

Mapping the ecosystem of the textile waste value chain in Viet Nam for the transition to closed-loop textile-to-textile recycling







in cooperation with:

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Preface

As the world's third-largest apparel exporter and second-largest footwear exporter, Viet Nam is uniquely positioned to thrive in textile circularity. By adopting sustainable practices, the country can drive economic growth and ensure decent work for its workforce.

Key export markets are implementing policies that enforce circular product requirements. Multinational apparel brands and retailers are also aiming to increase the use of recycled content in their products. The European Union's Strategy for Sustainable and Circular Textiles, published in 2022, along with the Corporate Sustainability Due Diligence Directive and the Eco-design for Sustainable Products Regulation adopted in 2024, introduce new mandates.

This study brings together insights from key stakeholders in Viet Nam's textile and apparel industry, including manufacturers and waste facilities, to address the shift towards textile circularity. By examining data and practices from these primary actors, the study highlights the significant influence of brands in driving sustainable transformations. The goal is to inform relevant private sector entities and other stakeholders about ongoing changes, fostering collaboration and informed decision-making in the pursuit of a circular textile economy.

Conducted as part of the global "Go Circular" programme - commissioned by the German Federal Ministry for Economic Cooperation and Development (BMZ) and implemented by the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH, in partnership with Viet Nam's Ministry of Planning and Investment (MPI) - this study aims to provide a comprehensive understanding of the current landscape and opportunities for advancing textile circularity in Viet Nam.



Viet Nam's textile and apparel industry generates **approximately 250,000 tonnes** of pre-consumer textile waste annually, excluding contributions from footwear and domestic production. Currently, about **60%** of this waste is sorted, pre-processed and then recycled via basic mechanical and thermo-mechanical processes. It constitutes predominantly 'downcycling' into lower-quality products. The remaining **40%** is directed to waste-to-energy facilities or other disposal methods. Emerging advanced recycling technologies such as chemical recycling present a promising solution for the harder to recycle textile waste.

Risks

The current waste management practices present several challenges:

- **Inefficient Waste Management at Source:** While sorting at source has commenced, there is significant potential to enhance these practices at manufacturer further to enable effective textile-to-textile (T2T) recycling.
- Fragmented Recycling Ecosystem: Viet Nam's textile recycling sector comprises over 200 waste facilities, including collectors, aggregators, pre-processors, and recyclers. This network is highly fragmented and lacks transparency, complicating waste traceability and due diligence processes.
- **Occupational Hazards:** Waste facilities frequently face compliance issues, with noticeable health and safety concerns.

Despite these challenges, there are substantial opportunities to position Viet Nam as global hub for textile circularity. Enhancing the domestic waste sector and adapting advanced recycling technologies are crucial steps forward.

Call to Action

To capitalise on these opportunities and mitigate associated risks, the following actions are essential:

- 1. Enhance Waste Management Practices at Scale and Speed: Manufacturers, aligned with brands' circularity target, should start sorting textile waste at source and adapt their contracts with waste management companies.
- 2. Foster Transparency, Compliance, and Optimisation in the Waste Sector: The waste sector must evolve to function as an integral part of the textile supply chain, often referred to as Tier 3.5. This transformation involves traceability systems, ensuring compliance, and optimising operations to provide consistent, high-quality feedstock for recycling processes.
- 3. **Enable Investment Opportunities:** The government should support investments in advancing the recycling infrastructure in Viet Nam while also developing a clear regulatory framework. International recyclers should seek cooperation with local recyclers to benefit from local knowhow and ensure a smooth transition to textile-to-textile recycling.
- 4. **Strengthen Brand Leadership:** Global brands should leverage their market influence to guide and accelerate improvements in waste management practices and recycling investments across the supply chain, as well as contribute to the associated costs.
- 5. **Promote Collective Action:** The government, sector associations and international cooperation organisations should foster collaboration among all stakeholders and competitors in the value chain to drive systemic change at scale and speed, in line with the waste hierarchy principle.

By addressing these areas, Viet Nam can transform its textile waste management landscape, reduce environmental impact, and position itself as a leader in sustainable textile production.

