

The Western Development Commission's Submission to the Stakeholder Consultation on the Extended Producer Responsibility Scheme for Textiles Delivery Plan October 2026 to April 2028

Introduction

The Western Development Commission (WDC) is a statutory body with a remit to promote and encourage economic and social development in the Western Region (counties Donegal, Sligo, Leitrim, Mayo, Galway, Roscommon, and Clare). The WDC operates under the aegis of the Department of Rural and Community Development and the Gaeltacht. The WDC welcomes the opportunity to submit its views to the Stakeholder Consultation on the Extended Producer Responsibility Scheme for Textiles Delivery Plan October 2026 to April 2028.

The WDC believes that a regional, circular approach is critical for achieving Ireland's national social and economic objectives. Our response is provided in the context of the regional development factors that are relevant to the successful design of a Textiles EPR Delivery Plan. It draws on the WDC's experience in textile-reuse project development and our circular economy expertise, to the benefit of the region, while supporting SMEs, micro-enterprises, social enterprises, circular economy enterprises, and communities.

Our vision is to develop the West as a social innovation region with global links and recognition. We work to support an ecosystem that addresses societal needs by combining emerging technologies, social innovation, communities, entrepreneurs, and investment. For example, through our Western Investment Fund (WIF), since 2001, WDC has provided more than €100 million through investments and loans across 373 SMEs, social enterprises, community projects and strategic initiatives.¹ The WDC has also played a significant role in developing strategic direction and policy priorities in Balanced Regional Development.²

The WDC also plays a significant role in developing projects that deliver regional and all-island social and economic impacts, including two recent Interreg NPA projects that focus on textile reuse and recycling, THREADS³ and CIRCNETS⁴. Additionally, as a key partner in the €2.8

¹ Details of the Western Investment Fund's social and economic impacts are available in the 2026 report: [Western-Investment-Fund-Innovation-and-Impact.pdf](#)

² [Balanced Regional Development - Western Development Commission](#)

³ [THREADS - Western Development Commission](#)

⁴ [Blue Circular Nets \(CIRCNETS\) - Western Development Commission](#)



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million national New Solutions Social Innovation Hub, the WDC is committed to developing a strong social enterprise ecosystem in the Western Region while contributing to national impact.⁵

Regional and national contexts

The Western regional economy has faced persistent challenges. WDC contributed to the Organisation for Economic Co-operation and Development (OECD) Policy Paper (2025), *The Circular Economy in the Western Region, Ireland*, which reported that the Western Regional economy has grown more slowly than the national economy. As of 2022, the region's GDP accounted for 5% of the national GDP. The Western Region's GDP per capita is 42% below the national average of 182%, noting that Ireland achieved the second highest GDP per capita in the EU in 2022 (Eurostat, 2024).⁶

The WDC's *Western Region Analysis* (2022) showed that economically, the Northern and Western Region has a high unemployment rate at 58.8% (2022) and low levels of disposable income. Our analysis showed that the Western Region is heavily dependent on micro-enterprises (businesses employing 10 or fewer people), which represent 93% of all businesses in the region.⁷

In the national rural context, *Our Rural Future, Rural Development Policy 2021-2025* identified that Ireland's rural regions face ageing populations, with an outward migration of its younger population and high levels of youth unemployment. Populations continue to grow in rural communities, which creates challenges around connectivity, infrastructure and service provision.⁸

Why the Textiles EPR Delivery Plan needs a regional, circular approach

The WDC believes that prioritising a regional, circular approach to textile reuse mechanisms is needed for the Textiles EPR Plan to successfully support all of Ireland in reaching its waste reduction and climate goals. The programme has an opportunity to deliver not only environmental goals, but also social and economic benefits for Ireland's rural populations.

