

30 March, 2026

ReHubs submission for the Joint Research Centre 3rd milestone: Preparatory study on textiles for product policy instruments.

The Joint Research Centre (JRC) Preparatory Study (3rd Milestone) on textiles under the Ecodesign for Sustainable Products Regulation marks a critical step toward shaping Europe's circular textile future.

Following the close of the public stakeholder consultations on March 30th, ReHubs has contributed on behalf of its cross-value chain community, bringing together real operational insights from collection/sorting, pre-treatment to recycling, yarn spinning, fabric manufacturing, and brands.

ReHubs' messages are clear:

Keep the focus on textile-to-textile recycling

True circularity requires prioritising fibres from textile waste, not diverting materials from other sectors like packaging. This is essential to address Europe's growing post-consumer textile waste challenge.

Design is the starting point, but not the full solution

Ecodesign is a critical enabler to improve recyclability and feedstock quality. But without parallel investment in collection, sorting and pre-treatment infrastructure, its impact will remain limited.

Adopt a technology-neutral approach

Mechanical, thermo-mechanical and chemical recycling are complementary. Policy must support all pathways and avoid bias that could limit innovation or scale.

Design for recyclability is the starting point

Recyclability remains indispensable as it standardizes the data architecture needed for feedstock qualification, sends early signals to design teams, and creates the pre-conditions for traceable textile-to-textile loops. Recyclability serves as a technical prerequisite for recycled content, ensuring that recyclability efforts translate into tangible circular economy outcomes.

ReHubs supports mandatory recycled content

Mandatory recycled content requirements are needed to create real market demand and drive investment. The requirements must integrate both information (disclosure of recycled content) and performance (minimum recycled-content thresholds).

Align incentives through EPR and robust scoring

Eco-modulated fees can drive better design, but only if based on a realistic, operational recyclability framework reflecting real-world processes.

Seize the moment to advance textiles circularity

ReHubs mission is to recycle 2.5 million tons of European textile waste annually by 2032. This needs the support of the right regulatory signals and market conditions.



ReHubs stands ready to support the European Commission with data-driven insights and on-the-ground expertise. **It is essential that policymakers seize this moment** to enable a truly circular, competitive, and resilient textile ecosystem in Europe.

Thank you to our valued Partners for your contributions and continued support of ReHubs, as we work together to advance textile circularity.