Glossary

Circular economy	The circular economy is a model of production and consumption, which involves sharing, leasing, reusing, repairing, refurbishing and recycling existing materials and products as long as possible. In this way, the life cycle of products is extended. In practice, it implies reducing waste to a minimum. When a product reaches the end of its life, its materials are kept within the economy wherever possible thanks to recycling. These can be productively used again and again, thereby creating further value. <i>Source:</i> <u>Circular economy: definition, importance and benefits News European Parliament (europa.eu)</u> Circular economy is an economic model which encompasses the design, production, consumption and services activities aimed at reducing raw materials, extending product life, reducing waste generation and minimising adverse impacts on the environment. <i>Source:</i> Article 142, Section 1. Law on Environment Protection (2020). Viet Nam.
Downcycling	A form of recycling in which discarded textiles are reprocessed to create new consumer or industrial products. Discarded textiles are no longer in their original form, and new products do not re-enter the textile supply chain (open loop). Most recycled industrial nutrients (materials) lose viability or value in the process of recycling, which means they can only be used in a degraded form for components other than their original use.
Upcycling	The process of converting an industrial nutrient (material) into something of similar or greater value, in its second life. Aluminium and glass, for example, can usually be upcycled into the same quality of aluminium and glass as the original products.
Pre-consumer material/waste	Material diverted from the waste stream during the manufacturing process, determined as the percentage of material, by weight. The designation excludes rework, regrind, or scrap materials capable of being reclaimed within the same process that generated them (ISO 14021). Also known as 'post-industrial material'.
Post-consumer material/waste	Material generated by households or by commercial, industrial and institutional facilities in their role as end-users of the product which can no longer be used for its intended purpose. This includes returns of material from the distribution chain (ISO 14021).
Mechanical recycling (synthetic fibres)	Mechanical recycling (of plastics) is the recovery of materials from waste while maintaining the polymers' molecular structure. In principle all types of (thermo-) plastics can be mechanically recycled with little or no quality impairment. Mechanical recycling of pure thermoplastic textile waste involves pre-processing, melting and extrusion into new fibres, while 'purely mechanical' recycling of cotton-rich and blended textile waste involves only mechanical actions, such as cutting, shredding and spinning, in recycling.

Chemical recycling	Chemical recycling (feedstock recycling) refers to operations that aim to chemically degrade the collected plastics waste into its monomers or other basic chemicals. The output may be reused for polymerisation into new plastics to produce other chemicals or as an alternative fuel.
Closed-loop recycling	Closed-loop recycling is a production process where waste (pre-consumer and post-consumer) is recycled into new materials and products. Ideally, a zero-waste supply chain that completely reuses, recycles, or composts all materials. However, the term can also be used to refer to corporate take-back programs, where companies that produce a good are also responsible for its disposal. Textile-to-textile (in some cases known as 'fibre-to-fibre') recycling is a model of closed-loop recycling that brings textile waste back into new textile materials and products.
Global Recycled Standard (GRS)	The Global Recycled Standard (GRS) tracks recycled materials through the supply chain. The standard applies to the full supply chain and addresses traceability, environmental principles, social requirements, chemical restrictions, and labelling. Developed with the textile industry in mind, the GRS may also be applied to products from any industry. See also <u>Recycled Content</u> <u>Standard (RCS)</u> and <u>Content Claim Standard (CCS)</u> .
Feedstock	A raw material that supplies or fuels an industrial process.



The study at a glance

Objective: This study aims to create a solid understanding of the textile waste recycling ecosystem in Viet Nam from waste generation at the manufacturers to waste handlers and recyclers and finally feed-in options at the various recyclers. In addition, it attempts to identify opportunities for improving the value chain processes and technologies to close the loop for pre-consumer textile waste.

Key research questions:

- What are the volumes of pre-consumer textile waste generated in Viet Nam?
- Who are the key actors in the value chain for handling preconsumer textile waste generated by textile, apparel and footwear (including waste handlers, pre-processors, and recyclers)?
- What are the current collecting and recycling pathways and output applications? What is the potential of textile-to-textile (T2T) recycling looping textile waste back into the supply chain for producing new textiles and apparels?
- What is the status and main risks related to compliance with labour and environmental conditions at collection and recycling units in the waste value chain?

