



May 19, 2021

Statewide Commission on Recycling Markets and Curbside Recycling
Submitted via email

RE: Support to include textiles policy proposal in the Commission’s upcoming report(s)

Dear Statewide Commission on Recycling Markets and Curbside Recycling,

Thanks for the support and thoughtful feedback from the three readings of CPSC’s proposed policy on hospitality textile recycling by the Market Development Committee on March 22, April 12, and May 10, 2021. The undersigned brands, businesses, and organizations have read the public version of the public policy shared with the Committee on May 10, 2021.

Textile management is complicated given the wide breadth of product types within the material category and very few are eligible for recycling, except when focusing on hospitality and home textiles due to their simplicity in material composition and ease of identification, collection, and processing. The proposed policy offers cost relief for the strained businesses burdened with linen management without convenient collection and end-markets for unusable textiles. The proposal presented by CPSC engages producers in an end-of-life solution for a growing material stream while providing a greater access to feedstocks needed to reach voluntary recycled content goals set by the textiles industry.

We urge the Commission to include this proposal in the upcoming report(s) as a “low-hanging fruit” and an easy first step to improve textile management in California in a manner that supports the waste hierarchy, promotes innovation, creates jobs, and reduces textile disposal.

Sincerely,

Doug Kobold, Executive Director
CPSC

Colleen Foster, Environmental Officer
City of Oceanside

Heather Podoll, Partnership and Advocacy Coordinator
Fibershed

Alexis Miller Lettis, General Counsel & Director of Sustainability
Regent Apparel, Inc

Karla Magruder, Founder
Accelerating Circularity

Connie Ulasewicz, Founder
CBU Productions
Professor Emeritus CSUSF

Tasha Henneman, Chief of Staff, Office of the President
Goodwill San Francisco, San Mateo and Marin Counties

Krystle Moody Wood
Founder & Principal Consultant
Materevolve, LLC.

Nicole Kenney, Circular Materials Consultant

Shana Levy McCracken, MA, Green MBA, Founder, CEO
4R Fashion

Nicholas Brown, Policy Director
Fashion Revolution USA

Executive Committee of the Prevention Reuse and Repair Technical Council of CRRA:
Jessica Aldridge, Director of Sustainability and Zero Waste Programs, Athens Services
Julie Haas-Wajdowicz, Environmental Resource Coordinator, City of Antioch
Chrise deTournay Birkhan, Commissioner, City of Berkeley Zero Waste Commission
Shana Levy McCracken, Chair of the Prevention Reuse and Repair Technical Council of CRRA

CC: John Davis

Committee Chair: Davis

Committee: Market Dev't

Policy Title / Subject: *Hospitality Textile Recycling*

Date(s) before above Committee: *March 15, April 12, and May 10*

Date(s) before full Commission: *May 19*

Primary Author(s): *Commissioner John Davis and the
California Product Stewardship Council*

Status: *First reading at full commission*

Background: Textile recycling is complicated as many fabrics have several blended fiber types and other design additives, such as closures and finishing chemicals, thereby deteriorating the recyclability of these products. Industry leaders have [identified commercial hospitality textiles](#) as low-hanging fruit and as more [homogeneous fiber](#) content, with an potential existing collection infrastructure already existing through industrial laundries. Textile recyclers are scoping hospitality textiles as a viable feedstock over clothing, which has more barriers to recycling, such as finishing chemicals, zippers, labels, etc. In September 2020, CPSC hosted a "Textile Stewardship Policy" meeting attended by major brands and industry associations discussing hospitality textiles as "low-hanging fruit", which is aligned with the industry's goals.

In 2018, synthetic clothing and other textiles were the 5th most common material thrown out by single-family households in California. By combining the subcategories of organic textiles (1.1%), synthetic and mixed textiles (1.6%), and shoes, leather, and purses (0.3%), textiles accounted for 3% of California's overall waste in 2018. A recent [characterization](#) of unsellable textiles at a large thrift found 8% to be sheets, towels, fabric window coverings, and other similar products.

