Written evidence submitted by Chris Carey’s Collections Ltd

Chris Carey’s Collections Ltd are a London based Textile Recycling Company collecting, sorting and processing in excess of 9500 tonnes of unwanted textiles per year. Our responses are as follows:

Environmental impact of the fashion industry

Have UK clothing purchasing habits changed in recent years?
CCCL have noticed that the volumes of clothing waste have increased year on year. A considerable increase in the volumes of low grade, fast fashion clothing are processed in our sorting plants. In addition, the volume of slow fashion garments has considerably decreased. Even geographically wealthy wards throughout London and the home counties, with affluent levels of wealth; have seen a disproportionate increase in the volume of fast fashion disposal compared to that of 5 years ago.

The increase in disposal of clothing due to a minor repair or alterations being required is considerable. This connects to the low-grade quality and inexpensive price of the fast fashion industry as zips are not robust, seams are not as well finished, and buttons are not secure added to a throwaway society which no longer has the skills to make do and mend.

What is the environmental impact of the fashion supply chain? How has this changed over time?

The increase in the popularity of fast fashion directly impacts on volume of textile waste within the textile recycling industry. The industry has historically, predominantly, sent suitable clothing into reuse markets. As the material quality diminishes this option becomes less viable with considerably more material going to Energy from Waste than would have previously been acceptable. A decline in remanufactures of the material not suitable for reuse means that there is little other option currently.

The increased production of low grade clothing uses low grade man made fibres as the pressures to keep the costs down means that more environmental corners are cut and with textile dye being the second largest polluter of clean water we need to consider the increased volumes being produced.

What incentives have led to the rise of “fast fashion” in the UK and what incentives could be put in place to make fashion more sustainable?

Price is the key to the rise in popularity of fast fashion. CCCL believe that owners of fast fashion brands should be responsible for financing solutions to the recycling of these garments. The brands should also support recyclers to develop closed loop solutions to enable these materials to go back to the manufacturers for reuse.

The UK could look at case studies from other European cities to reflect on what could work as best practice within the UK, introducing extended producer responsibility to clothing brands.
Second is a continual supply of new and fresh designs which are often just cheap copies of a slow fashion brands high end design. Investigate the feasibility of responsibility for the tonnage of apparel flooding the market and its life expectancy. Fast fashion retailers have considerably lower life expectancy of garments, again, responsibility for the recycling of this material should be the responsibility of the brand. Potentially a carbon emission levy should be introduced to the manufacturers and consumers who are supporting the production of less environmentally friendly garments.

Is “fast fashion” unsustainable?

CCCL believe so, lower cost clothing for mass consumption is not produced to last a long period of time. It therefore makes the material unsuitable for reuse. The environmental impact of manufacturing these garments far outweighs their lifespan. The disposal of this clothing is having yet further implications on the environment as the majority is being sent to landfill.

What industry initiatives exist to minimise the environmental impact of the fashion industry?

CCCL believe that there are several inadequate initiatives within the industry. However, many of these schemes are being outsourced for processing to textile recyclers for a revenue. The material is being sent predominantly for reuse if suitable quality after processing by the recycler. With reuse being the only real, current and financially viable means of recycling clothing, this is not the message we should be promoting. The issue with these schemes are; that they support a high volume, low quality culture and almost justifies the throw away culture that the environment is unable to sustain. The textile recyclers can’t continue to absorb the cost of processing this increasing tonnage of poor quality material.

Textile Recycling Technology needs to be financially supported so it can advance, and this technology needs to be introduced alongside the textile recyclers who are processing this low grade material constantly. UK textile recyclers are not supported financially; they are financially strapped commercial entities that are struggling to exist as such are rapidly closing. It is essential that these businesses are supported and developed.

How could the carbon emissions and water demand from the fashion industry be reduced?

Investigation into introducing extended producer responsibility within the UK – investigate European case studies.

Introduce an item / tonnage limit to the fast fashion industry to prevent flooding the market with low grade clothing. Or consider limiting the collection numbers and volumes per year.

Introduce stronger measures to protect the intellectual property of the slow fashion industry so that designs cannot be copied so easily.
Make recommendations to the industry that the use of sustainable natural fibres, rather than man made alternatives would be supported particularly in the manufacture of priority garments.

Investigate how the UK could impose a duty onto the consumer to promote responsible procurement of fashion.

**Waste from fashion**

**What typically happens to unwanted and unwearable clothing in the UK? How can this clothing be managed in a more environmentally friendly way?**

I am of the opinion that all textile waste should be distributed to an approved textile recycler within the UK for processing. Domestic textile sorters, graders and processors within the UK are experts in this field. Most are established businesses who have been processing for a number of generations.

