

BHF Submission to the Circular Economy Taskforce

A circular economy for textiles

August 2025

About British Heart Foundation

BHF is the UK's leading charity retailer, with over 700 shops and stores across the four UK nations. The income from our retail estate helps us power over £100 million of lifesaving research each year in support of our vision of a world where everyone has a healthier heart for longer.

Charity retail provides a number of societal benefits. Charity shops and stores have a unique place on high streets in the UK, providing several key benefits within local communities, including 23,500 FTE jobs, and over 203,600 volunteering opportunities, while raising more than £75.3 billion for their respective charitable causes.ⁱ Charity shops also play an important role in the reuse economy. This year, we anticipate that we will sell around 25 million donated items through our retail network, helping reduce the volume of waste that ends up in landfill.ⁱⁱ

In particular, we receive thousands of tonnes of second-hand clothes each year from members of the public. We divert 11,000 tonnes of textiles a year to reuse and recycling and hence have a strong interest in the development of policies to support create of a circular economy for textiles.ⁱⁱⁱ We also hold partnerships with retailers such as Charles Tyrwhitt, Amazon, Claire's Accessories, Boohoo Group and 69b, who donate customer preloved, customer returns and end-of-line stock for sale in our shops, helping to manage a different stream of potential textile waste.

BHF welcomes the opportunity to contribute to the Circular Economy Taskforce's thinking on textiles and were pleased to attend the Circular Economy Textiles Stakeholder Workshop in May. We agree with the Ellen MacArthur Foundation's assertion that a 'comprehensive circular economy approach is the only solution that can match the scale of the global textile waste problem'.^{iv} However, it is important that the role of charity retailers is understood and supported as the Taskforce seeks solutions for the UK's textile waste.

Considerations to support charity retailers' role in the circular economy for textiles

British Heart Foundation, like most charity retailers, receives clothes that can be reused and resold, and clothes that cannot because they are too worn or of poor quality. Charity retailers' ability to manage both elements responsibly whilst raising funds to further their core charitable aims needs to be considered as part of the Taskforce's work.

In particular, charity retailers must be involved in the development of any Extended Producer Responsibility (EPR) programme, textile take-back schemes and policies to prevent the destruction of useable clothing by classing it as waste and to ensure responsible management of used textiles including exports as the Government considers the Circular Economy Taskforce's recommendations in this area.

1. Supporting reuse and sale of used textiles collected via through EPR or takeback schemes

BHF would support the introduction of an EPR scheme, in principle. However, should such a scheme be introduced, it should be mandatory in order that the entire sector is incentivised to contribute to the solution. Moreover, reuse must be established as one of the aims of such a scheme, rather than an addition and the role of charity actors must be clearly defined in any EPR strategy. A number of EPR schemes are now in place or under development in European countries, many of which have considered preparation of textiles for reuse.^v France, which has the most developed scheme, has set a target that 15% of collected textiles will be reused within 1500km of collection by 2027, but also acknowledge the need to stimulate a reuse economy within France.^{vi} This must include a communications strategy, appropriate incentives for all actors in the system and adequate capacity to collect, sort and manage the volume of textiles that might be anticipated to move through the system.

Similar considerations need to be in place for takeback schemes, which may be part of an EPR programme, or stand alone. Examples of these have been operating in the UK for many years, with brands such as M&S, TK Maxx, Primark and others collecting used textiles for recycling or resale, often by UK-based charity retailers.

Expansion of such schemes, including via a possible mandate for retailers, could support consumers to conveniently choose a route to reuse / recycling, and could better incentivise clothing retailers to donate both unsold and taken-back stock to charity retailers. However, the detail of how such a system would work will be important to ensure that donations that are of appropriate quality for reuse are not diverted straight to recyclers, and that it is economically viable for both manufacturers to donate to and for charity retailers to access take-back collected stock. This includes the financing of adequate collection infrastructure and support for charities to manage unsaleable stock received through these routes. Additional considerations are needed for destruction bans. Incorporating a destruction ban into an EPR scheme could incentivise retailers to collaborate and send clothes to charity retail, adding social value. Wales already has an effective ban on destruction of unsold textiles where all concerned workplaces in Wales must separate unsold textiles for recycling or donations. These cannot be sent to landfill or incineration except where there is no feasible market for re-use or recycling.^{vii}

2. Infrastructure and accountability

Investment and adequate infrastructure will be critical to support better collection, grading, sorting, resale and recycling of textiles. This is especially true to enable charity retailers to play their full role in the circular economy. WRAP estimates that almost half of all used textiles – 49%, 711,000 tonnes - end up in household waste each year.^{viii} The volume of textiles needing to be managed in any circularity programme is therefore enormous, and the potential burden on charity retailers needing to sort and manage low-quality or damaged textiles that are not suitable for resale requires careful thought and support, including appropriate access to recycling routes and cost recovery for handling non wearable textiles.