Hospitality textiles include sheets, towels, linens, workwear, and interior fabrics, such as mats and fabric window coverings. An [industrial laundry](#)

can either be an on-premise laundry (OPL) or an independent facility servicing hospitality institutions (restaurants, hotels, and other related industries). Industrial laundries already collect [unusable textiles](#) rejected from use for a [variety of reasons](#) and need help with scaling up collection, sorting, and processing textile products to achieve the highest and best use.

Recycled fiber hospitality textiles will be highly desired as the textile industry as a whole has set voluntary recycled content goals. The Textile Exchange leads a working group for hospitality textiles. The [Home and Hospitality Round Table \(H+HRT\) Summit meeting](#) was held virtually on December 10, 2020 and identified textile collection as a priority for 2021.



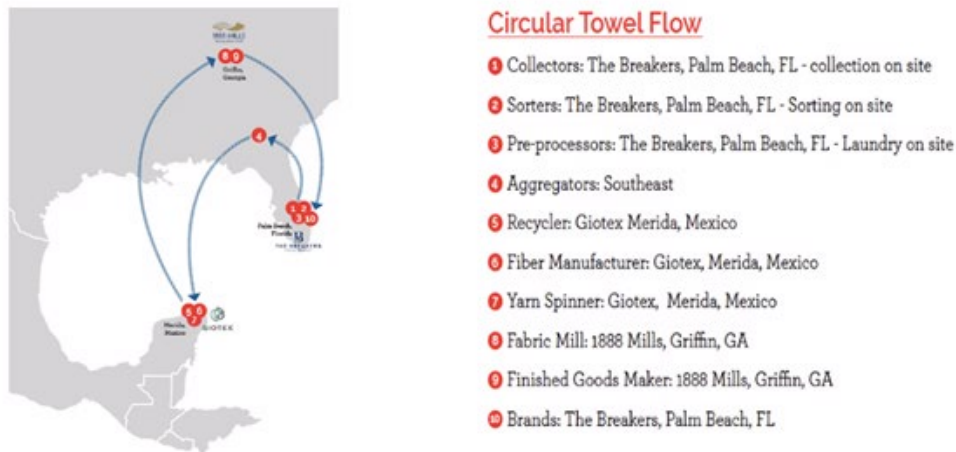
Figure. A visual representation of what was discussed at the Textile Exchange’s Home and Hospitality Round Table Summit meeting held virtually on December 10, 2020. Artist credit: Carlotta Cataldi.

Previous research has shown that more businesses, such as in the medical and tech industry, will be switching to reusable textiles to reduce [linen waste generation](#), [GHG impact](#), and the risk of [supply-chain disruptions](#), as seen with [single-use PPE during the COVID-19 pandemic](#). As industrial

laundries grow in clientele and material types that could be washed, producer-funded recycling options provide cost relief for the textiles with no markets for reuse.

On April 14, 2021, an industry funded nonprofit, “Accelerating Circularity”, hosted a webinar and featured a “Towel” model they mapped as a realistic example of textile circularity in the US.

Towel Model



Modeling & Linking Report Webinar 04/14/2021

Figure. A model showing potential partnerships for a hospitality textile recycling program as presented by Accelerating Circularity on April 14, 2021.

Stewardship programs in California, such as carpet and mattresses, have invested consumer fee money in fiber collection and recycling infrastructure that will be co-beneficial for additional programs coming onboard with similar materials. For example, the mattress stewardship program landfills textiles since with no recycling markets and the California mattress consumer fee should NOT bear the burden of solving the entire problem.

This EPR program for hospitality textiles could be seen as proactive, leveling the playing field, and serve as an accelerator for textile product

design that generate less GHG in fabric production and produce products that can easily be reused, repurposed, or recycled. The hospitality industry already [acknowledges an](#) urgent need for climate legislation, focused on reporting and performance. This will help to ensure that the responsibility for improving an environmentally appropriate sustainable supply is shared throughout the value chain, not just falling on government, but also be a responsibility for operators and investors as well.