Scope:

- The study focuses on the textile waste value chain in Viet Nam, particularly pre-consumer (or post-industrial) textile waste. "Textile" thereby includes yarn, fibres, fabric, apparel, and footwear products.
- The study provides estimates on the volume of pre-consumer textile waste on an aggregate level. It does not provide data on the availability of specific textile waste materials as feedstock for specific recycling technologies for commercial use.
- The study gives a general overview of textile recycling technologies currently applied in Viet Nam without providing an in-depth technology analysis.
- The study does not include a review of the regulations and policies concerning textile waste in Viet Nam.

Methodology:

- This study used a **mixed-method approach** including desk research, data analysis, site visits, interviews, expert consultations and risk assessments.
- Data and insights were gathered throughout 2023 and early 2024.
- See Annex for more details.

1. Estimated volumes of pre-consumer textile waste generated in Viet Nam

The estimated annual quantity of pre-consumer textile waste in Viet Nam generated from textile production for exports in 2022 ranges from **184,000 to 276,000 tonnes**, with a reference value of **250,000 tonnes**. Of the total amount of pre-consumer textile waste generated about 35% is polyester-rich, 20% cotton-rich and 45% are blended. Differentiating these types allows to approximate the potential for respective recycling technologies, as cotton knitted fabric can be recycled more easily by mechanical recycling method than other types e.g., woven fabric.

The study utilised several sources and assumptions for the estimation of the amount of textile waste generated in Viet Nam:

(1) the export volume of goods within HS code chapter 61("Articles of apparel and clothing accessories, knitted or crocheted") and 62 ("Articles of apparel and clothing accessories, not knitted or crocheted"), with the assumed waste ratio to fabric used of 10-15%;

(2) assumption that 1,000 factory workers generated approximately 100 tonnes of textile waste annually; and

(3) consultation with industry experts.

See **Annex** for more details on the methodology for the estimation.



Figure 1: Percentage of fabric composition of exported garment in 2022



Figure 2: Estimated quantity of pre-consumer fabric waste in 2022 based on exported garment volume

The volume of pre-consumer textile waste is among others estimated based on the export volume of goods within HS code chapter 61 and 62 (see **Annex** for more details) and close consultation with local experts on waste trading. Obtaining textile waste data at the country level remains a significant challenge as waste is transacted throughout a complex system not accessible to research in most cases.

The estimation based on export volumes doesn't include other forms of preconsumer textile waste, such as fabric deadstock or rejected products. Fabric deadstock is fabric leftover in the production. It is either sold to domestic buyers, re-exported or disposed of. In the first case, the deadstock sold can be registered as "repurposed goods"¹ or indirect export². If the deadstock is to be disposed of, the enterprise must follow the required procedures according to Vietnamese laws; disposal of deadstock remains the frequently used method. The <u>Viet Nam</u> <u>Waste Recycling Association</u> has developed a Helpdesk for advisory on this matter among others.

Beyond the pre-consumer textile waste generated in Viet Nam, there is further potential for aggregating waste from neighbour countries with strong textile sectors, such as Cambodia, to meet the demand of feedstock for recycling. Vietnamese regulations do not permit importing textile waste, but close proximity between textile waste recyclers in Southern Viet Nam and the border with Cambodia means that there is still an informal flow of textile waste between two countries to meet the demand for cotton-rich and polycotton textile waste by recyclers in Viet Nam.

¹Circular No. 38/2015/TT-BTC by the Ministry of Finance, Article 21

2. Overview of the textile waste value chain: Status quo and potential



Figure 3: The generalized textile waste value chain in Viet Nam

Since 2021, as co-processing facilities and waste-to-energy plants increase in number and more multinational brands declared commitment to "zero to landfill", much textile waste has been diverted from landfills and disposal by incineration. It is estimated that **60%** of pre-consumer textile waste in Viet Nam are recycled, the remaining **40%** are disposed by waste-to-energy (W2E) incineration, co-processing plants or incineration without energy recovery. Due

to lack of verified data these figures are based on consultations with industry experts only and are only indicative. Better waste management and stronger recycling infrastructure may further valorise this 40%, moving them up the waste hierarchy from W2E to recycling. This waste hierarchy principle is an order of preference for managing and disposing of waste in the most environmentally friendly manner.

Key actors in the textile waste value chain include textile manufacturers (who generate textile waste), waste handlers, waste recyclers, and waste-to-energy and co-processing plants.

