



## **Open Letter to the United Nations Environment Programme**

We, the undersigned representatives of the global textiles collection, reuse, and recycling industries, together with policymakers and academic experts, write to express our concerns regarding the United Nations Environment Programme (UNEP) Circularity and Used Textile Trade Project, which seeks to establish global guidelines to distinguish used textiles from textile waste.

While we commend UNEP's crucial efforts to address textile sustainability and circularity, we approach this project with serious concern due to its significant global implications. We do not believe the process has been conducted with full rigour and impartiality, leading to the proposal of unworkable global guidelines which risk seriously impacting the livelihoods of millions involved in the collection, sorting, import/export, and sale of second-hand clothing, while also undermining genuine circularity and access to affordable clothing.

We believe that transparency and inclusivity are essential, yet the research conducted in Ghana, Kenya, Pakistan, and Tunisia lacks a credible, evidence-based foundation for the production of global guidelines. Our concerns include:

- **Data integrity concerns:** Textile waste figures cited in the project are inconsistent with previous studies and established industry observations. Key data has been presented without disclosure of collection methods, analytical processes, or validation, limiting stakeholders' ability to engage meaningfully.
- **Insufficient stakeholder inclusion:** Although stakeholders have been consulted through workshops and a survey, actors report not being included in meaningful participation. While global dialogues are complex, consultations have been marked by rushed timelines, limited access to draft materials, and the dominance of certain voices, thereby hindering the collection of comprehensive, impartial input.
- **Lack of methodological transparency:** Foundational definitions of "waste" appear to have been applied without disclosure or review, even as global criteria are being proposed.
- **Risk of conflict of interest:** In Ghana, research and stakeholder dialogues were led by an NGO with a pre-existing waste advocacy campaign and financially supported by the ultra-fast fashion industry.

In light of these concerns, we respectfully call on UNEP to:



- Immediately suspend the advancement of the current draft global guidelines until the underlying research foundation has been validated and found to be reflective of global trade realities.
- Ensure full transparency by publishing the research methodologies, data sources, and definitions used in all four countries, enabling independent scrutiny and peer review.
- Engage independent, regionally grounded experts and practitioners to support the development of genuinely inclusive, evidence-based global guidelines that reflect the complex realities of the secondhand textiles trade.

We urge UNEP to view these recommendations as an opportunity to strengthen the legitimacy and impact of this important work. We remain open to constructive dialogue and stand ready to collaborate toward a fair and sustainable global textile economy.

Signed,

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Teresiah Wairimu Njenga, Chairperson, **Mitumba Consortium Association of Kenya**

Ezenwata Nnago, President, **Togo Used Clothing Dealers Association**

Mustafa Sattar, CEO, **Retex Global (Pvt) Limited**

Henry Treku and Samuel Ofori-Gymapoh, Co-founders, **Landfills2Landmarks**

Wanjiku Muturi, Nominated MP, **Kenyan National Assembly**

Dr Brian Mangwiro, Senior Advisor, **Abalon Capital**

Prof. Stephen T. Odonkor, Fulbright Scholar and Associate Professor of Public Health and Environmental Management, **Ghana Institute of Management and Public Administration**

Brian London, President, **Secondary Materials and Recycled Textiles (SMART)**

Arnaud Brunet, Director General, **Bureau of International Recycling (BIR)**

Julia Ettinger, Secretary General, **Recycling Europe (formerly EuRIC)**

Alan Wheeler, CEO, **Textile Recycling Association (TRA)**

Karolina Skog, Chairwoman, **Nordic Textile Network**



Lars Råsberg, Secretary General, **Human Bridge**

Mattias Wallander, CEO, **USAgain**

Lisa Jepsen, CEO, **Garson & Shaw**