Purpose(s): *Collection, sorting, repurposing, reusing, or recycling unusable hospitality textiles.*

Would this policy proposal require legislation, or interaction with an agency other than CalRecycle? *Yes. Legislation required. Interagency interaction with State Licensing Board, CalRecycle, and Public Health.*

Possible 2021 Legislative Priority? 2022 would be a good year to introduce. It is in the hospitality industry's interest to separate themselves from garments and accessories and to create their own program for the more recyclable, reusable, and repurposable textile products that are easier to manage.

Does this proposal require additional funding or changes to resource allocation? No funding would come from the users of the products (i.e. hotels, restaurants, and other industries), as an EPR program assesses the fee to the manufacturers of the textile products. These fees would be used to fund the operation of a 501c3 nonprofit stewardship program that meets legislated performance goals and transparency requirements. Funds will cover oversight costs. Program costs will reduce as more textile product supply companies progress towards their voluntary recycled fiber minimum-content goals. Textile Exchange's 2030 Strategy: [Climate+](#) sets CO₂ emission reduction goals for producers while identifying preferred fibers, such as organic cotton and recycled polyester, as key switches for success.

Proposal(s):

- Option 1: Add language to:
 - [C.A. HSC § 104.15.1 Section 118425 \(ARTICLE 3. Common Towels added by Stats. 1995, Ch. 415, Sec. 6.\)](#)
 - [C.A. HSC § 104.15.1 Section 118430 \(Article 4. Wiping Rags added by Stats. 1995, Ch. 415, Sec. 6.\)](#)
- Option 2: Add Article 5 on End-of-life management for textiles.
- Option 3: Introduce comprehensive definition and responsibilities for industrial laundries. Example: [AB 2679 \(O'Donnell, 2018\). Health facilities: linen laundry.](#)

Add to the HSC regulations cited above. On or before January 1, 2025 all permitted industrial laundry facilities will offer segregated textile products for recycling to their commercial customers.

Collection entity: An industrial laundry can either be an on-premise laundry (OPL) or an independent laundry company servicing large institutions (restaurants, hotels, hospitals, industries) that require a constant flow of clean linen, work wear or uniforms. Industrial laundries can serve as the primary collection sites for their own materials and other sources of covered products, such as thrifts or uniform retailers.

Covered products: Work staff wearing apparel, underclothing, bedding, bedclothes, rags, or towels. Could be expanded to include all other interior fabrics, such as mats and fabric window coverings laundered at industrial laundries. Other potential products, not included in original statute definition, could be robes and duvets.

Responsible producers: Manufacturers of covered products selling covered products into California will pay into the Stewardship Organization(s). Not many hospitality textile brands overlap with consumer garment brands and therefore might not be widely recognizable brands.

Funding mechanism: All responsible producers/manufacturers will pay modulated fees based on:

1. Lower fees for both mono-fiber textiles and 100% natural fibers.
2. No fees for producers that:
 - a. Use California-sourced natural fibers that are not treated with chemicals on the DTSC's Candidate Chemicals [list](#),
 - b. Use natural fibers on the USDA organic natural fibers list, or
 - c. Are B-corps with a takeback program that includes repair/reuse.
 - d. No fees for reusable diaper companies.
3. Phase-in higher post-consumer minimum recycled content, starting at 15% by 2030 and increasing regularly thereafter.

Fees paid on the covered products into a stewardship organization (SO) that carries out the program requirements (payment amounts determined in SO Plan) will be used to support industrial laundry facilities to collect and sort hospitality textiles for reuse, repair, and recycling from other laundries, thrift stores, and MRFs. Resident collection conveyed through thrifts and other curbside options. The SO must be a 501(c)3 with at least one repair representative and one thrift store representative on the board. Funding to cover collection, transportation, sorting, repair and other recycling.

Convenient access standard: Designate industrial laundries to pool materials from other designated collection locations, such as other laundries, thrift stores, and other reuse organizations to send textiles for reuse and recycling.

