



23 April 2021

New York City Council  
Committee on Contracts  
In re: File # Int 2272-2021

To Whom It May Concern:

Accelerating Circularity, Inc. is a collaborative initiative developed to accelerate the textile industry's move from linear to circular. Our mission is to establish systems that will use the embedded value and resources in existing textiles for new products, reducing the millions of tons of textile waste annually going into landfills and thereby supporting the reduction of the industry's greenhouse gas emissions. We submit the following testimony regarding Int. No. 2272 in support of robust public policy initiatives that aim to divert textile from landfill and incineration.

**General comments on Int. No 2272:**

It is confusing to use the word "textile" when "fiber" is intended. These terms should be clearly defined and used consistently throughout.

"Recycled" is used too broadly to be useful. Please see comments in re: pp. 2 lines 8-9 for more detail.

It should be clarified throughout that third party certification is a *requirement* to demonstrate the desired sustainability attributes.

Goals such as "net zero" should be achieved within a specified time frame.

Where criteria or considerations are listed, the order of priority or weight should be articulated in every case.

**Specific comments by page number and line reference:**

1(18)

Existing text: The textiles found in the textile good;

Proposed revision: The fiber content, trims, finishing chemistries, films, and/or coatings of the textile good;

2(4)

". . . if traceable . . ."



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Comments: It would be helpful to understand more clearly the goal of this disclosure and reporting. The textile supply chain currently does not have this level of traceability outside the context of certain third-party certification systems. The phrase, “if traceable,” is therefore a significant loophole that essentially nullifies the requirement. Understanding the goals of this requirement will clarify the best way to make it more meaningful and robust.

2(8-9)

“Recycling” requires definition. In the textile industry today, the word “recycling” is used to refer to a variety of disposition channels, including but not limited to:

- a. Re-working or re-making a finished good (“upcycling”)
- b. Downcycling to wipers/rag
- c. Downcycling to shoddy
- d. Textile-to-textile recycling (re-fiberizing spent textiles for new finished good manufacturing)

It is unclear from the current text whether the City’s definition of “recycling” also implicitly includes reuse/resale. We posit that these disposition channels have very different values and impacts and should therefore not be classified together as though they are equivalent. The Textile Use Case Hierarchy<sup>1</sup> provides guidance for the prioritization of spent textile disposition, from most to least preferred:

1. Domestic reuse/resale
2. Repair
3. International reuse/resale
4. Textile-to-textile recycling – mechanical
5. Textile-to-textile recycling – chemical
6. Domestic wiper/rag
7. International wiper/rag
8. Shoddy

Landfill and incineration should be avoided.

The City should also address how spent textiles are to be collected. Will the City organize take back/collection at its facilities? How will this be rolled out at the agency and individual level? If this falls under the purview of the task force, it should be explicitly articulated in its responsibilities.

2(10)

“biodegradable”

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<sup>1</sup> Accelerating Circularity, Inc. (2021, March). *Modeling and Linking Report*.  
<https://www.acceleratingcircularity.org/research>



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The City should specify what definition or measure of biodegradability it will adopt and enumerate what third-party standards and assurance are acceptable to demonstrate this. If this determination is one of the task force's deliverables, that should be explicitly articulated.

2(15-17)

This is an example of the elision of "textile" and "fiber" noted in the general comments.

3(8)

Existing: "examples of textiles found in textile goods"

Proposed change: "examples of fibers found in textile goods"

3(8-11)

Elastane should be included in this list. It is a critical fiber, whose inclusion in finished goods is both ubiquitous and directly impacts the disposition pathways available.

3(13)

Existing: "virgin textile"

Proposed change: "virgin fiber"

3(14-21)

Although certification standards are referenced, it is not clear from the wording that third-party certification or verification of the attributes mentioned (recycled, organic, biodegradable, animal content, etc.) is *required*. This should be an explicit requirement.

Replace instances of "textile" with "fiber" when "fiber" is meant.

3(22)

Country of origin should be made explicit.

4(17)

include chemicals

5(1-3)

Revise to read (changes **bold**), "To eliminate the use of and exposure to hazardous substances, including bioaccumulative and toxic chemicals found in textiles **through the implementation of a Restricted Substance List (RSL)**, including **but not limited to** chromium, formaldehyde, and PVC."

5(4-5)

Needs to include a timeline.



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5(22)

revise to read (changes in **bold**), “. . . innovative production methods **and end of life solutions for** textiles . . .”

6(4)

How is “agency needs” defined? What are the performance criteria? Is this up to the task force or each agency to define? Clearly articulate responsibilities and deliverables on these criteria.

6(4) – 7(13)

Are these listed in order of priority? Needs clarification.

7(14) – 8(8)

The list of standards to consider should include the Recycled Claim Standard (RCS).

10(8) – 10(15)

Suggested addition:

“No such person shall be a representative of a trade group in the textile goods industry.”

Accelerating Circularity has a robust network of expert stakeholders throughout the textile industry and therefore can provide additional feedback as needed.

Respectfully submitted,

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Accelerating Circularity, Inc.