



July 31, 2025

Department of Resources Recycling and Recovery (CalRecycle)
P.O. Box 4025
Sacramento, CA 95812

Dear CalRecycle,

We submit the following comments for your consideration following the Textile Stewardship Information Workshop. These comments are submitted on behalf of the Healthy Textiles Coalition, a diverse group of US-based nonprofits, businesses, manufacturers, farms, and ranches committed to the shared goal of developing decentralized natural fiber processing systems. We recognize the urgent conditions brought on by fast fashion including the impacts of microplastics and chemicals from synthetic fibers on our physical bodies, marine and terrestrial ecosystems, and the human and ecological cost of artificially cheap and overproduced clothing and other textiles.

The Responsible Textile Recovery Act of 2024 (RTRA), or SB 707, charges CalRecycle with adopting regulations around the implementation of the extended producer responsibility program that “emphasizes repair and reuse, and minimizes generation of hazardous waste, generation of greenhouse gases, environmental impacts, environmental justice impacts, and public health impacts.” This is no small task, given that the textile industry is plagued by overproduction, made possible by artificially cheap plastic fibers (plastic currently makes up 66% of textile fibers) and the unjust and unregulated dumping of textile waste here and abroad. Fossil carbon-derived textiles will always have a negative impact on society, particularly on front line communities. Plastic textiles, like plastic packaging, are not designed to be recycled, nor will they ever be recycled safely or sustainably. The toxic production, use, and disposal of plastic textiles disproportionately impacts a range of communities, from those living adjacent to fracked gas sites to communities whose waterways and air quality are permeated by micro and macro plastic degradation and incineration in the Global South.

Diverting post consumer textiles from landfills and incinerators will not, by itself, achieve the goals of the Responsible Textile Recovery Act. Given the role that plastic fibers play in our textile system, the Department must also consider directing a portion of fees to rebuild our regional natural and biodegradable fiber industry. If we are to truly reduce climate and environmental justice impacts, as well as increase the success of reuse, recycling and

composting schemes, we must consider how to apply EPR as a mechanism to catalyze systemic solutions.

The current and potential value of regional natural fiber industries include a wide range of ancillary benefits. Rebuilding California's natural fiber manufacturing systems can be designed to direct economic value to existing California fiber producers to expand their implementation of carbon farming/ Climate-Smart ('regenerative') and organic agriculture in our established food and fiber crop rotations. Global commodity markets and offshore mills do not provide California producers the economic value required to expand ecological agriculture practices to the extent that our communities would ideally like to see, and that our state has targeted through AB 1757's Natural and Working Lands Climate Targets. Regional value-add manufacturing networks are already partially in place within the state, and simply require investment to fill in key gaps. When we direct investment to these manufacturing gaps, we will support rural, regional, land-based economies in ways desperately needed, while mitigating the negative environmental and human health impacts of textile macro and microplastic pollution.

To achieve these goals, the undersigned urge CalRecycle to prioritize the following in adopting the implementing regulations for The Responsible Textile Recovery Act of 2024.

I. CalRecycle Should Prioritize Robust Data Reporting, Utilization, Transparency, and Education in Its Implementing Regulations.

Whether the Responsible Textile Recovery Act of 2024 can achieve its stated intent and purposes depends on the collection and dissemination of accurate data and other information regarding textiles made or sold in California. Hazardous waste produced, greenhouse gas emissions, environmental justice impacts, and public health impacts can only be minimized if the extent of those impacts is first understood by CalRecycle and the public. We call on the Department to require all reports and analyses produced for the purpose of the RTRA be reviewed by outside, independent reviewers, and made publicly accessible.

A. Data and Transparency

In its implementing regulations, CalRecycle should require Producers and the Producer Responsibility Organization (PRO) to publicly submit to CalRecycle on an annual basis the type (fiber blend diagnostic) and tonnages of all textiles made or sold in California, as well as a complete account of the ultimate disposition of all covered textile products including, whether those products were recycled, reused, composted, exported, landfilled, or incinerated.

B. Consumer Education and Outreach

Pursuant to RTRA section 42984.10(g), the Producer Responsibility Plan must include a "comprehensive statewide education and outreach program designed to educate consumers and promote participation in the program offered by the PRO." **We urge CalRecycle to require that this education and outreach program incorporate information that encourages**

consumers to make choices that will slow the rate of textiles consumption and the rate of waste generation. As part of this educational outreach and in order to measure the impact of the program enacted under the RTRA, we ask that CalRecycle require producers paying into the program to publicly disclose the number of garments brought onto the market and thus subject to the program as a covered product. This information should also be published in aggregate by the designated PRO.