Unwanted good quality clothing should be passed onto textile recyclers to process for reuse markets. Unwearable and damaged clothing with no reuse markets available should be diverted into Energy from Waste until a financially viable solution for fibre to fibre recycling has been established.

Global reuse markets should be encouraged and supported by government as should domestic reuse markets (as a primary concern). As per the hierarchy of waste, reuse is only secondary to reduce. As there is not really a viable recycling industry for textiles (as yet), it is imperative that the UK advances in this area. This would create industry and jobs.

Textile waste should not go for disposal to landfill, RDF or EfW are more suitable temporary solutions. A ban should be considered on textile waste going into landfill when it can go for recovery.

**How much unwanted clothing is landfilled or incinerated in the UK each year?**

It is thought that over 300,000 tonnes of textiles are deposited into landfill annually.

Men are more likely to send clothes to landfill, with 82% saying they would just dispose of old clothing in the rubbish whereas only 69% of woman would dispose old clothing in refuse.

**Does labelling inform consumers about how to donate or recycle clothing to minimise environmental impact, including what to do with damaged clothing?**

Sometimes, but not very often and certainly not enough. Some clothing retailers have recycling schemes available, these schemes are often not promoted as well as they could be.

**What actions have been taken by the fashion industry, the Government and local authorities to increase reuse and recycling of clothing?**

The Local Authorities and Waste Management companies have, historically been satisfactory at supplying textile recycling banks in HWRC’s and bring sites to encourage
the public to recycle their clothing. For a considerable number of years, they have working in support of textile recycling companies to ensure as much textile waste as possible is diverted from Landfill.

The fashion industry has started to work with charity partners ultimately does not solve the recycling issue. The charitable sector does not consider this material ultimately, as waste. The textile recycling industry are encouraged to pay charities for the material they have had donated and no longer want or can’t sell. This material is sold onto textile recyclers for recycling. Ultimately this material is waste, should be supplied to fully auditable textile recyclers who can sort and process this material to ensure that ultimately, waste is not being exported outside of the UK so that the charitable sector can fulfil their waste legislation duty of care.

The charitable sector often commands elevated rates for their unsold, donated waste textiles and ensures that the textile recycling industry compete for this material. This may have contributed to a considerable number of UK textile graders, sorters and processors ceasing to trade as they are unable to make it work financially. The charitable sector often prefers to use textile collectors, rather than graders as these commercial businesses do not have the overheads that a sorter / recycler has and can offer the charities a higher price per tonne. Whilst this helps revenue streams for the charitable sector the government should enforce the same duty of care to that of the waste industry within the charitable sector.

Perhaps the fashion industry believe that the support of the chartable sector is solving the problem, when, more often than not it is actually exacerbating the problem further as these textiles are then being sold onto a textile collector who then sells the material onto a textile recycler at an inflated rate. This, along with the higher quantities and lower quality of material are bringing many recyclers to the brink of closure. The textile recycler needs the quality material in their grade to ensure the material can be sold on for reuse. Without this grade the reuse market will, in time collapse and therefore without a textile recycling market, this would be disastrous.

UK based Textile Recyclers (sorting and processing) are also having to compete with collectors who simply export textile waste directly outside the UK without undergoing a sorting process.

**How could consumers be encouraged to buy fewer clothes, reuse clothes and think about how best to dispose of clothes when they are no longer wanted?**

Through education and advertising, if consumers saw the volumes of textile waste consumers would be horrified. The industry needs a complete change of attitude.

**Sustainable Garment Manufacturing in the UK**

**How has the domestic clothing manufacturing industry changed over time? How is it set to develop in the future?**

Manufacturing is not actively supported in the UK, the costs of running a business are to high. The majority of manufacturing is outsourced overseas. Domestic clothing
manufacturing should be introduced, and there should be a levy imposed on low grade clothing that recyclers are struggling to process.

**How are Government and trade envoys ensuring they meet their commitments under SDG 8 to “protect workers’ rights” and “ensure safe working environments” within the garment manufacturing industry? What more could they do? Are there any industry standards or certifications in place to guarantee sustainable manufacturing of clothing to consumers?**

The entire chain needs to be investigated further as there are serious concerns from the manufacture of clothing in the developing world to the collection, sorting and processing of textile waste both in the UK and overseas. The Textile Recycling Association provides an Industry standard for the Textile Recycling Industry to which we adhere.

Please accept my apologies if this is submission is not entirely succinct. I have had little time to prepare it as work commitments have been considerable over the summer period due to increased tonnages for recycling. I would however like to offer my support to this inquiry as it is something I feel very passionately about and believe that change needs to be implemented urgently. Please feel free to contact me further should you wish to discuss any of my points further.

*February 2019*