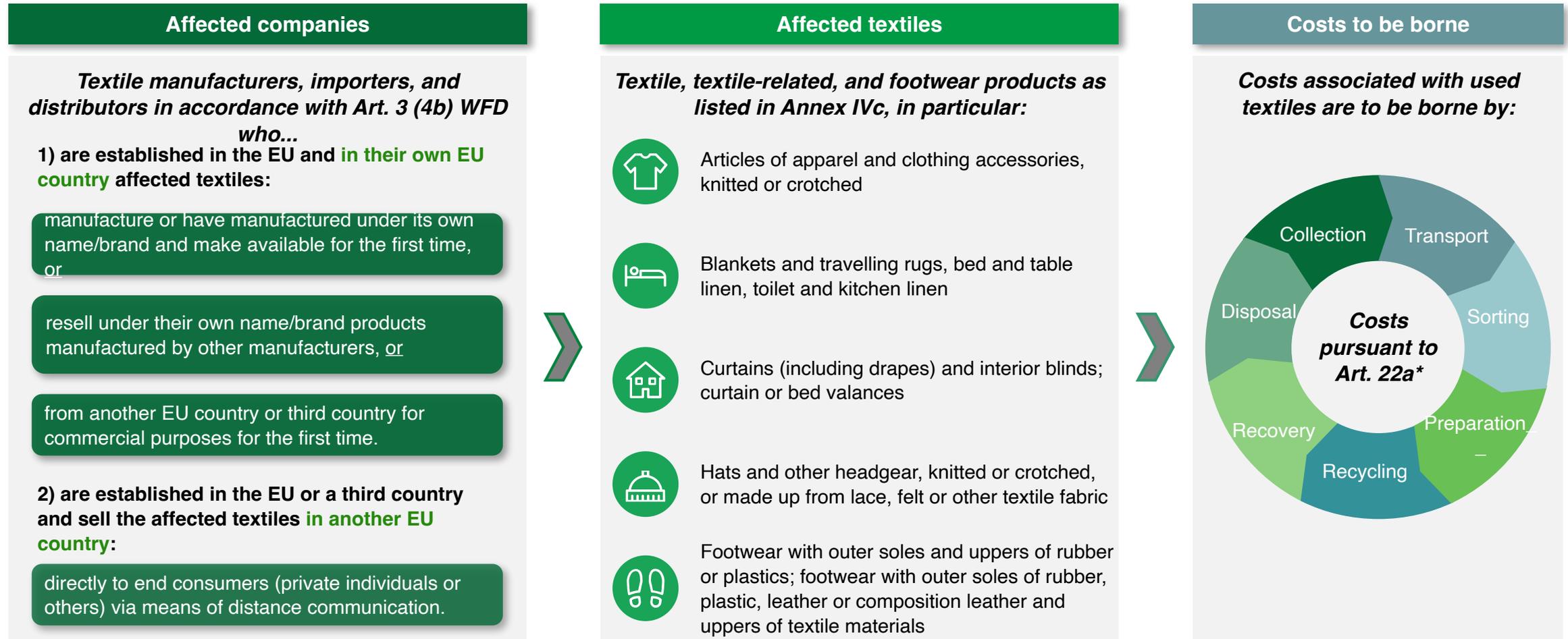
October 16, 2025
Entry into force of the
WFD amendment

By June 2027
Directive to be
implemented by
member states
(without extended
producer responsibility)

By April 2028
Implementing extended
producer responsibility
in member states



Below, we provide a concise overview of the personal and material scope of application of the regulation, as well as the costs to be borne within the framework of extended producer responsibility.



* This also includes costs for textile waste at collection points and for information campaigns on sustainable consumption and waste prevention. In addition, there is a contribution to the costs of official data collection and reporting, as well as to the support of research and development to improve sorting and recycling processes.

03 | Further innovations and the situation in Germany

In addition to extended producer responsibility, a key component of the amendment is the introduction of a producer register. Furthermore, from July 2026, a ban on the destruction of unsold textiles will come into force in accordance with the Ecodesign for Sustainable Products Regulation (ESPR) for certain textile products.



Introduction of a producer register

- Each EU Member State must introduce its own producer register (Art. 22b). Before a product is made available for the first time in an EU country, it must be registered in the producer register of the respective country
- Registration requires the following information: name, trade/brand name, contact details, trade register number, national tax identification number, CN codes of the textile products, and details of the producer responsibility organization
- Registration by the producer itself or an authorized organization



Ban on the destruction of unsold products

- For unsold clothing, clothing accessories, and footwear (consumer products), a destruction ban will apply from July 19, 2026, based on the ESPR
- Prohibition on the destruction of unsold consumer products in accordance with Annex VII of the ESPR (Art. 25 (1) subparagraph 1 ESPR), including clothing and clothing accessories made of (artificial) leather, knitted or crocheted fabrics, hats and other headwear, and footwear
- Micro and small enterprises are exempt for the time being; for medium-sized enterprises, the ban will only apply from July 19, 2030 (Art. 25 (1) subparas. 2, 3 ESPR)



Situation in Germany

- To date, there is no extended producer responsibility for textiles in the German legal system. It is currently unclear how exactly this will be implemented.
- One possibility would be to implement it into national law by amending the Circular Economy Act (KrWG). However, it would be preferable to create a kind of “textile law.”
- This would be in line with the current legislative approach, in which specific product groups are regulated by separate laws, see the Battery Act (BattG), the Electrical and Electronic Equipment Act (ElektroG), or the Packaging Act (VerpackG).

04 | Your contacts

If you have any questions, please feel free to contact us at any time!

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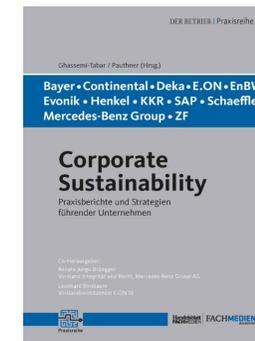
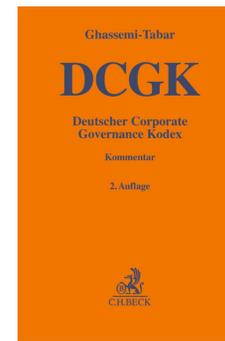
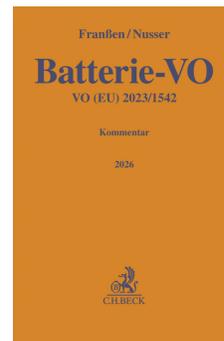


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