

# Blind spots in textile recycling

## Fashion's sustainability claims overlook workers' rights



The garment industry places increasing emphasis on sustainability and circularity in response to growing demand for responsibly produced clothing. Several brands have started to offer 'take-back' schemes, enabling customers to hand in their unwanted garments. Others offer repair services to extend the life cycle of garments. Some have also launched online reselling platforms or even offer second-hand clothes in stores.<sup>1</sup> Multiple brands also promote 'sustainable' collections that make use of recycled materials, such as recycled cotton or polyester.<sup>2</sup>

At first glance, the various brands' efforts might seem like a green and sustainable way to reduce the industry's environmental footprint and waste. Yet not only do recycling and circularity initiatives fail to address the underlying problem of fast fashion's negative impacts – namely, the overproduction of cheap, low-quality clothes. But, in addition, brands' recycling and circular economy strategies largely overlook a key factor: the rights and well-being of workers in the recycling industry.<sup>3</sup>



*Imported used clothing hanging for sale at a second-hand market in Delhi, India*

Garment companies often present the use of recycled textile content in their products as an indicator of their commitment to responsible business practices. For example, adidas qualifies an article as sustainable if 'environmentally preferred materials' exceed a predefined percentage of the article's weight. For apparel, this is at least 70 per cent of the weight. According to adidas's Annual Report: "The majority of the environmentally preferred materials currently used are recycled materials or more sustainable cotton." The company has applied this standard since 2022.<sup>4</sup>

This paper is the result of a modest inquiry undertaken by Arisa. In our inquiry, we examined whether and how globally operating fashion brands have integrated their recycling processes with their human rights due diligence (HRDD) approaches. In other words, we looked at whether brands' HRDD policies and practices take into account the labour conditions of workers involved in processing textile waste across the value chain and in producing recycled textile content for garment products.

We combined desk research with a questionnaire we sent to 20 selected fashion brands (see details below). The information we gained via the desk research and responses of the fashion brands provides an overall picture of where these companies currently stand in terms of their corporate policies and practices, and their plans and targets, relating to textile waste disposal and the use of recycled content.

In this paper, we focus on the use of recycled textile content in the selected international fashion brands' garment and textile items; where the recycled content was processed; and the extent to which the companies consider these materials – and the suppliers involved – to be part of their value chain that should fall under their HRDD responsibilities.

## Backdrop to this research

Arisa undertook this research against the backdrop of the international garment industry's growing interest in sustainability. Internationally operating companies are responsible to ensure their business practices do no harm to people or the environment, in line with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

These standards set clear expectations for companies to take proactive measures in addressing adverse impacts on human rights and the environment across their operations and supply chains. Key measures are stringent due diligence processes that involve identifying, preventing, mitigating and accounting for actual or potential impacts; engaging with affected rights-holders, such as workers and their families and communities; and providing remedies when harm occurs.

Sustainability has become a prominent topic, with an increasing number of brands and retailers focusing on sustainable practices. Customers seeking more sustainably produced clothing are turning to second-hand and vintage clothing as a preferable alternative. This interest arises from heightened awareness of the environmental damage the fashion industry causes, such as pollution and heavy water use in manufacturing garments and textile items, including in cotton farming and fabric dyeing, as well as the enormous volumes of textile waste consisting largely of garments discarded by consumers.

The fast fashion industry is a major contributor to textile waste. The huge quantities of cheap garments it produces each year persuade many consumers to buy new clothing items frequently, wear them only a few times and then replace them. The poor quality of many fast fashion items also reduces chances of such items being reused, which therefore end up as waste more quickly.

There are two broad types of waste in the garment industry: pre-consumer waste, which comprises the various types of waste generated during production, and post-consumer waste, which is mostly garments but also other textile items that people discard after use.

The industry is developing new strategies to address the growing mountain of textile waste. Some brands are integrating strategies into their business models, prioritising innovative designs and the use of recycled and recyclable materials that enable cradle-to-cradle recycling.

However, the recycling industry often operates in relative obscurity. Textile recyclers remain largely invisible, and we know very little about their operations or about the people working in this sector. Who are the workers who sort, tear apart and transform discarded textiles into fluff used for new yarns? What are their labour conditions? Ensuring garment companies commit to complete supply chain transparency remains a significant challenge. Even when companies publish supplier lists, these rarely include recycling facilities and suppliers of recycled raw materials.