Performance standards: Sort textiles no longer suitable for their initial intended purposes. Industrial laundries must prioritize reuse and repurpose over recycling by working with community partners, such as SPCA for animal use of sheets and towels.

Financial Incentives provided to:

1. Retailers and users of this product will receive financial incentives by reducing their disposal costs for unwanted textiles and providing free access to recycling collection. Green design

will be incentivized by charging producers of those products little to no assessments and the SO Plan will develop grants and subsidies to incentivize green purchasing.

2. Inbound transportation from other textile generating locations to the designated collection site at an industrial laundry.
3. Consolidation at designated industrial laundries collecting covered products for recycling/reuse and the costs of microfiber filtration devices. This is the first example of producer responsibility for microfiber prevention in policy, an important precedent to set.
4. Transportation for reusable textiles to the most environmentally preferable processors, such as a repair service that may be further away, but should be prioritized over recycling.
5. Support pre-processing and processing costs to repair, repurpose, or recycle covered products.
6. Transportation for recyclable textiles to most environmentally preferable processors.
7. No funds for recycling without technology disclosure. Follows current state recommendations for preferred recycling technologies as prescribed by CalRecycle.

Annual Reporting: SO should report to CalRecycle annually the list of participating producers, eligible recyclers and processors, volume of collected textiles sorted by product type (sheets, towels, uniforms) and fiber content (cotton, polyester, blend), and reasons textiles were recycled. SO will also report volume diverted into reuse or repurposed uses.

This proposal is a great first step to carve out the recyclable and reusable textiles from less recyclable garments and provide a platform for cross sector collaboration and collective purchasing power. A program providing a large volume of clean homogenous textiles will attract recyclers and other enterprises using these textiles for new products to site in-state.

Related Issues: *Textile Recycling, Industrial Laundry*

Bibliography

1. [Huge market potential in removing substances of concern from circular economy](#)- ChemSec, 2/24/21
2. [Textile Exchange Sustainability Conference Overview Report](#)- Textile Exchange, 11/2020
3. [Hospitality Linens](#)- National Association of Institutional Linen Management. Accessed 4/2/21
4. [Industrial Laundry](#)- CINET Professional Textile Care. Accessed 4/2/21
5. [Recycle Linen](#)- American Reusable Textile Assoc. Accessed 4/2/21
6. [Linen Life, Replacements and Rejects](#)- ALM Journal, Summer 2013
7. [Policies Promoting Clothing Reuse, Repair, & Repurposing](#)- CPSC, 11/10/20
8. [Home and Hospitality Round Table Summary](#)- Textile Exchange, 12/2020
9. [An Environmental Analysis of Reusable and Disposable Surgical Gowns](#)- AORN Journal, 3/2020
10. [Life Cycle Assessment of Cleanroom Coveralls: Reusable and Disposable](#)- Journal of Pharmaceutical Science and Tech., 1/11/18
11. [Personal Protective Equipment Supply Chain: Lessons Learned from Recent Public Health Emergency Responses](#)- Health Security, 6/2017
12. [Why hospitals are beginning to reuse or recycle oxygen masks, IV bags, surgical tools they used to throw out](#)- CBC, 3/6/21
13. [Sustainability-Driven Legislation – Setting The Right Conditions For Hospitality? A Review Of Viewpoints](#)- HospitalityNet, 3/29/21
14. [Textile Exchange's 2030 Strategy: Climate+](#). Accessed 4/27/21.
15. [C.A. HSC § 104.15.1 Section 118425 \(ARTICLE 3. Common Towels\)](#)- California Legislative Information. Accessed 4/2/21
16. [C.A. HSC § 104.15.1 Section 118430 \(Article 4. Wiping Rags\)](#)- California Legislative Information. Accessed 4/2/21
17. [AB-2679 \(O'Donnell, 2018\) Health facilities: linen laundry](#)- California Legislative Information. Accessed 4/2/21