The WDC is concerned that the implementation of the Textiles EPR Delivery Plan, as currently proposed, will place the Western Region at a national disadvantage, environmentally, socially, and economically. The WDC believes that a successful plan should incorporate targeted supports and skills development to enable textile producers in rural regions to develop whole

⁵ [New Solutions Social Innovation Hub](#)

⁶ OECD (2025), "The Circular Economy in the Western Region, Ireland", *OECD Regional Development Papers*, No. 125, OECD Publishing, Paris, <https://doi.org/10.1787/3347dd9b-en>.

⁷ [Western Region Analysis - Western Development Commission](#), drawing on *CSO Business Demography 2021*.

⁸ <https://assets.gov.ie/128716/e7d34436-6e0a-4bb0-a7b1-230165357529.pdf>



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lifecycle textile processes. The OECD Policy Paper (2025) reported that circular economy activity in the Western Region remains excessively centred on waste management and recycling. While these activities are important, the OECD argues that prioritising a full circular economy model is needed across the entire lifecycle of products, with a greater emphasis on lifestyle thinking, including prevention, recovery, reuse, repair, and remanufacturing.⁹ OECD also reports low recycling rates in the region, and significant volumes of waste continue to enter waste streams. This issue is exacerbated within the region owing to “insufficient links to the circular economy or waste management at the local level.”¹⁰

The WDC also highlights the need to provide rural regions with sufficient access to innovations, infrastructure and mechanisms that are necessary to comply with the management and reduction of textile waste, particularly as the Western Region lacks accessible textile collection, sorting, and recycling infrastructure for downstream textile waste. The Western Region in particular faces barriers to regional access to innovation initiatives: the majority are national in focus, with minimal implementation in the Western Region.¹¹ The OECD (2025) argues that “the region needs circular-focused innovation, such as developing new recycling technologies and business models that enable product life extension” and highlights the absence of circular skills, such as life-cycle assessment, as a key innovation barrier. The WDC believes that these barriers may hinder the region’s ability to complete in a growing circular market. A successful Textiles EPR Delivery Plan must account for regional needs prior to implementation.

While these challenges highlight the need for a regionally sensitive approach to implementation, they also raise questions about how circular economy targets are designed and applied. The WDC considers that regional circumstances should be reflected in the development of targets to ensure that the benefits and obligations of the Textiles EPR Delivery Plan are distributed fairly across Ireland.

Regional target-setting and stakeholder engagement

The WDC believes that regionally tailored circular economy targets are needed. The OECD Policy Paper (2025) highlighted that national targets are uniformly applied across Ireland, without consideration for substantial regional variances in geography, population density, infrastructure, and economic makeup. The OECD further argues that national targets should reflect local circumstances and opportunities.¹² Indeed, the Textile EPR Delivery Plan proposes “Equal Treatment of Producers” of waste, “regardless of their origin or size”.

⁹ OECD (2025), “The Circular Economy in the Western Region, Ireland”, *OECD Regional Development Papers*, No. 125, OECD Publishing, Paris, <https://doi.org/10.1787/3347dd9b-en>.

¹⁰ IBID.

¹¹ IBID.

¹² IBID.



The WDC is concerned that without consideration and planning for Ireland's regional and rural contexts, this proposed equal treatment risks placing a disproportionate burden on rural Irish textile producers. A tailored plan that acknowledges the varied regional needs and challenges, and provides appropriately targeted mechanisms for scaling, is necessary to ensure that rural regions are equally prepared to meet EPR targets.

Furthermore, WDC believes that, in order for the plan to accurately include the Western Regional economy, it is essential to include representation from rural micro-enterprises and social enterprises in developing regional, circular frameworks.

