Bureau of International Recycling

June 2026

BIR Comments on the Regulation of Used Textiles under the Basel Convention

Background

BIR, the Bureau of International Recycling, is the world federation supporting the interests of the recycling industry since 1948. As the largest international recycling federation, BIR represents over 30,000 companies across 73 countries, through 36 national associations and over 1,100 direct corporate members, covering eight material streams including ferrous and non-ferrous metals, paper, textiles, plastics, tyres and rubber, and electronics.

BIR's mission is to promote materials recycling, free and fair trade of recyclables, the environmentally sound management of resources, and the use of recycled materials worldwide.

Summary:

BIR brings extensive practical experience in the collection, sorting, trade, and recycling of textiles. Our members depict a highly global value chain that efficiently reintroduces post-consumer and post-industrial textiles into the economy, preventing waste and saving resources. At the same time, the lack of clear, harmonised waste definitions and adequate trade codes poses significant challenges to the reuse and recycling industry.

These comments set out **the industry's experience of how different used textile flows work in practice** and provide recommendations **on how to address environmental concerns associated with these flows**, while preserving the circular systems that already contribute to their prevention.

I. A globally integrated and specialised value chain

Used textiles fall into three distinct flows, each serving a different function in the circular economy:

- **Unsorted used textiles:** post-consumer textiles, footwear, and accessories collected and baled for export, containing mixed wearable and non-wearable items
- **Used textiles sorted for recycling:** post-consumer and post-industrial materials intended for fibre recycling and remanufacture
- **Used textiles sorted for reuse:** items professionally sorted and intended for second-hand markets (clothing, footwear, accessories, household textiles)

These flows move through a **globally integrated circular system** in which different regions perform **distinct, complementary functions**. Collection and baling occur primarily in Europe and North America; specialist sorting and grading takes place in processing hubs including Pakistan, Tunisia, and across Eastern Europe; and second-hand retail markets are significant across Sub-Saharan Africa, Latin America, and Asia, and are growing within

BIR (aisbl)
Avenue Franklin Roosevelt 24
1050 Brussels, Belgium

T. +32 2 627 57 70
F. +32 2 627 57 73

bir@bir.org
www.bir.org

Europe itself. **These flows are deeply interdependent**: materials collected in one region are sorted in another and sold in a third. **Disrupting any part of this chain** does not eliminate the material but rather **redirects it towards landfill** or incineration in exporting countries, undermining circularity and harming the environment.

The socioeconomic dimension is equally significant. The sector provides accessible livelihoods where formal employment is limited: 98% of respondents in Tanzania report the trade financially benefits their household (UNCTAD/SMEP, 2026), and in Guatemala women account for 57.4% of business owners in the sector, more than double the national average (Garson and Shaw, 2025). These socioeconomic dimensions must be carefully considered in the design of any regulatory response.

II. Evidence on waste fractions and classification challenges

Given the specialised, global nature of this value chain, different regions trade different types of bales at different stages of sorting. Reuse markets in East Africa and Latin America predominantly receive pre-sorted material; sorting and recycling hubs such as Pakistan receive unsorted originals for processing. This distinction matters when interpreting the available evidence. Multiple independent studies, conducted across different regions using direct measurement methods, consistently show that the proportion of imported used textiles that becomes non-reusable waste is a small fraction of total volumes

1–2%

waste fraction in imported bales across East Africa

Kenya — Information Research Solutions (2023) ; Uganda & Tanzania — UNCTAD/SMEP (2026)

0–4%

waste fraction at Kantamanto Market, Accra

Ghana — Ghana Used Clothing Dealers Association (2024); GIZ assessment study (2024)

3.27%

non-recyclable waste within the value chain of Megapaca, the largest secondhand clothing retailer in Guatemala

Guatemala — Garson & Shaw (2025)

The case of Pakistan further illustrates this. At the Karachi Export Processing Zone, 10,000 employees process imported textile materials for regional and global second-hand markets as well as the local recycling industry of Faisalabad. As documented by the National Textile University Faisalabad (2025), even waste generated during the recycling process is further processed and repurposed, with end uses ranging from filling materials and high-quality apparel to insulation and non-woven fabrics.

These findings show that the large majority of material moving through these flows is traded for reuse or recycling, with only a small fraction becoming waste**. Addressing environmental concerns associated with the transboundary movement of used textiles requires classification tools that reflect industry practice**, support legitimate trade in goods, and enable the sound management of remaining waste. **BIR supports the trade code reform proposal** developed by the Centre for Resilience and Sustainable Development of the University of Cambridge, the Textile Recycling Association, and Recycling Europe, which proposes differentiated HS codes distinguishing waste textiles, textiles for recycling, textiles sorted for reuse, as well as garments, footwear, and accessories, and unsorted originals (Habib and Parris, 2024).

BIR (aisbl)
Avenue Franklin Roosevelt 24
1050 Brussels, Belgium
T. +32 2 627 57 70
F. +32 2 627 57 73
bir@bir.org
www.bir.org

BIR calls on Parties to ensure consistent definitions of textile waste and used textiles across the Basel Convention, in coordination with WCO HS Code classifications, to prevent regulatory conflicts and facilitate legitimate trade. Definitions developed under the Convention should be designed to align with and reinforce the parallel WCO HS code reform process, rather than creating further definitional fragmentation across regulatory frameworks. Ongoing stakeholder consultation with industry and importing country representatives will be essential to ensure that any definitions developed are both effective and enforceable in practice.

