



Federation of the European
Sporting Goods Industry

FESI Position Paper

**On the Draft
delegated regulation
on green-listing certain
waste shipments for
recovery**

September 2026

Summary:

1. **What we support:** Textile waste inclusion
2. **Outstanding issues:** full green-listing of footwear
3. **Recommended actions**

Introduction

The Federation of the European Sporting Goods Industry (FESI) strongly supports the Commission's objective of facilitating intra-EU shipments of textile and footwear waste for sorting and recycling. The proposal represents an important step forward. However, some adjustments are still needed to ensure that the framework works for footwear in practice. To that end, we respectfully submit the following key concerns and input.

1. WHAT WE SUPPORT: Green-listing textile waste

- We welcome the proposed green-listing of **B3030 textile waste mixed with footwear, hats, belts and other accessories**. This recognises the growing need to ship textile waste for recycling operations.

2. OUTSTANDING ISSUES: Full green-listing of footwear

- **Footwear has not been green-listed as a standalone waste stream.** While we support the proposal including footwear among mixed B3030 textile waste, the current wording does not green-list shipments consisting predominantly or entirely of footwear.
- **Textiles and footwear also require differentiated treatment and contamination thresholds,** particularly for unprocessed post-consumer material being shipped to specialised sorting and preparation facilities.

3. RECOMMENDED ACTIONS

- **Establish a standalone green-list route for non-hazardous footwear waste** to qualified facilities that would ensure its correct treatment, including through a dedicated Annex IIIB entry under the WSR if necessary.
- **Develop different contamination thresholds for textile and footwear** to ensure recyclers receive high-quality material.
 - **For textiles,** the contamination threshold should be above 5% to account for inherent non-textile components such as buttons, zips and labels.
 - **For footwear,** inherent non-textile components such as outsoles and insoles, rubber, foam and other polymers should not automatically be treated as “contamination”. Instead, any footwear-specific criteria should distinguish between non-textile footwear-derived materials and foreign contamination originating outside the footwear waste stream.
Given the significant variation in footwear composition, any quantitative limit on non-textile footwear-derived material should be based on representative industry data and demonstrated compatibility with environmentally sound recovery processes.

In addition, non-textile components of footwear waste (e.g. rubber, Ethylene-Vinyl Acetat, Thermoplastic Polyurethane) can serve as secondary raw materials for use in other industrial sectors. We therefore recommend the Commission to consider, in future reviews, extending green-listing provisions to these footwear fractions where they are destined for environmentally sound recovery and recycling operations. This would be in line with the objective of facilitating the efficient movement of recyclable materials and support circular economy value chains.

Conclusion

The Commission's proposal to green-list textile waste shipments is an important step forward, but **footwear also needs a workable green-list route in its own right**. A standalone classification reflecting footwear's inherently multi-material composition would provide greater legal certainty, facilitate intra-EU recycling, and ensure that footwear can fully benefit from the green-list regime.

Founded in 1960 FESI - the Federation of the European Sporting Goods Industry represents the interests of approximately 1.800 sporting goods manufacturers (85% of the European market) through its National member Sporting Goods Industry Federations and its directly affiliated companies. 70-75% of FESI's membership is made up of Small and Medium Sized Enterprises. In total, the European Sporting Goods Industry employs over 700.000 EU citizens and has an annual turnover of some 81 billion euro.

FESI – Federation of the European Sporting Goods Industry

✉ Rue Marie de Bourgogne 52, B-1000 Brussels

☎ +32 (0)2 762 86 48

✉ info@fesi-sport.org

🌐 www.fesi-sport.org