The study identified more than 100 waste handlers, mainly collectors contracted with manufacturers. Waste collectors collect, process, trade and transport the waste from manufacturers, including pre-consumer textile waste. They conduct most of the waste sorting (pre-sorting and refined sorting). Pre-sorting practices typically separate textile waste from cutting based on composition (pure cotton, pure polyester, pure polyamide, blended textiles) and colour, and aim to minimise contamination of other materials. Some manufacturers have their contracted waste collectors' workers sort the wastes on-site and set up baling machines to optimize collection and transportation costs. After pre-sorting, most of the refined sorting for recycling is done manually by the waste handlers' experienced workers.

Large scale waste collectors and aggregators have their own facilities while also using a network of small waste handlers mostly for cost-effectiveness. This network, with multiple layers of small, informal firms or even household businesses, presents challenges for the traceability of recycled materials as well as workers' rights and environmental risks. Larger recyclers including more advanced and foreign-invested ones operating in Viet Nam currently mostly aim to contract or source their feedstock via large waste handlers.



Figure 4: Waste hierarchy for pre-consumer textile waste

This waste hierarchy, customised for pre-consumer textile waste, is an order of preference for managing and disposing of waste, inspired by the waste hierarchy included in the EU <u>Waste Framework Directive</u> (Article 4) and NIKE, Inc. <u>waste hierarchy</u> (FY20 Impact Report, p.95).

In line with emerging developments, medium- to large recyclers are further looking at **optimising the procurement mechanisms** as well as at alternative procurement channels **to secure the sourcing of feedstock in a more reliable and transparent manner**. There have been discussions and some pilots within the industry on direct procurement of textile waste by recyclers from manufacturers instead of going through intermediaries, such as waste collectors and aggregators. In this procurement approach, large apparel manufacturers supply their waste directly to recyclers - well-sorted and fully traceable.

For example, one polyester pre-processor producing PET (polyethylene terephthalate) 'popcorn' (recycled PET in granular form) in the South reported sourcing around 30% of its monthly feedstock, about 1,000 tonnes of PET waste, directly from manufacturers, and the remaining 70% via a network of waste handlers. A waste strategist provided a case study in which a 6-month pilot of direct procurement of EVA (ethylene-vinyl acetate) and rubber from waste sources to recyclers was discontinued and not further scaled up. Finally, a large plastic recycler in Viet Nam has included direct sourcing of feedstock from manufacturers in its procurement methods.

In addition to waste handlers, the study also identified 17 major recyclers active in textile waste recycling. Most of the identified recyclers produce recycled polyester staple fibre, recycled cotton and polycotton; their processes and products are mostly classified as downcycling as the output products are of lower quality than the original products that generate the waste. While some recyclers claim closed-loop recycling capabilities with fabrics, consultations with representatives of multinational brands have revealed that most T2T recycled polyester materials (yarn and fabric) are imported from other countries. Viet Nam currently only has the capacity to produce recycled polyester fibre and filament from PET bottles or equivalent, and not from textile waste. Meanwhile, cottonrich and polycotton textile waste are mainly downcycled into products such as rugs, carpets, and coarse yarn for home textile applications and gloves.

Not all textile waste bought by recyclers is recycled as the recycling processes themselves generate waste. For example, on average 20% of recycled cotton or polycotton fibre produced by weight are too short for subsequent production of yarn. These fibres are then used as stuffing materials or fuel for W2E schemes.



3. Mapping the pre-consumer textile waste recycling stakeholders and pathways in Viet Nam

3.1 Manufacturers

There are **approximately 7,000 textile & apparel enterprises in Viet Nam with more than 10 employees**³. A survey conducted with 162 manufacturers in April 2024 suggested that 56% of manufacturers pre-sort material waste. The level of pre-sorting varies between manufacturers, depending on brands' requirement and contracts with waste handlers. In most of the cases, presorting stays at separation of cardboard, plastics, metallic, wooden and textile materials. High-performance manufacturers separate textile waste into cotton-rich, polyester- rich, polyamide and blended waste while ensuring they are not polluted with dust, non-textile plastics, paper, metallic waste and other materials.

Depending on the waste composition and level of sorting, manufacturers pay waste handlers to collect and treat the waste or get paid by handlers for the sorted materials. **Most surveyed manufacturers conducting waste sorting reported economic and environmental benefits.**

While pre-sorting at source yields economic benefits for both manufacturers and waste handlers, manufacturers mostly pre-sort their waste due to requirement from brands. Few brands have been leading waste sorting projects, mainly for footwear with focus on EVA and rubber. Much less effort is seen with textile waste, but there are several large manufacturers championing in waste management that provide economic cases for sorting at source based on composition and colour.

