



August 29, 2024

Environment and Climate Change Canada  
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To whom it may concern:

**Re: Consultation – addressing plastic waste and pollution from the textile and apparel sector**

Thank you for the opportunity to comment on the consultation document.

Our recommendations for the Roadmap are as follows:

- Prioritize interventions that seek to reduce the amount of textiles and apparel placed on the Canadian market and to ensure that these products are durable. This will require cross-departmental co-operation to address imports, duties and industrial strategy related to durable textile and apparel manufacturing.
- Reject false solutions to address textile and apparel waste, such as chemical recycling.
- Explore the possibility of a national stewardship system, overseen by the CCME and funded by first importers of apparel and textiles, to scale up convenient take-back programs that prioritize repair and reuse.
- Undertake an assessment of micro- and nanoplastic shedding from textiles and explore regulatory approaches to eliminating products and materials that are most likely to shed during production, use and disposal/recycling.
- Include the identification and elimination of toxic chemical additives in textiles and apparel, including PFAS and flame retardants, in the Roadmap.
- Ensure that the Plastics Registry is effectively tracking plastic in textiles and apparel, including exports of used and waste materials.
- Stop exports of used clothing and textiles, which currently serve as a release valve for over-consumption of low-quality and short-lived apparel and textiles

in Canada while flooding the Global South with textiles that harm local economies and pollute the environment.

- Adopt the zero waste hierarchy, which is in line with reducing waste and embracing a circular economy.

The sheer volume of synthetic (plastic) apparel and textiles imported into Canada, sold and used for a short time before being discarded makes this sector an important target for measures under Canada's strategy to end plastic waste and pollution. Worldwide, a majority of textiles are now made from plastic fibres such as polyester.<sup>1</sup>

The consultation document points out that 95 per cent of the products in this sector are imported and that the global industry is responsible for 10 per cent of the world's carbon emissions. Textile and apparel waste is estimated to account for 6 per cent of Canada's plastic waste by weight.<sup>2</sup>

These data suggest that the key to addressing pollution and waste from textiles and apparel is to adopt measures that seek to reduce the production and consumption of short-lived products made of synthetic fibres. Ensuring that products entering the market are durable and can be effectively collected and repaired, if necessary, and reused and then recycled at end of life requires a shift in the market from what is being made, sold and discarded today.

We therefore strongly urge the federal government to avoid a focus on measures in the Roadmap that support attempts to collect and more effectively manage what is on the market today at end of life, including funding for recycling infrastructure. Unless and until there has been a rationalization of products put on the market in Canada and the development of improved circuits for reuse and repair of textiles and apparel, throwing money at recycling is a fool's errand that will not serve to reduce the amount of plastic pollution and waste generated from the full lifecycle of textile and apparel products.

What's more, so-called "chemical recycling" has remained an elusive – and expensive, energy-intensive and polluting – project for treating plastic waste. Our research<sup>3</sup> suggests it is a false solution to address plastic waste and pollution,

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<sup>1</sup> Bauer et. al., "Limits to Plastic Growth: Towards a global cap on primary plastics production," Lund University, 2024

<sup>2</sup> ECCC, Consultation document, 2024

<sup>3</sup> Environmental Defence, *The limits of plastic recycling: why we need to reject false solutions and reduce plastic*, 2023:

<https://environmentaldefence.ca/wp-content/uploads/2023/05/Briefing-Note-Reject-chemical-recycling-May-2023.pdf>

including for the textile and apparel sector. **Chemical recycling should not be supported through public funding or regulatory incentives.**

Instead, **we recommend that ECCC strike a cross-department working group to focus on upstream measures to:**

- Reduce the amount of low-quality and short-lived synthetic apparel and textiles imported for sale in Canada
- Support local textile and apparel industries that prioritize the use of natural fibres and manufacture durable products that can be repaired and reused.
- Eliminate duty drawbacks and any other fiscal incentives for the over-importation of products into Canada and the destruction of products that are not sold
- Support local initiatives to repair and reuse textiles, apparel and other products.

Further, **we recommend that ECCC use tools available under the *Canadian Environmental Protection Act* to address pollution related to plastic textiles and apparel:**

- Assess textile and apparel products on the market today with a view to
  - eliminating PFAS, flame retardants and other toxic substances from use in textiles and apparel
  - identifying product and material types that shed micro- and nano-plastics during production, use and disposal/recycling and apply mitigation measures to eliminate these products and materials. Such an approach on microfibre shedding could include performance standards that producers would be required to meet to prevent the release of microfibres at all phases of the product's life cycle. We are, however, unaware of existing standards that could be adapted for this purpose.

Data is crucial to pinpointing environmental hazards posed by synthetic textiles and apparel that are placed on the Canadian market. The proposed federal **Plastics Registry is a good start but must be updated to include 3 additional requirements for reporting:**

- End-of-life outcomes for consumer apparel and textiles
- Exports of discarded plastics, including textiles
- Hazardous chemical additives that are present in plastic products, including textiles and apparel, that are imported or manufactured in Canada and placed on the market, such as PFAS and flame retardants.

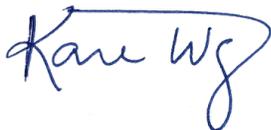
The textiles consultation document has identified a lack of producer responsibility for the full lifecycle of textiles and apparel. We recommend that the federal

government, in concert with environment ministers from the provinces and territories through the Canadian Council of Ministers of the Environment (CCME) **design a Canada-wide stewardship program for textiles and apparel.** First importers could be required to pay eco-modulated fees for the products they put on the Canadian market. Revenue from these fees could be used to broaden accessible take-back programs for textiles and apparel. Existing programs operated by municipalities and non-profit organizations and new programs could receive funding under the scheme. Eco modulation would serve to disincentivize the importation of low-quality fast fashion and other textiles designed for a brief use.

Finally, the “waste hierarchy” to which the draft document refers is outdated and incompatible with the principles of a circular economy approach that seeks to prevent unnecessary extraction and use of virgin materials, maintain materials in use for as long as possible and avoid creating discards and waste.<sup>4</sup> The “Zero Waste Hierarchy” is more appropriate, with Zero Waste defined as “(t)he Conservation of all resources by means of responsible production, consumption, reuse, and recovery of all products, packaging, and materials without burning them and with no discharges to land, water, or air that threaten the environment or human health.”<sup>5</sup> **We urge ECCC to adopt the Zero Waste Hierarchy,** which classifies the burning of waste as undesirable, and prioritizes a wider range of upstream activities than the outdated waste hierarchy.

We thank you for the opportunity to comment on the consultation document and would be pleased to discuss any of these recommendations further and to participate in the proposed stakeholder webinar.

Sincerely,



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<sup>4</sup> See Zhang et al, “An overview of the waste hierarchy framework for analyzing the circularity in construction and demolition waste management in Europe,” *Science of the Total Environment*, Volume 803, 10 January 2022, for a comparison of a circular economy with a waste hierarchy framework. Article accessed at <https://www.sciencedirect.com/science/article/pii/S0048969721049676#bb0035>

<sup>5</sup> International Zero Waste Alliance, 2022, available at <https://zwia.org/zwh/>