Stacks of imported used jeans at a recycling facility in Panipat, India

This lack of visibility is particularly concerning given what we do know. For example, the textile recycling sectors in India and Pakistan – which process large volumes of post-consumer waste imported from Western countries alongside pre-consumer waste – are highly informal. Research Arisa has conducted in Tirupur (Tamil Nadu state) and Panipat (Haryana state) in India,<sup>5</sup> and in Faisalabad (Punjab province) and Karachi (Sindh province) in Pakistan,<sup>6</sup> shows that labour conditions are often deplorable: low wages, long working hours, no formal contracts or social benefits such as health insurance or pensions, and inadequate occupational health and safety measures.

Recycling sector workers are frequently exposed to dust, chemicals and dangerous machinery without proper protective gear. Evidence collected so far also suggests that this workforce's proportion of child and migrant labourers, who are most prone to exploitation and abuse, is alarmingly high. The sector operates with little to no governmental regulatory oversight and is entirely non-unionised, meaning that risks and violations often go unaddressed. Other investigations of the textile recycling industry in Panipat came to the same conclusions, highlighting especially the severe health issues.<sup>7</sup>

These substantial labour rights risks in the textile recycling sector have motivated us to explore how far fashion brands take such risks into account in their HRDD practices.

### **Circularity and producer responsibility**

The European Union has developed a Strategy for Sustainable and Circular Textiles as part of its stated objective to create a greener and more competitive textiles sector. This strategy addresses the entire life cycle of textiles, from production and consumption to reuse, recycling and disposal. The strategy was adopted in March 2022 and is part of the EU's broader Circular Economy Action Plan. It connects to the Waste Framework Directive and introduces mandatory and harmonised extended producer responsibility (EPR) schemes for textiles across EU member states.

Under the EU's textile circularity and EPR policies, companies are required to track and report on the collection, sorting, reuse and recycling of the textile products they place on the market. This obliges producers to have verified information on their supply chains, including recycling facilities, to assess compliance and calculate EPR fees. While the regulations do not currently mandate public disclosure of specific recycling facilities or working conditions, the introduction of digital product passports and alignment with broader sustainability reporting frameworks encourage companies to increase internal transparency and traceability throughout the product life cycle.

Corporate standards for recycled content include the Recycled Claim Standard (RCS) and the Global Recycled Standard (GRS). These standards set the criteria for third-party certification of recycled materials and the chain of custody, including a minimum recycled content percentage and environmental and social requirements related to processing and chemical use.

GRS stated objectives are reducing the harmful impact of production on people and the environment, providing assurance that products are processed in a more climate-friendly way, and encouraging higher proportions of recycled content in products. Key social GRS requirements include: clear social responsibility policies to ensure compliance with social standards; prohibition of forced labour and child labour; freedom of association and non-discrimination; safe and hygienic working conditions (e.g., access to toilets, drinking water); compliance with legal wage requirements (minimum or industry wages), overtime rules and working hour limits; and occupational health and safety protections and practices.

Third-party bodies audit compliance with these social requirements annually as part of GRS certification.<sup>8</sup>

# Arisa's inquiry: desk research and questionnaire

## Selection of corporate respondents

For this inquiry, Arisa looked into a sample of 20 fashion companies:

- **adidas**
- **ASOS**
- **BESTSELLER**
- **Debenhams Group**  
(representing Boohoo and Pretty Little Thing)
- **Decathlon**
- **Fast Retailing**  
(representing Uniqlo)
- **Gap**
- **Gymshark**
- **H&M**
- **Inditex**
- **Mango**
- **Marks & Spencer**
- **New Look**
- **Next**
- **Nike**
- **Primark**
- **Puma**
- **Shein**
- **Urban Outfitters**
- **VF Corporation**  
(representing North Face and Vans)

We selected these 20 fashion companies based on several criteria:

- ➔ **Fast fashion business model:** Companies operating in the fast fashion segment, which can be defined as a model built on low-cost production of large volumes of widely available, cheaply priced clothing with a short lifespan, emphasising rapid turnover and high disposability.
- ➔ **Target consumer group:** Companies that own brands catering to young consumers in Western European countries. The underlying assumption here is that this consumer group is the largest target group for fast fashion brands, desiring trendy clothes that are not too costly.
- ➔ **Sourcing regions:** Companies that source from India and/or Pakistan, as South Asia is Arisa's scope of work.
- ➔ **Public engagement with circularity:** Companies that make public statements about their circularity activities and/or engage in initiatives such as promoting circular services and circular design; collecting used clothing and textiles; speaking about the need for recycling in general and the recycling of polyester or cotton specifically; offering platforms for reselling pre-owned branded clothing; identifying pre-consumer waste as a distinct stream; and recycling pre-consumer waste.