Regarding the economic aspect, the average prices for sorted pre-consumer textile waste range between 0.08 and 0.22 USD per kilogram while the study was being conducted, with cotton-rich textile waste yielding the highest prices and blended textile waste the lowest. These prices are very volatile, and

generally, the demand is currently well exceeding supply. For each type of waste, the price further fluctuates in a range depending on colour, purity, and amount. In 2023, the price for cotton-rich fabric clips in Viet Nam has increased by 70%, significantly surpassing the price in Bangladesh. This was observed to be caused by a shortage in supply and competition for feedstock among existing and incoming recyclers.

Table 1: Indicative Ex Works prices for common types of sorted consumer textile waste in Northern Viet Nam as set by waste traders in 2024.

Textile waste type	Price (VND)	Price (USD) (1 USD = 25,000 VND)	Note
Cotton-rich	5,000 VND/kg	0.2 USD/kg	Beige, white, knit – high quality fabric clip price can be as high as over 20,000 VND or 0.8 USD/kg
100% PET	3,500 VND/kg	0.14 USD/kg	
Blended	2,000 VND/kg	0.08 USD/kg	
Polyamide	5,500 VND/kg	0.22 USD/kg	

³ Vietnam Textile & Apparel Association (VITAS). Vietnam Textile and Apparel Industry Directory 2024, p.9.

3.2 Waste handlers

Waste handlers act as the intermediaries in the textile waste flow: they collect waste from manufacturers, sort and pre-process waste in some cases, then sell sorted waste or pre-processed products to buyers, including bulk buyers, recyclers, co-processors and waste treatment companies. They may handle hazardous or non-hazardous waste; pre-consumer textile waste is generally considered non-hazardous waste.

This study identified **over 220 waste handlers** located in all over Viet Nam that collect, trade or aggregate pre-consumer textile waste. The list is available via <u>Asia Garment Hub and constitutes the first public database on waste handlers</u>. Viet Nam Waste Recycling Association (VWRA) has been working with GIZ for developing a directory of waste sectors linked to the textile and footwear supply chain based on this list.

Geographically, around **70%** of total textile and apparel production in Viet Nam takes place in the South. Accordingly, most textile waste handlers and recyclers are also located in the South and there is a significant flow of textile waste from the North to the South to be observed.

Some waste handlers have their own recycling facilities and recycle the collected textile waste to a certain extent. For instance, A Chau Environment Company (A Chau) produces industrial wiping cloths from cotton or polycotton textile waste of sufficient size, with the monthly production capacity of A Chau is approximately 300 tonnes, 90% of which are sold domestically while the rest are for exports.

There are also some waste handlers who act solely as intermediaries for various waste handlers and recyclers. Waste trading between handlers and their customers are usually conducted via instant messaging apps such as Zalo or private social media groups.

Waste handlers vary significantly in terms of size, from firms employing hundreds of workers that handle 30 to 70 thousand tonnes of textile or footwear waste annually to informal enterprises or households employing 5 to 20 workers handling less than a thousand tonnes of waste in a year.



Figure 5: Map of regions and number of identified waste handlers in Viet Nam.



ETC Environment Resources Investment and Technical JSC.

Established in Nam Dinh Province in 2010, ETC Environment Resources Investment and Technical JSC. (ETC) is one of the major waste collecting, sorting and treatment companies in Northern Viet Nam and the North Central region. ETC is currently a waste collection and disposal partner company for many factories in the textile & footwear supply chain in Northern Viet Nam.

- Size: 148 employees
- Annual treatment capacity: hazardous waste: 80,000 tonnes; normal industrial solid waste: 50,000 tonnes
- Waste sources: hazardous and normal industrial solid waste from textile, footwear and other factories
- Services: Hazardous and medical waste treatment; industrial waste (including textile waste) collection and sorting; environmental consulting
- Certifications: ISO 9001 / ISO 14001



Trat Cau Craft Village

Trat Cau Craft Village has 1,538 households with about 6,000 people, of which about 27-28 households are engaged in purchasing and sorting fabric waste. 90% of the remaining households are engaged in making blankets, sheets, pillows, and mattresses that may utilise textile waste.