Micro-enterprises represent 93% of the businesses in the Western Region¹³ and rural social enterprises that focus on local development and community infrastructure represent 22.8% of rural social enterprises (vs 11.8% in urban areas).¹⁴ To illustrate the importance of the social enterprise cohort to the Western Region, WDC's Social Enterprise Policy Submission 2023-2024, drawing on *Social Enterprises in Ireland: A Baseline Data Collection Exercise* (DRCD, 2023), reported that the Western Region has one of the highest concentrations of social enterprises in Ireland. Nearly all western counties exceed the rural average of 10.5 social enterprises per 10,000 inhabitants: Leitrim (26.2), Donegal (18.5), Mayo (16.5), Roscommon (14.7), Sligo (14.2), and Clare (10.6) and Galway (9.2).¹⁵

Regional targets should be informed by, and agreed in consultation with, regional circular economy businesses, charities, social enterprises, micro-enterprises, and community groups prior to national implementation. Regional target-setting should be undertaken prior to 17 April 2029, which is the additional time allowed for micro-enterprises to prepare for compliance.

A regionally balanced approach to registration fees

The WDC welcomes the Draft Plan's proposal to introduce eco-modulated fees to "incentivise producers to place more sustainable products on the market and encourage eco-design", through the eco-modulation (reduction) of fees. By incorporating progress milestones towards circular adoption into the fee structure, the EPR programme could support small and rural businesses to successfully adapt.

For example, eco-modulated fee reductions might include the completion of skills development programmes, evidence of adapting to a circular approach where possible, and participating in capacity-building activities. Rewarding meaningful, measurable actions towards EPR compliance with reduced fees would support rural SMEs and micro-enterprises to scale competitively and sustainably.

¹³ [Western Region Analysis - Western Development Commission](#), drawing on *CSO Business Demography 2021*.

¹⁴ [WDC-Social-Enterprise-Policy-submission-23-24.pdf](#)

¹⁵ [IBID.](#)



However, the WDC believes that producer fees should solely be used to contribute appropriately to the reasonable and necessary costs in preparation for reuse where these activities are undertaken as part of the EPR system. Producers should not be required to bear the cost of EPR service delivery through their income.

The Producer Responsibility Organisation as a business incentivisation, support, and advocacy body

It will be critical that the Producer Responsibility Organisation (PRO) includes mandatory representation from circular economy and reuse social enterprises, micro-enterprises, charities, community groups, and SMEs to inform EPR delivery. With the appropriate representation from these main actors in the sector, PRO, as a centralised body, will become well placed to advocate for producers.

A programme of investment in regional infrastructure and skills is crucial to support communities and businesses in Ireland, and particularly in rural regions. PRO would be positioned to maximise learning from these programmes in order to advocate for future targeted investment.

The PRO should draw on stakeholder experience to advocate for key areas of investment, and to maximise producers' access to programmes such as LeanPlus Programme, The Green Enterprise Fund, Green for Business Programme, IDA Capital Grant for Decarbonisation, and Community Climate Action Programme, amongst others. WDC believes that PRO should draw on learning from 27 environmentally focused grants provided by bodies such as IDA, EPA, LEOs, SEAI, Údarás na Gaeltachta, and InterTrade Ireland, of which OECD (2026) identified 44% are designed for SMEs.¹⁶

The PRO should also regularly collaborate with the existing bodies across Ireland such as universities, LEOs, and NGOs to help businesses and communities to develop the necessary skills, capabilities, capacity, and understanding; and to adapt their existing models towards improved waste prevention, reduction, reuse and prevention approaches.

Conclusion

Centering the regional circular economy in Ireland's economic innovation activities and ensuring that circular transition is implemented at national, regional and local levels is crucial to building on progress in this area. Incorporating key focus areas and sectors is important for developing our circular economy, including those which build on previous and existing strategies and policy direction.

¹⁶ OECD (2026), *Developing a Responsible Business Compass for Ireland*, OECD Publishing, Paris, <https://doi.org/10.1787/20fcc34e-en>.





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Given the nature of our work, the WDC is best placed to provide insights which link with supporting balanced regional development, which we believe is a critical lens for developing and embedding circular lifespan processes for textiles in Ireland, and for supporting the circular economy transition more broadly. We are committed to supporting circularity for businesses, economies and communities across Ireland. If there are any queries about the responses included in this submission, please get in touch.

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