## Desk research

Arisa conducted desk research for all 20 selected brands, looking at corporate publications on practices, targets and challenges related to the use of recycled content in their garment and textile items. Examples of such publicly available information are sustainability reports, other annual public reports on business activities, and specific guides and webpages on circular activities.

All brands publicly communicate their use of recycled textile materials in their fashion collections, though the proportion of such materials varies among them. Many also express strong ambitions to increase the share of recycled content in their products over the coming years.

For instance, **Inditex** states in its 2024 sustainability reporting that it aims to “make headway in the use of recycled materials, which are not dependent on the extraction of virgin raw materials and help reduce waste generation”. The company highlights collaborations with organisations such as Textile Exchange and the Organic Cotton Accelerator to advance initiatives related to lower-impact raw materials, design for recyclability, waste-processing infrastructure and the development of new textile recycling methods.<sup>9</sup> Similarly, **Mango** recently announced its partnership with The Post Fiber and launched its first collection using post-consumer recycled fibres for its Teen line.<sup>10</sup> As a result, facilities that process textile waste into recycled fibres have become part of all these brands’ supply chains.

We found that the brands publish information about pre-consumer textile waste in their supply chains in broadly four ways:

- ➔ **BESTSELLER, Decathlon, GAP, Puma, Shein and Urban Outfitters** publicly report on the recycling of pre-consumer waste and its use in their own branded products.
- ➔ **adidas, H&M, Mango, Next, Nike and Primark** make public statements about the recycling of pre-consumer textile waste generated across their supply chains but are unclear about whether this recycled waste is then reused in their own branded products.
- ➔ **ASOS, Debenhams Group, Fast Retailing, Inditex, Marks & Spencer, New Look and VF Corporation** acknowledge the existence of pre-consumer waste and make statements about potential future recycling activities, but it is unclear how they currently handle this waste stream.
- ➔ **Gymshark** does not publicly report at all on pre-consumer waste streams.

The 19 brands relate their reporting on pre-consumer waste in their supply chains, and any information they give on the recycled content in their garment and textile items, to addressing the amount of textile waste the fashion industry generates and the desirability of limiting the need for virgin material. The brands present this information as part of their sustainability strategies, framing products containing recycled material as offering consumers a more sustainable or responsible purchase. The brands link their strategies to the need to reduce the current fashion industry’s problematic environmental footprint.

There is little to no mention by the brands of respecting human and labour rights or having risk assessments in place for specific issues arising in the recycling and reuse parts of their supply chains. Only one brand, **Marks & Spencer**, explicitly mentions in its Recycled Material Sourcing Policy that due diligence steps are required concerning the origins of recycled content in its products and the need to ensure this content is ethically sourced. However, Marks & Spencer provides no definitions of what it regards as ethically sourced.

## Questionnaire

Besides desk research, Arisa developed a questionnaire covering the following topics:

1. Volumes of textile waste generated across the company’s global value chain.
2. Destination of pre- and post-consumer textile waste generated across the company’s value chain.
3. Volumes of raw and recycled materials used across the company’s value chain.
4. Origin of recycled textile materials.
5. Human rights due diligence.

Arisa sent the questionnaire to the 20 fashion companies in October 2025. Depending on the company structure, we contacted either parent companies or individual brands and retailers. For example, we sent the questionnaire to Inditex and asked it to respond on behalf of its brands, including Zara.

## Unresponsive brands

Thirteen of the companies we approached did not respond to our questions at all: **adidas, ASOS, Debenhams Group, Decathlon, Gap, Gymshark, Marks & Spencer, New Look, Primark, Puma, Shein, Urban Outfitters and VF Corporation.**

Only seven companies responded, with answers varying wildly in relevance and detail: **BESTSELLER, Fast Retailing, H&M, Inditex, Mango, Next and Nike.** Only two of the responding companies filled out the questionnaire: Fast Retailing and Mango. Mango provided additional information by email. The other five responding companies did not complete the questionnaire and responded to our inquiry only by email. They did not give a clear explanation for this, although some brands cited a lack of time and stated that the information Arisa sought could be found in their sustainability reports.