C. Utilizing Environmental and Public Health Impact Data

We also call on CalRecycle to utilize environmental and public health impact data when establishing, reviewing, and adjusting the program's performance standards, and for the PRO to utilize environmental and public health impact data when developing the needs assessment and eco-modulation criteria. These data should reflect all of the direct and indirect effects of the textile supply chain and waste management streams on regional and international communities. In order to utilize such data, the program costs must cover funding for modeling and analysis of the environmental and human health impacts of the program, taking into account the full life cycle through final disposition of covered products.

D. Labelling Requirements

To improve consumer awareness and accurate textile resource management, we urge CalRecycle to require that all textiles sold in California incorporate the following information on their labels:

- 1) 'Contains plastic': This label will identify any fabric or textile product that contains plastic polymers (petroleum based or not).
- 2) 'Toxic fibers': This label will identify any fabric or textile product produced with toxic dyes, chemicals, or treatments. Viscose or tencel (which can only be produced with significant amounts of chemicals), as well as animal or plant based fibers treated with toxic chemicals in production, would have this label. We recommend at minimum, utilizing the [DTSC's Candidate Chemicals](#) list (including pending chemical additions), to define toxicity of fibers and textiles.
- 3) 'Compostable': This label will identify any textile product that is 100% compostable utilizing natural fibers not treated with toxic chemicals (including fabric, thread, notions).

II. CalRecycle's Implementing Regulations Should Ensure that Fees Established in the Producer Responsibility Plan Incentivize and Support Reduction, Diversion, Reuse, and Recycling.

Section 42984.10 of the RTRA requires the PRO to establish in its Producer Responsibility Plan a "per unit eco-modulated fee that reflects California sales volumes, existing producer collection, repair, reuse, and recycling programs that help achieve the purpose of this chapter, and the cost of reusing, repairing, recycling, or otherwise management covered products." We urge CalRecycle to adopt regulations that set the following guidelines for the establishment of that fee structure:

A. Full Coverage of End of Life Costs

The program fee should fully internalize the costs of waste management, including the cost of collection, sorting, repair, reuse, recycling, education programming, and research. The fee should be set high enough to cover the costs for non-reusable, non-recyclable, non-compostable textiles to avoid a “pay to pollute” incentive. The fees should be based on California’s sales volumes, on a ‘per new garment’ basis. If fees are based on the size and weight of a garment, it does not determine whether or not the item can be reused, recycled or safely decomposed. **All new garments must pay a fee.**

B. Effective Eco-Modulation

The eco-modulated fee structure should account for a material’s environmental justice impacts on regional and international communities. **100% natural fiber textiles and California-sourced natural fibers that are not treated with chemicals on the [DTSC’s Candidate Chemicals](#) list (including pending chemical additions), should incur lower fees.**

C. Allocation of Fees Consistent with California’s Waste Hierarchy

The textile recovery operations funded by collected fees should be sorted according to the following tiers so that the funding appropriately reflects California’s hierarchy of waste management practices:

Tier 1 (collectors and aggregators): Maximum of 28% of program funding

Tier 2 (sorters): Maximum of 28% of program funding

Tier 3 (recycling, repair, upcycling, and reuse markets): Minimum of 29% of program funding. Within this tier, funding distribution must be prioritized based on California’s hierarchy for waste management practices pursuant to Section 40051. We recommend a minimum of 80% of this funding goes into reuse, repair, and upcycling programs.

In addition, a **minimum of 10% of the funding** derived from program fees should be **invested in California’s regional natural fiber manufacturing infrastructure.**

D. Discouragement of Waste Colonialism

The Responsible Textile Recovery Act of 2024 indicates that existing producer collections, including but not limited to, take back programs, can qualify for fee reductions or alternative funding. At present, existing collection programs are not 100% guaranteed to divert clothing from landfill or offshoring.¹ For example, the Kantamanto Market in Accra, Ghana receives [15 millions garments](#) per week, around 40% of which is considered unsellable and discarded as waste, leaving surrounding communities to carry the environmental, economic, and human health burden. **Strong minimum standards must be set for which collection programs can**

¹ Take-Back Trickery: An investigation into clothing take-back schemes. (n.d.). In <https://changingmarkets.org/wp-content/uploads/2023/07/Take-back-trickery.pdf>.

qualify for fee reductions or funding, and strong minimum standards for collected items, as to discourage waste colonialism practices.

III. CalRecycle Should Set Clear Rules that Foster an Aggressive Transition from Fossil Carbon-Based Textiles to Regenerative Natural Fibers.