- Size: 27-28 households
- Annual treatment capacity: 18,000 tonnes (2023)
- Waste sources: Textile waste (fabric, yarn, fibre) from textile and footwear factories
- Services: Normal industrial solid waste collection and sorting
- Certifications: N/A

3.3 Waste recyclers

The study identified **17** textile waste recyclers operating in both the North and the South of Viet Nam. They are all formally registered and have earned globally recognised certifications, including OEKO-TEX 100 and GRS. The recyclers purchase sorted textile waste from waste handlers (and directly from textile manufacturers in a few cases) to produce recycled materials and sell to manufacturers or to other customers.

Two main recycling technologies are being applied in Viet Nam:

- thermo-mechanical recycling for polyester and to a lesser extent for polyamide (Nylon) textile waste, and
- mechanical recycling for cotton-rich or blended textile waste in the form of shredding and spinning the resulting fibres.

While both methods maintain the molecular structure of the materials, thermo-mechanical recycling involve melting the thermoplastic materials, such as polyester and polyamide, and extrusion into new fibres; while the mechanical recycling method only involves mechanical actions – cutting, shredding, mixing and spinning – in recycling the textile waste.

It was recognised that currently most recyclers in Viet Nam are downcycling, with only a few recyclers capable of closed-loop recycling for cotton-rich preconsumer textile waste. In recent years, Viet Nam has become a potential location for advanced (closed-loop) recycling investors, thanks to its strategic position in the textile supply chain with vertical capability and capacity (yarn spinning, fabric mills, apparel production), and especially its significant amount of pre-consumer textile waste, among other factors.



Table 2: Waste recyclers identified in the study

No	Company name	Recycling technology	Product	Location		
In the North						
1	Vikohasan Joint Stock Company	Thermo-mechanical	Recycled polyester staple fibre	Ha Nam Province		
2	Hop Thanh Ltd. Co	Thermo-mechanical	Recycled polyester staple fibre	Thai Binh Province		
3	Khai Thanh Ltd. Co	Thermo-mechanical	Recycled polyester staple fibre	Vinh Phuc Province		
4	Nam Vang Ha Nam Polyester Staple Fibre	Thermo-mechanical	Recycled polyester staple fibre	Ha Nam Province		
5	PVTex & Shinkong Synthetic Fibres	Thermo-mechanical	Recycled polyester DTY	Hai Phong Province		
In the South						
6	Trinh Trung L.A Ltd. Co	Thermo-mechanical	Recycled polyester staple fibre	Long An Province		
7	Hang Bang Ltd. Co	Mechanical	Recycled cotton fibre	Long An Province		
8	Doan Ket International Textile	Mechanical	Blended TC recycled yarn	Long An Province		
9	Le Tam Phat Ltd. Co	Mechanical	Blended TC recycled yarn	Long An Province		
10	Recover VN	Mechanical	Recycled cotton fibre	Dong Nai Province		
11	GDI Textile Ltd. Co	Thermo-mechanical	Recycled polyester staple fibre	Tay Ninh Province		
12	Hai Thien Synthetic Fibre Ltd. Co	Thermo-mechanical	Recycled polyester staple fibre	Long An Province		
13	Mekong Fibre Limited	Thermo-mechanical	Recycled polyester staple fibre	Tien Giang Province		
14	Tah Tong Textile Ltd.	Mechanical	Recycled cotton/polyester fibre	Ba Ria – Vung Tau Province		
15	Shundao Viet Nam Industries Co., Ltd	Mechanical	Recycled cotton/polyester yarn	Long An Province		
16	Far Eastern Polytex Viet Nam	Thermo-mechanical	Recycled polyester POY, FDY, DTY	Tay Ninh Province		
17	Century (TW/VN) - Trang Bang factory	Thermo-mechanical	Recycled polyester POY, FDY, DTY	Tay Ninh Province		

3.4 Current pathways of recycling textile waste by material type in Viet Nam

In Viet Nam, pre-consumer **polyester textile waste** is pre-processed into popcorn, then being mixed with PET bottle flakes, PET waste from other industries (such as used PET trays from electronics manufacturers) to produce recycled polyester staple fibre thermo-mechanical recycling. The ratio of recycled PET from fabric waste utilised in the feedstock varies greatly from 1% to 50%. Recycled PET staple fibres of various specifications are used for domestic and export market, mainly for bedding, mattresses and stuffing materials in furniture. Lower quality PET textile waste, such as with 5% or more spandex, is subjected to make PET chips for injection moulding.