- ➔ **BESTSELLER**, for example, said: "Based on the information given below, we unfortunately do not find ourselves in a position to fill in your detailed questionnaire."
- ➔ **H&M** did not fill in the questionnaire, yet pro-actively engaged in communication regarding our request. It decided to lift out several topics from the questionnaire and provided their responses on them in a separate document.
- ➔ **Inditex** limited itself to saying: "Inditex circularity strategy and use of recycled materials related information is available at our Sustainability Report 2024."
- ➔ **Next** replied: "Thank you for sharing the questionnaire with us, waste is a critical topic and one that we are actively working on, you can read more in our Corporate Responsibility Report. We will therefore not be filling in the questionnaire."
- ➔ **Nike** said: "Thanks for the opportunity to respond. Nike is working to transform our value chain into a more circular system, lowering waste by driving continuous improvement in how we design, make and deliver products. For specific data on waste reduction efforts, we refer you to page six of our FY24 Sustainability Data Table. As an example of scaling circular solutions, we recently launched Aero-Fit, Nike's first elite performance apparel made from 100 per cent textile waste, a strong example of the brand's decades-long commitment to reducing its footprint and helping athletes adapt to the impact of climate change."



## Brand responses in more detail

For the seven brands that did respond, we describe their responses in more detail below, classified under two main topics: supply chain transparency and human rights due diligence. Since none of these brands responded to all the questions Arisa raised, not all seven brands are highlighted under both topics.

### Supply chain transparency

Recycling units and suppliers of recycled content are part of garment companies' value chains, as they process textile waste generated during production and/or provide recycled textile materials for incorporation into new garment products. These actors therefore fall within the scope of supply chain transparency disclosures.

The questionnaire included questions on supply chain transparency, asking for details of countries of origin where textile waste is generated or processed, as well as the names of actors such as buyers of waste and suppliers of recycled content.

In response, **H&M** indicated that it does not maintain direct relationships with recycling facilities in its supply chain. It was unclear if the company is aware of these facilities and of concerns arising about them. H&M did not provide concrete answers to Arisa's questions on textile waste generated across its value chain or the suppliers of recycled content used in H&M-branded products.

**Inditex** referred to its Sustainability Report 2024 for information on its circularity strategy and use of recycled materials. From the report's section E5 on 'Resource use and circular economy', we learn that, while Inditex participates in selecting raw materials and specifying their characteristics, the purchase of raw materials (including those recycled) and fabrics is not part of its operations. As a result, Inditex considers the impacts, risks and opportunities associated with resource use to be its suppliers' responsibility. The company's waste management, meanwhile, is primarily limited to waste generated within its own operations and does not extend across the broader supply chain.

In response to Arisa's inquiry, only **Mango** explicitly referred to its suppliers' list, which is public but does not feature any recycling facilities. Mango stated that it has not published information on the countries of origin of the recycled fibres it uses in its products. Instead, Mango mentioned the Retextat project, through which it incorporates post-consumer textile waste in some products. The project has established a traceable supply chain from Solidança's collection of post-consumer textiles in Spain to fabric manufacturing by Coleo in Spain and garment manufacturing by Coleo in Morocco. Mango also mentioned its work with and investments in The Post Fiber textile recycling start-up company in Sabadell, Spain.

**Next** stated that waste is a critically important topic that it is actively addressing. In addition to referencing its Corporate Responsibility Report, Next referred to the Higg Facility Environmental Module that collects waste data from facilities and supply chain mapping conducted by Reverse Resources. The company did not explain whether or how it may be involved in these initiatives and shared no information on textile recycling facilities in its supply chain.

**Nike** referred to published data on waste reduction and diversion for the 2024 fiscal year. The reported figures suggest that Nike has a fairly precise understanding of where its waste ends up and which actors are involved in waste recycling and composting. However, it did not provide to Arisa, and does not currently publish, details such as the locations and names of recycling sites.



*Piles of pre-consumer waste and imported used clothing at a recycling facility in Faisalabad, Pakistan*

## Human rights due diligence

Part of the questionnaire addressed companies' HRDD policies and practices regarding their buyers of textile waste and suppliers of recycled content. Below we describe both companies' responses to our inquiry and what we found through desk research.