III. Synthetic fibres: reuse and recycling realities

BIR notes with concern proposals to subject used textiles containing synthetic fibres to heightened regulatory controls, drawing an analogy with plastic waste under Basel Annex II entry Y48. BIR's members bring direct operational experience of how synthetic-containing textiles move through reuse and recycling value chains, and consider that such proposals warrant careful examination.

Textiles, including those containing synthetic fibres, are engineered for repeated use. Their reusability is determined by condition and market viability, not by fibre composition: a polyester shirt in good condition, sorted through professional channels and sold in a second-hand market, avoids both landfill and the production of a new garment. **Restricting trade in such goods on the basis of their synthetic content would not reduce environmental harm but likely increase it by redirecting material towards disposal rather than reuse**.

The existing regulatory framework reflects this reality. The EU REACH Regulation explicitly exempts second-hand textiles from the chemical restrictions applied to new articles, recognising that residual chemical hazards, including those associated with synthetic fibres, diminish through repeated use and washing (De Falco et al., 2019). **Used textiles do not exhibit the toxicity, corrosivity, or reactivity criteria for hazardous classification under the Basel Convention**.

The practical consequences of fibre-based classification would also be significant. An estimated 60 to 70% of post-consumer textiles contain synthetic fibres (European Environment Agency, 2024): applying Annex II controls on this basis would subject the large majority of global second-hand flows to PIC procedures regardless of reuse potential or actual risk. Sorting is largely conducted by skilled professionals whose expertise covers condition, grade, and market viability, rather than laboratory-grade fibre composition analysis. Automated fibre identification exists but remains far from the scale and cost-effectiveness required for high-volume sorting operations, meaning that **such requirements could not be met by the sector as currently structured**, threatening the continued operation of the sorting, reuse and recycling systems on which the circular economy depends.

There is also a demand-side dimension that merits consideration. In Uganda, where average daily disposable income is USD 1.73, a single second-hand garment represents approximately 1.5 days of income, compared to 0.8 to 6.2 days for new clothing (UNCTAD/SMEP, 2026). Restrictions on access to affordable second-hand clothing would

BIR (aisbl)
Avenue Franklin Roosevelt 24
1050 Brussels, Belgium
T. +32 2 627 57 70
F. +32 2 627 57 73
bir@bir.org
www.bir.org

not suppress demand but rather redirect it towards new, low-cost fast fashion or ultra-fast fashion garments, exacerbating the very environmental impacts this process seeks to address.

Synthetic fibre concerns, including microplastic pollution, **are most effectively addressed upstream through eco-design requirements and extended producer responsibility frameworks** applied at the production stage, where the greatest environmental leverage lies.

IV. Policy Recommendations

BIR calls on Parties to:

- **Maintain B3030 as non-hazardous under Annex IX.** Subjecting used textiles to Prior Informed Consent procedures would impose significant administrative and cost burdens on legitimate circular trade without scientific justification, and would risk disrupting the global sorting and recycling operations that currently keep these materials in the economy.

- **Harmonise definitions across regulatory frameworks.** Definitions developed under the Convention should be designed to align with and reinforce the parallel WCO HS code reform process, rather than creating further definitional fragmentation across frameworks. Parties should actively encourage alignment between definitions developed under the Basel Convention and the WCO review of HS code 6309.

- **Avoid reclassifying used textiles containing synthetic fibres as plastic waste under Annex II.** Proposals to apply Y48 or equivalent Annex II controls to used textiles on the basis of synthetic fibre content are not supported by the scientific evidence, contradict the established exemption of second-hand textiles under EU REACH, and would risk disrupting functioning circular systems without addressing the environmental concerns they seek to remedy. Synthetic fibre concerns should be addressed upstream through eco-design and extended producer responsibility frameworks.

- **Ensure inclusive participation of importing country Parties.** Any future measures under the Convention should be grounded in the realities of importing countries, as those who bear the practical environmental, social and economic consequences of regulatory choices around the trade of used textiles.

BIR stands ready to engage constructively with the Secretariat, Parties, and observers to develop practical solutions that protect the environment, support sustainable livelihoods, and strengthen the global circular textile systems that already deliver significant environmental and social value. We urge Parties to ground deliberations in the full body of available evidence, including the systematic field studies from Kenya, Uganda, Tanzania, Ghana, and Guatemala that consistently find low waste fractions in imported volumes, and to ensure that environmental harms are addressed at their source, without hindering the circular flows that already contribute to their prevention.

BIR (aisbl)
Avenue Franklin Roosevelt 24
1050 Brussels, Belgium

T. +32 2 627 57 70
F. +32 2 627 57 73

bir@bir.org
www.bir.org

Bureau of International Recycling

June 2026

Supporting organisations:

Since 1932 SMART SECONDARY MATERIALS® AND RECYCLED TEXTILES

THE ASSOCIATION OF WIPING MATERIALS, USED CLOTHING AND FIBER INDUSTRIES

GHANA USED CLOTHING DEALERS ASSOCIATION

MCAK

MITUMBA CONSORTIUM ASSOCIATION OF KENYA

TUCA

Togo Used Clothing Association

Togousedclothingdealer@gmail.com

+22891588259

BIR (aisbl)
Avenue Franklin Roosevelt 24
1050 Brussels, Belgium

T. +32 2 627 57 70
F. +32 2 627 57 73

bir@bir.org
www.bir.org