The Extended Producer Responsibility Program created by the RTRA can only achieve the stated goals of “minimizing hazardous waste, greenhouse gas emissions, environmental impacts, environmental justice impacts, and public health impacts” if it accelerates a transition away from fossil carbon-based textiles and towards safe, non-toxic, climate-friendly natural fibers. We urge CalRecycle to help guarantee this transition by adopting regulations that achieve the following:

A. Reduction in Fossil Carbon-Based Textile Production and Investments in Regenerative Natural Fibers

Section 42984.10(n) of the RTRA requires that the Producer Responsibility Plan must “develop strategies to address design challenges for covered products, including, but not limited to, compostability, reduction and removal of harmful chemicals, microfiber and microplastic shedding, and mixed material blends.” These aims cannot be achieved without a significant reduction in the production and sale of fossil carbon-based textile products.

Natural fibers derived from the biosphere, in contrast with geosphere-based feedstocks, offer one of the most promising pathways to a truly circular textile system. When they’re produced without harmful additives or chemical treatments — and after they’ve been upcycled, repaired, and reused — these fibers can be safely returned to the pedosphere (soil), where they biodegrade and complete their carbon cycle.

Textile materials that are safe to eventually return to pedosphere based carbon pools at the very end of their life are also safe to be integrated into our ecosystems throughout the inevitable process of fibers sloughing off and being released through normal wear and use, including laundering. **CalRecycle should adopt regulations that require the Producer Responsibility Plan to limit fossil carbon-based textile production, incentivize natural fiber production, and provide for infrastructure investments to support California-grown nature fiber textile production, processing, repair, upcycling, and reuse.**

B. Exclude Chemical Plastic Processing From the Definition of Recycling

Chemical plastic processing, sometimes called “Advanced Recycling” or “Chemical Recycling” involves using technologies such as gasification, pyrolysis, and others to break down plastic waste into gases, chemicals, tars, oils, waxes, lubricants, and toxic waste byproducts. These processes are inherently toxic and climate damaging, and the facilities that use these

technologies are predominantly located in front line communities throughout the United States.² While the American Chemistry Council and its members claim that “some” plastic textile is recycled via these methods, their own numbers indicate recycled content is less than 10% of any new product, indicating the outputs of such recycling processes still rely heavily on the continued use of virgin material, and contribute to the proliferation of fossil carbon-based textile production. **CalRecycle should adopt regulations that clarify that these technologies do not qualify as “recycling” under the RTRA.**

IV. CalRecycle’s Implementing Regulations Should Ensure Adequate Oversight and Enforcement.

Oversight and enforcement are critical to the RTRA’s success. We urge CalRecycle to adopt the following rules to ensure adequate oversight and enforcement:

A. Distribution of Producer Penalties Through a Remediation Fund

Pursuant to section 42984.21(d), CalRecycle shall “deposit all penalties collected pursuant to this section into the Textile Stewardship Recovery Penalty Account”. **CalRecycle should ensure that communities on the front lines of receiving undue quantities of textile waste are the beneficiaries of this remediation fund.** We would like to see the money collected into the Textile Stewardship Recovery Penalty Account from producer penalty fees, distributed through an environmental remediation grants program that serves those communities negatively impacted by the fashion industry. This includes distribution to international secondhand markets, and not only limited to statewide programs. It is widely known that communities currently receiving California’s textile waste carry the economic, environmental, and human health burden from the overproduction, overconsumption, and subsequent secondhand shipments of material that falls out of our endemic second hand markets and is distributed through textile industry take-back programs.

B. Diverse and Transparent PRO Governing Board

Section 42984.4(a)(2)(A) of SB 707 requires the PRO to have a governing board “consisting of producers that are diverse in size and type and that represent the diversity of covered products placed in the market by those entities,” and that “may include ex officio members involved in the collection, sorting, repair, reuse, recycling, or management of covered products.” **CalRecycle should adopt regulations that require a diverse range of “ex officio” members, to guarantee that interests related to reuse, recycling, sorting, and international secondhand markets are represented on the PRO Board.** California’s textile system and consumption has a lasting environmental justice impact both statewide and internationally, and it is important to hear from the voices that this system both consists of, and influences. **CalRecycle should also adopt regulations that require all PRO Board meetings to be held**

²Just Zero. 2022. “LOOPHOLES, INJUSTICE, & THE “ADVANCED RECYCLING” MYTH.” In <https://just-zero.org/wp-content/uploads/2022/12/2022-12-14-Just-Zero-Advanced-Recycling-Report.pdf>.

publicly to ensure full transparency and accountability by producers.

In conclusion, diverting textiles from landfills and incinerators is necessary — but not enough to meet the goals of the RTRA. To truly reduce climate and environmental justice impacts, we must invest in regional natural fiber systems as part of a broader, circular approach. EPR funding can and should be used to close key manufacturing gaps, enabling California's fiber producers to scale regenerative practices and build value-added networks that support both ecological and economic resilience. We urge CalRecycle to act on this opportunity, and we remain hopeful the Department will lead with the ambition this moment calls for.

Sincerely,
The Healthy Textiles Coalition

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