With regard to due diligence, **BESTSELLER** referred to the 'Switch to Upstream Circularity' pilot in Bangladesh, part of the UN Industrial Development Organization's SWITCH to Circular Economy Value Chains (SWITCH2CE) programme (BESTSELLER, 2024). The three-year pilot, launched in 2023, aims to scale up traceable textile recycling with suppliers in Bangladesh, provide manufacturers with circular business solutions, reduce reliance on virgin materials, and thereby increase the availability of recycled textiles (Global Fashion Agenda, 2024). The pilot also refers to creating decent jobs but without providing a definition of a 'decent job'. The pilot has included training on child labour risks, responsible workforce management and policies for enhancing social compliance in recycling operations, provided by the Centre for Child Rights and Business.

As of late 2024, 37 of BESTSELLER's suppliers in Bangladesh had participated in pilot activities, including capacity building and training. Reporting key achievements up to March 2025, BESTSELLER highlights the segregation and recycling of post-industrial textile waste, engagement with numerous stakeholders, and the incorporation of recycled fibres into garments, resulting in environmental savings in CO<sub>2</sub> emissions and water and land use (Global Fashion Agenda, 2025). There are no reports of achievements in creating decent jobs or other labour and social outcomes. While the pilot aims to support a long-term, scalable transition to a circular textile system in Bangladesh and beyond, we could find no mention of whether or how it may be scaled or rolled out to other countries.

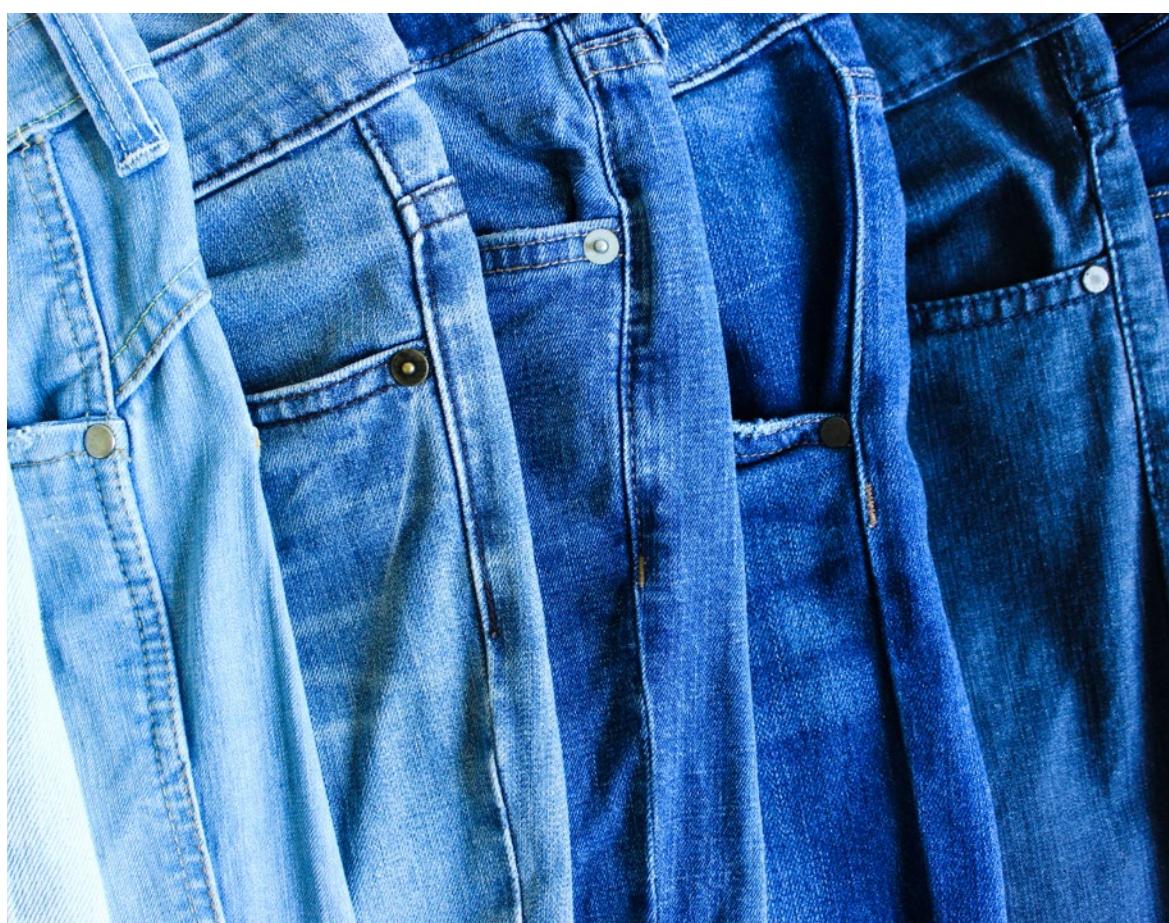
**Fast Retailing** stated that it "currently do[es] not have a publicly available policy addressing the disposal and processing of pre-consumer textile waste". The company has guidelines for developing waste management systems involving the avoidance of landfill and incineration without energy recovery. It has also initiated activities for using pre-consumer textile waste in its supply chain.

