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Circular Economy Materials Management Division,
Department of Climate, Energy and the Environment,
Newtown Road,
Wexford,
Y35 AP90.

7th July 2025

To whom it concerns,

Cork Chamber welcomes the opportunity to provide feedback to the Department of Climate, Energy and the Environment's public consultation on the draft National Policy Statement and Roadmap on Circular Textiles.

Cork Chamber represents 1,200 members together employing 130,000 people throughout the city, metropolitan area and county. Our vision is to lead a transforming and ambitious Cork city and county, and our purpose is to unite, represent and support our members and community. Our direction is guided by our formal pledge to uphold the United Nations Sustainable Development Goals. Cork Chamber has also been designated an SDG Champion by the Department of Climate, Energy and the Environment's for 2024 – 2025.

Cork Chamber's advocacy efforts are guided by the views and priorities of our partners, and are shaped by our continuous engagement with members, our board and key stakeholders in Cork city and county. Sustainability is a key priority for Cork Chamber members, particularly given Cork's participation in the EU Climate-Neutral and Smart Cities Mission to 2030.

Given the ambitious climate targets in place at national and EU level, supporting the pursuit of a more circular economy is a key priority for many in the business community and we welcome the opportunity to contribute to the development of policies that support this aim. Cork Chamber's consultation response is informed by the views of members across a range of sectors with an interest in circular textiles.

Yours sincerely,

Cathal McSweeney

Director of Public and International Affairs



Introduction

Cork Chamber welcomes the overall aim of the draft Policy Statement and Roadmap on Circular Textiles to set a clear policy direction for how Ireland can tap into the potential for a circular economy in textiles. Clear objectives and coherent policy direction will encourage greater alignment between all stakeholders involved in the production, distribution and consumption of textile products, facilitating increased reuse and recycling across the textile value chain as a whole.

Textile products have an important role to play across a variety of sectors, however Ireland's level of textile waste stands at approximately 110,000 tonnes per year at present. Ireland also has the second highest level of textile waste in the EU, according to the European Environment Agency.

Efficient resource management and circular practices in the textile sector can bring about environmental benefits, as well as cost efficiencies for businesses. Implementing more efficient and effective resource management with a focus on reducing excessive production and consumption, promoting reuse and repair, can benefit SMEs and local economies, as well as the Irish economy as a whole.

As noted in the draft Policy Statement, Ireland is a net importer of new textiles. Transitioning to more circular practices regarding textiles in use in the Irish market can therefore play an important role in enhancing Ireland's overall sustainability, both from an environmental and economic point of view. Reducing reliance on textile imports can reduce carbon emissions, while also promoting innovation in reuse and recycling in businesses of all sizes.

Information and Awareness

As part of our commitment to supporting the business community in the pursuit of more sustainable business practices, Cork Chamber coordinates the Sustainable Cork Programme, which aims to explore key themes vital to support a sustainable and resilient Cork, empowered by a thriving business community. Sustainable Cork Programme events provide a platform for the exchange of ideas and shared learnings among businesses and those with expertise in various areas of sustainability.

In June 2025, an event focusing on the circular economy was held as part of the programme, 'Embedding Circularity into Business Models.' Panellists explored how circular practices can be embedded into business models to support long-term, sustainable growth. The event was an EU Green Week 2025 partner event, supporting this year's theme of circular solutions for a competitive EU.³

¹ Environmental Protection Agency, <u>Textiles</u>

² European Environment Agency, Management of used and waste textiles in Europe's circular economy

³ EU Green Week 2025

As noted in the draft Policy Statement, the vast majority of textiles on the Irish market are conventional, virgin textiles, and there does not appear to be a strong pull from Irish consumers to demand more circular business models in the sector. However, awareness of the impact of 'fast fashion' and other non-circular practices is growing among consumers, and informational communications campaigns can play an important role in changing consumer habits, as well as business practices as a result.