It will also be vital to ensure that any organisations involved in the re-use and recycling of textiles derived from EPR or take-back schemes are appropriately regulated and certified, to ensure that they are adhering to safe and legal practices, including modern slavery policies.

Currently, the majority of retail charities avoid irresponsible or illegal actors in this by ensuring that all partner merchants involved in the textile supply chain are TRUST certified.^{ix} This means that:

- Traders are subject to an independent audit every two years
- Traders have to demonstrate competencies relating to health and safety
- Traders have to provide information on their processes and end destinations
- Traders have to have appropriate waste exemptions and licences in place.

However, due to the lack of graders within the UK full transparency over the processing of textiles is only partially available, although there is dialogue with overseas graders and other quality standards around extending audit scope.

Additional challenges exist around the data that is available to enable understanding of the increase in volumes of textiles in the reuse and recycling system that may result from these policies, and in the current lack of clarity around appropriate re-use. Whilst legislation exists around waste, this is not true of reuse of textiles. Clear guidance will be needed to specify what is acceptable re-use and what is acceptable recycling, drawing on established best practice, as well as a minimum standard which needs to be built on TRUST's existing standard.^x There is also a need for transparency which would expose EPR funded textile processes to public scrutiny and would deter both inappropriate destruction and poorly managed reuse.

3. Export of used textiles

The UK has one of the highest rates of collection for clothing in the world. Vintage clothing shops and eCommerce platforms are growing rapidly. However, it is estimated that 65% of the clothes collected are exported to global markets.^{xi}

It is therefore vital that the Taskforce considers how textiles that are exported overseas can be managed and how end-destination countries can best be integrated within policies to manage the UK's used textiles. Globally re-use demand is concentrated in low-middle income countries where there is higher risk of insufficient waste collection infrastructure and unsafe disposal. This makes it even more important that EPR for textiles crosses borders and takes into account the views of trade associations, government bodies and waste and recycling professionals based near the final point of discard. There is demand from the UK public and from stakeholders in Ghana, Kenya and other key destinations to address this risk, not just for waste arising in or near markets, but for all textiles. There has already been some progress in increasing capture of textiles near markets and both Ghana and Kenya have their own textile EPR systems in development which should be considered in the design of UK textiles EPR.^{xii}

BHF is engaged in dialogues with various stakeholders in Ghana, Kenya and internationally including trader representatives, NGOs and waste professionals around how quality control and research can drive investment in the sector and appropriate policy interventions. BHF is currently building our knowledge on how we can bring greater visibility into the export process and quality assurance of second-hand clothing through our partnership with the Worn Again Project, led by the Jospong Group

in Ghana and Sait Recycling. Through our involvement in this partnership, we hope to support delivery of a tech-driven, scalable, and sustainable solution to concerns about textile waste in Ghana.

Summary

BHF believes that a UK textiles EPR can draw on examples of other EPR systems such as the packaging EPR and textile schemes in other countries. It however needs to recognise the unique position of the charity retail and onward reuse chains to maximise environmental, social and economic value from this important trade and responsibly apply funding and support where it will have most impact. In addition, goods captured for re-use and need to be processed in line with the waste hierarchy in the UK and further destinations. The UK could be a world leader in this respect, as no other country has yet extended producer responsibility for textiles cross border after first use.

BHF is strongly committed to ensuring that our practices are sustainable and responsible and are working to develop our understanding of how we can best support the Taskforce's aim of enabling resource circularity. We look forward to engaging further on this important issue.

For more information on any of the above, please contact Lily Martin, Senior Policy Officer at martinlil@bhf.org.uk

ⁱ Charity Retail Association, [CRA's Workforce report](#), August 2025; Charity Retail Association and Social Value UK, [The Value of Giving Back – The Social Value of Charity Shops' report](#), 2023

ⁱⁱ British Heart Foundation, [Retail - Instore](#), 2025

ⁱⁱⁱ British Heart Foundation, [British Heart Foundation supports Textile Action Week](#), 2021

^{iv} Ellen MacArthur Foundation, [We need Extended Producer Responsibility \(EPR\) policy for textiles](#), 2024

^v WRAP, [Textiles EPR Status Report](#), Asia Garment Hub, January 2024

^{vi} Ellen MacArthur Foundation, [EPR for Textiles in France](#), 2024

^{vii} Welsh Government, [Separated Waste Collections for Workplaces](#), GOV.WALES, 2024

^{viii} WRAP, [Textiles EPR Status Report](#), Asia Garment Hub, January 2024

^{ix} TRUST, [TRUST Certified Standards for Recycling](#), 2024

^x Trader Recycling Universal Standard, [Trust Merchants – Boosting Standards in the Recycling Sector](#), 2024

^{xi} WRAP, [Textiles Market Situation Report](#), 2024

^{xii} Ellen MacArthur Foundation, [EPR for Textiles in Ghana](#), 2024 & Oraro & Company Advocates, [Behind the Seams: The Hidden Environmental Cost of Textile Waste](#), Legal Alert, April 2025