Fast Retailing indicated that it considers human rights and animal welfare in its supply chain and strives for traceability. It sources recycled materials, for example, from facilities with RCS or GRS certification.

Fast Retailing conducts unannounced third-party audits of all garment factories, core fabric mills and spinning mills producing Uniqlo cotton products to monitor working conditions and address identified risks. It publishes aggregated audit results on its website. Company staff also visit raw material suppliers to oversee labour conditions. New suppliers, including those providing recycled textile materials, must comply with the [Fast Retailing Code of Conduct for Production Partners](#), which aims to protect human rights and ensure safe workplaces. Fast Retailing states that it will not source from suppliers or sell pre-consumer waste to facilities where child labour, non-unionisation or sub-minimum wages occur.

In response to Arisa's inquiry, **H&M** highlighted its ambition to decouple business growth from resource use by promoting recycled or sustainably sourced materials, optimising production, and scaling circular business models across the value chain. The company referenced the [Ellen MacArthur Foundation's circular economy principles](#) and the [EU waste hierarchy](#), stating that it aims for zero waste to landfill. H&M requires suppliers to sign its Sustainability Commitment and provides guidelines to optimise and recirculate post-industrial or pre-consumer textile waste.

H&M also outlined its HRDD process, including a salience assessment to prioritise key human rights impacts, risk-based audits and its Sustainable Impact Partnership Programme to monitor supplier compliance. H&M explained that, although it does not maintain direct relationships with recycling units, it requires recycled materials to be certified under recognised standards such as the RCS and GRS. H&M reports having comprehensive policies and systems to promote environmental and social responsibility, although it offered in its response no details on labour conditions in recycling units or on impacts on workers.



**Mango** told Arisa that it has policies in place on the processing of pre- and post-consumer waste used as input materials for the recycled content in its textile items. The company has an environmental, social and governance (ESG) risk management framework as part of its “sub-risk ‘Circularity and Waste Management’” where circularity is integrated. This addresses “challenges in the classification and management of textile waste, regulatory limitations in recycling or destruction of materials, and problems with the collection and traceability of textile waste”. Mango said that it applies no formal due diligence process in this area. Despite a social component being an integral part of its ESG commitments, the company’s ESG risk management framework focuses almost entirely on environmental challenges and logistics.

With regard to post-industrial waste, Mango mentioned a process it initiated in 2024 “to deepen its understanding of operational flows and local dynamics in textile waste management in production countries. The company aims to understand regional regulations better [and to] identify local recyclers to promote responsible waste management.” It shared no further details on where (country, region, city) these operations may take place or which local recyclers Mango may work with. But it did list Spanish- and European-based NGOs, charities and recyclers that it works with.

Mango also stated that full traceability of recycled textile material suppliers is challenging. Many of these suppliers are engaged via the manufacturing factories, which makes it “complex to identify specific human and labour rights risks directly linked to them. It is likely that such risks are aligned with those commonly observed in the main sourcing countries of our supply chain, particularly related to wages, overtime, and health and safety conditions.” The company indicated that its human rights and compliance standards apply to all its suppliers and are therefore covered by Mango’s HRDD. There is an ‘ethical channel’ through which all Mango suppliers, including suppliers of recycled material, can anonymously report potential misconduct.

Mango’s response also indicated that it is currently establishing criteria for selecting new suppliers of recycled textile materials, including social considerations, although the primary focus is on eco-design performance. However, the company pointed out that informality of the facility, child labour, forced labour and wages below local minimum levels are reasons for it not to select a potential future supplier. It has not yet engaged in initiatives for improving working conditions in the textile recycling facilities in its supply chain.

Mango highlighted that it requests suppliers that use recycled content to hold RCS or GRS certification, for traceability and to meet its environmental and social requirements for recycled materials.

