8 December 2025

EPR ON TEXTILES - STATEMENT ON THE NEED TO CLARIFY PPE AND MEDICAL DEVICES ARE OUT OF SCOPE

We, the undersigned associations, would like to **express our concern following the beginning of the transposition of Directive (EU) 2025/1892, also known as The Revision of the Waste Framework Directive for Textiles and Food Waste, in Member States.**

Personal protective equipment (PPE) and medical devices (MD) are a small subset of garments essential for ensuring protection and performance of persons in critical sectors, including for health and safety personnel and those working in challenging environments, often contaminated with chemical, particulate or biological hazards (e.g. spill clean-up, emergency response to chemical or nuclear disasters, asbestos removal, clean-room applications in micro-electronics or pharmaceutical production, nuclear industry maintenance). To serve this unique and indispensable function, these products are engineered and tested to meet the stringent requirements set out in standards to comply with the PPE Regulation (2016/425) and the MD Regulation (2017/745). It is important to note that PPE is used continuously across healthcare facilities by all categories of staff, not only in surgical settings. Many analyses that focus on surgical drapes and gowns — used in limited parts of hospitals — overlook the far more extensive use of PPE across healthcare environments, and thus underestimate the complexity, contamination risk and limited circularity potential of such products.

Recital 28 of Directive (EU) 2025/1892 states in part,

"…*Products for professional uses, including safety uses, that can pose safety, health or hygiene risks, or raise security concerns should be excluded from the extended producer responsibility established for textile, textile-related and footwear products listed in Annex IVc*…".

This is a small but important part of the Recital that, if overlooked, could have very harmful consequences for both human and environmental well-being if there is a lack of segregation between household textiles and PPE for both medical and professional use. We already see this harmful mistake playing out in Spain and the Netherlands where PPE and MD are included in the scope of the EPR for textiles unknowingly by national authorities leading to confusion and worry about improper disposal of hazardous materials.

The problem is due to the way the Directive identifies the products in scope. Annex IVc of Directive (EU) 2025/1892 lays out the products in scope of the EPR using CN codes. The CN codes do not make a distinction between the apparel textiles covered by the EPR and PPE, as **within the table in Annex IVc, there lies the codes that relate to PPE and medical devices such as surgical gowns and drapes among others**. As these products are used to protect the wearer from exposure to various types of risks including radiological, biological and others. These garments get contaminated and thus become hazardous waste.

Contaminated PPE, whether it is medical or industrial, must be incinerated due to safety concerns, almost always with energy recovery. Contaminated PPE is considered as hazardous waste whose disposal is already regulated in Articles 13, 17, 18, and 19 of the existing Waste Framework Directive.

It is important to remember that this revision does not apply to those sections of the existing Directive. This would seriously increase the risk of cross contamination of non-hazardous and hazardous waste which is a major concern for human health and the environment.

We also feel that there needs to be clear guidance on how shoes, and particularly safety shoes, are addressed under the Textiles EPR. Like other forms of PPE, safety shoes also become contaminated, severely limiting their recyclability potential and posing a risk to public and environmental health should they be improperly disposed of. The return of safety shoes under the EPR framework is also unclear as product warranties and conformity cannot be guaranteed by the manufacturer in the case of potential reuse. Guidance is also necessary for understanding how fee scaling based on weight would work, especially with heavy shoes, for example, steel-toed boots. We are unsure of how these would be appropriately calculated.

Moreover, PPE waste constitutes less than 1% of all textile waste in Europe, out of which an estimated 80-90% is treated as either hazardous or contaminated waste. This leaves very low volumes of PPE/MD waste that could be potentially recycled or reused. The PPE and MD are mostly used in either a professional or industrial setting. The wide transport across the EU would be needed to attain the volumes for adequate recycling, this would have little environmental benefit. Sorting out non-contaminated/non-hazardous PPE waste would need to be precise and well implemented across Member States to prevent the potential contamination of household textile waste streams. This would seriously increase the risk of cross-contamination of general non-hazardous textile wastes which is a major concern for human and environmental health.

Recommendation

Therefore, we the undersigned, urge the European Commission to **issue clear guidance for Member States clarifying that,** due to the health and safety risks that these would pose to both humans and the environment, **products that comply with the PPE Regulation (2016/425) and the MD Regulation (2017/745) are outside the scope of this regulation.**

Signatories

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The voice of NONWOVENS

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