It is vital that supports are provided to businesses, both in the form of financial supports where necessary and advice, as consumer practices evolve. Events like the recent Sustainable Cork Programme panel discussion can help play a role in supporting businesses on their circularity journeys. In implementing the Policy Statement and Roadmap, government should engage continuously with businesses active in the sector to ensure sufficient information and advice is available to them. As it can often take time to implement significant changes in the supply chain, it is critical that sufficient timelines are set out to support the transition from linear to circular production.

Repair and Reuse

Alongside informational and educational campaigns, it is vital that both consumers and businesses are supported by enhancing the affordability of circular practices. Costs for many businesses and consumers have increased considerably in recent years and any further increases in this cost burden to improve circularity should be mitigated insofar as possible.

Repair incentives for consumers can help to encourage reuse and recycling. In France, a 'repair bonus' is in operation, allowing consumers to access discounts for the professional repair of clothing and shoes.⁴ Similar incentives should be considered in Ireland to support consumers to make conscious, sustainable choices rather than relying on fast fashion.

In addition, schemes that support the availability of materials for repair should be considered, such as the possibility of borrowing textile repair kits from local libraries, for example. In Cork, FASH Forward currently offers clothing repair kits for Munster Technological University students and staff which can be borrowed through the university library. Further education around skills of basic repair for consumers, through workshops for example, could also be considered in this regard.

Ensuring the availability of textile recycling infrastructure, both for consumers and businesses, in Ireland is also important. According to the European Environment Agency, the proportion of textile waste ending up in municipal waste in Ireland is much higher than in other EU countries. Investing in infrastructure, such as textile banks, industrial-scale textile recycling facilities, and other infrastructure to support repair and reuse by consumers should be prioritised. The draft Policy Statement notes that there are a number of options currently

⁴ Repair Bonus: financial assistance to patch your clothes and shoes

⁵ MTU, <u>Fashion Repair Kit</u>

⁶ European Environment Agency, Management of used and waste textiles in Europe's circular economy

available for the collection of textiles in order to maximise opportunities for reuse. Such schemes should be further expanded and supported by the new strategy.

The upcoming Extended Producer Responsibility (EPR) scheme for textiles will be important in this regard. The scheme can help drive innovation in the sector and support sustainable design. Considering the EPR in the context of other policy frameworks and systems currently in place will be vital, and supporting those involved in the supply chain throughout implementation will also be critical to ensure the scheme's successful introduction.

Retail and Consumer Support

In addition, ensuring a level playing field between businesses operating in Ireland and the EU, particularly indigenous SMEs, and those based in third countries is vital. Some retailers report inequalities in the enforcement of sustainability regulations when it comes to goods produced by e-commerce outlets outside the EU. Large online retailers in third countries continue to produce low-cost garments that are then imported into the EU, potentially undermining the advances made in circularity by retailers within the bloc. Enhanced customs checks for goods entering the EU could help to mitigate the impact of such imports, and the implementation of environmental criteria in customs checks is critical.

Collaborations and partnerships across the value chain can help to bring about impactful change when it comes to circularity and should be encouraged by the Department. Such initiatives would promote knowledge-sharing and would also allow for the collection of important data on the scale of fast fashion and textile recycling in Ireland. In the UK, there are examples of garment repair firms partnering with major retailers to offer consumers access to repair services. Similar partnerships with major retailers in Ireland could be explored to provide consumers with accessible repair options supported by Government. The draft Policy Statement's commitment to exploring policy measures to support reuse and repair in the forthcoming Second Circular Economy Strategy is welcome in this regard.

Conclusion

In conclusion, Cork Chamber welcomes the Department's commitment to pursuing a whole-of-government approach to circularity to support the aims of the draft Policy Statement and Roadmap. Continued collaboration with key stakeholders like Cork Chamber's Sustainable Cork Programme and through fora like the Textiles Advisory Group will be critical in this regard, as well as ongoing engagement with businesses active in the textile supply chain and supports for consumers in the transition to more sustainable practices.

⁷ M&S launches clothing repair service to give quality clothes 'another life' through plan A