**Next** shared two peculiar insights, which it said it had gained from the Sustainable Clothing Action Plan 2020, an industry-led initiative coordinated by the Waste & Resources Action Programme (WRAP), bringing together brands, retailers, recyclers and other stakeholders to reduce the environmental impacts of clothing in the UK, including carbon, water and waste. One insight was that facilities produce for multiple brands, so any ‘waste’ cannot always be directly attributed to a single brand. Secondly, suppliers are experts in operating their businesses effectively and efficiently; hence there is very little waste, as waste would equal lost money.

## Reflections and conclusions

The response rate to our inquiry was disappointingly low. Of the 20 brands contacted, only seven replied, and just two, **Fast Retailing** (Uniqlo) and **Mango**, completed the questionnaire. The other five responding companies provided only partial or random pieces of information. Consequently, this report relies to a considerable extent on publicly available sources. However, the companies' sustainability reports and similar documents and online statements remain largely inconclusive on the specific issues we investigated in this inquiry.

The data we received and gathered were insufficient to draw robust conclusions about the quantities of raw and recycled materials these brands use in their global value chains. Nor could we draw authoritative conclusions about the volumes of pre- and post-consumer textile waste generated. The brands were similarly untransparent about the origins of recycled materials and the destinations of pre- and post-consumer textile waste in their supply chains.

Suppliers of recycled textile inputs and recycling facilities are largely absent from published supplier lists and cannot be identified from the reported information. As a result, it is difficult, if not impossible, to determine which facilities are involved in the production and waste handling processes of the brands our inquiry covers.

This lack of publicly available supply chain information is a significant finding in itself. These brands fail to provide transparency in a critical part of their value chains. This observation aligns with Fashion Revolution's What Fuels Fashion? 2025 report, which found that 91 per cent of major fashion brands do not disclose their annual production volumes.<sup>11</sup>

Given the lack of transparency regarding production volumes and waste streams, we conclude that the 20 brands in our sample fall short of basic supply chain transparency standards. The limited information regarding textile recycling the companies present on their websites appears only in relation to environmental gains and as a solution to waste issues in the fashion industry.

On the central topic of this inquiry, human rights due diligence, none of the companies provided concrete information about labour conditions, rights violations or related risks among their suppliers of recycled content and waste processors in their supply chains. This is concerning, as brands have a responsibility to ensure respect for human and labour rights in these facilities, as the UN Guiding Principles and the OECD Guidelines for Multinational Enterprises stipulate.

Among the 20 brands, only **BESTSELLER**, **Fast Retailing** and **Mango** explicitly stated that their HRDD programmes should cover recycling facilities and suppliers of recycled textile inputs. Inditex, by contrast, claimed responsibility only for waste handling within its own operations, distancing itself from impacts occurring in its wider supply chain.

**Mango** acknowledged that recycling facilities form part of its supply chain and recognised the likelihood of rights risks, such as low wages, excessive overtime and unsafe working conditions, particularly in central sourcing countries. However, it provided no concrete findings, citing the complexity of identifying human and labour rights risks directly linked to recycled textile material suppliers in its supply chain, as these suppliers are often engaged via the manufacturing factories.

**Mango** also highlighted several small-scale recycling projects, primarily based in Spain, as part of its circularity efforts. While these initiatives are noteworthy, they fall outside the scope of Arisa's inquiry, as they do not engage with the situation of waste workers in low-income countries such as India and Pakistan. The company also did not clarify whether these projects could be scaled up or replicated in other contexts.

**Fast Retailing, H&M and Mango** referred to RCS and GRS certification, to demonstrate that they take responsible steps in handling textile waste. These certifications are recognised standards with clearly articulated objectives; however, they do not prioritise social objectives. Moreover, decades of credible research have shown that commercial third-party audits conducted to obtain such certification are generally insufficient to identify social issues in supply chains.

Mainstream social audits often provide only a superficial and prearranged snapshot of working conditions, missing serious labour abuses. Many auditors lack the necessary expertise to identify complex violations, and conflicts of interest arise because auditors are hired by the companies they inspect. Limited and management-observed worker interviews, minimal off-site worker engagement, and poor follow-up on corrective actions also mean that many abuses remain unnoticed and unremedied.<sup>12</sup>

Arisa's 2025 study of textile recycling in India illustrates this weakness: at a GRS-certified spinning facility producing recycled yarn, researchers documented serious labour rights violations.<sup>13</sup> Most workers were unregistered and lacked proof of employment. They worked up to 12 hours a day for seven days a week, in a noisy, hot and dust-filled environment with minimal ventilation and no protective equipment, exposing them to serious health risks. This example underscores the inadequacy of certification-based assurance mechanisms in addressing human rights risks and violations in supply chains.

**Next** deflected responsibility for textile waste management by arguing that waste cannot always be traced to a single brand due to shared suppliers. Rather than promoting joint accountability, this reasoning reveals a lack of interest in effective collective oversight. **Next** also claimed dismissively and inadequately that manufacturers operate efficiently and waste little valuable textile material. But the fashion industry produces substantial pre-consumer waste, and there is little evidence in terms of data on material input and waste volumes to support claims of efficiency. Most importantly, **Next**'s reply ignores Arisa's main concern: the labour conditions of textile waste workers.

Overall, the poor quantitative and qualitative response from garment companies suggests low levels of awareness of, and limited interest in, labour conditions and labour rights in the textile recycling sector. Brands continue to view recycling, circularity and waste management primarily through an environmental lens and neglect the important human rights angle.

Diverting textile waste from landfill and incineration is commendable, but such actions do not constitute responsible business conduct while overproduction persists and the rights of recycling workers remain unprotected. Without transparency about the conditions under which recycled materials are produced, claims that garments containing recycled content are 'responsible' or 'sustainable' amount to mere greenwashing.

Hence our recommendations to the industry and our call to young consumers.

## Recommendations to the global garment industry

These recommendations apply to both the industry as a whole and to each company and brand.

-  The fast fashion model should be abandoned. A substantial reduction in global clothing production is essential to achieve sustainability. As long as the industry continues to produce – and even to expand – current volumes of garments, textile waste disposal policies will remain ineffective.
-  Garments should be produced with higher quality and greater durability to extend their lifespan and significantly reduce waste and overconsumption.
-  Clothing should be designed for circularity, maximising recyclability and enabling reuse of materials.
-  The industry should adopt common terminology and metrics for textile waste to enable transparency, comparability and accountability across the sector.
-  Companies should take full responsibility for their entire value chains, including textile waste collectors, sorters, recyclers and suppliers of recycled textile materials.
-  Companies should publicly disclose all textile recycling facilities and providers of recycled textile inputs in their value chains. At a minimum, disclosure should meet Open Supply Hub standards, detailing for each enterprise its name, parent company, address, geolocation, sector, facility type, production processes, product types and number of workers employed.
-  Human rights due diligence programmes should be expanded to include textile recycling facilities.
-  Companies using and promoting recycled textile content in their clothing and textile items should be fully aware of the human and labour rights risks in the textile recycling industries in countries like India and Pakistan, know about their supply chains, including textile recycling facilities, and include them in their human rights due diligence practices.
-  Companies should ensure meaningful engagement with stakeholders and rights-holders in their recycled content supply chains to identify, prevent and address human rights risks and occurring harms.

## Call to young consumers

-  Be a critical consumer – care about the environment and about human rights.
-  Buy less.
-  Don't buy fast fashion, buy slow fashion
-  Buy durable materials and products.
-  Buy second-hand and vintage and/or swap.
-  Repair and upgrade – be creative.
-  Recycle your end-of-life garments via appropriate channels.

## Notes

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**Blind spots in textile recycling:  
Fashion's sustainability claims overlook workers' rights**

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**About Arisa**

Arisa – Advocating Rights in South Asia – works to improve respect for human rights and labour rights in global supply chains. Working with civil society partners in India, Bangladesh and Pakistan, among other countries, we expose human rights and labour abuses in the production of garments, leather, natural stone and vegetable seeds, and we call on companies and governments to ensure that rights are respected. We prioritise the position of the people in the most vulnerable situations in global supply chains and work to eliminate child labour, forced labour and caste discrimination. Arisa is member of the Clean Clothes Campaign.

For more information, see [www.arisa.nl](http://www.arisa.nl)

The inquiry presented in this publication, developed as part of Clean Clothes Campaign's Fashioning a Just Transition (2024-2027) project, covers 20 fast fashion brands. While this is arguably a modest sample, we believe that the reflections and conclusions drawn are indicative of the situation and prevailing practice across the broader fashion industry.

This paper is the fourth publication in Arisa's series on textile recycling under the Fashioning a Just Transition project. The other papers in the series are "[The fast fashion waste mountain](#)", "[The human cost of textile recycling: case study India](#)" and "[The human cost of textile recycling: case study Pakistan](#)".



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