Polyamide textile waste (nylon) is pre-processed into chips, either by itself or mixed with polyamide waste collected from used fish nets. Polyamide chips are already being recycled (among others through chemical recycling procedures) in closed-loop models at production scale in some instance, such as Formosa Chemicals & Fibre Corporation's recycled nylon fibre (Sunylon) for apparels or other application, while lower quality materials are used for various downcycling pathways.

In 2023, 225 thousand tonnes of recycled PET staple fibres were exported, with a similar amount produced for domestic usage. Pure PET pre-consumer textile waste is in high demand as feedstock for the downcycling recycling sector.



Figure 6: Generalised pathway of recycled polyester textile waste in Viet Nam, based on the pathways used by surveyed recyclers.

GDI Textile Co., Ltd

Located in Tay Ninh Province (with a representative office in Ho Chi Minh City), GDI Textile manufactures recycled polyester staple fibres. GDI Textile is GRS certified.

- Size: ~300 employees
- Annual production capacity: 20,000 tonnes
- **Feedstock**: PET flakes from bottles, recycled PET 'popcorn' and PET lumps
- Products: Recycled PET staple fibres



Recycling pre-consumer **blended textile waste** is mainly mechanical recycling. The waste is sorted based on specific compositions and colours, then cut and shredded into fibre, and finally spun into relatively coarse yarn (Ne 6). This yarn is mainly used for producing PPE gloves or similar products for both domestic market and exports. Another application of blended textile waste is for production of non-woven floor covering for exports.



Figure 7: Generalised pathway of recycled blended textile waste in Viet Nam, based on the pathways used by surveyed recyclers

Tan Nam Trung

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Located in Long An Province and 100% Vietnamese owned, Tan Nam Trung recycles textile waste combined with yarn spinning for polycotton blended composition.

- Size: 125 employees
- Annual production capacity: 10,000 tonnes (recycled fibres), 7,200 tonnes (yarn)
- Feedstock: pre-consumer textile waste of various composition
- Products: recycled fibres, OE coarse polycotton yarn (Ne: 6)



The primary method for closed-loop recycling of pre-consumer cotton waste involves mechanical recycling. This process entails sorting and shredding the waste into fibres, which are then blended with virgin cotton to produce recycled yarn. Cotton-rich pre-consumer textile waste is highly valued and in demand by some domestic and foreign recyclers. Additionally, several vertically integrated apparel manufacturers are exploring internal closed-loop recycling initiatives for pre-consumer cotton waste, with some projects in trial phases and others advancing to production stages.



Recover Textile Systems (Recover™)

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Recover[™] is a leading materials science company and global producer of low-impact, high-quality recycled cotton fibre and cotton fibre blends. Its products are created in partnership with the supply chain for global retailers and brands, offering a sustainable solution to achieve circular fashion for all. Recover[™] focuses on textile-to-textile recycling of textile waste based on the mass balance approach and offers technical adoption and support services.

Backed by investment from STORY3 Capital and Goldman Sachs, Recover™ is aiming to scale its proprietary technology. The company is headquartered in Spain, with facilities in Pakistan and Bangladesh, with an additional production hub planned for Viet Nam and expected to start operation in Q4/2024.

- Feedstock: pre-consumer and post-consumer textile waste
- Products: 100% cotton and cotton-polyester blended fibre.

3.5 Co-processing, waste-to-energy (W2E), and incineration schemes for textile waste in Viet Nam

Co-processing has emerged as a recommended waste treatment method for some types of textile waste as a solution towards the "zero to landfill" goal. Co-processing technology use suitable waste materials in manufacturing processes for the purpose of energy and/or resource recovery and resultant reduction in the use of conventional fuels and/or raw materials through substitution.

In Viet Nam, co-processing mainly refers to the generation of energy from incinerating waste and uses the resulting ash as material for the cement production process. There are 5 co-processing plants in operation in Viet Nam: 3 VICEM plants (one in the north and 2 in the south), one plant belonging to Siam City Cement Viet Nam (INSEE) and one plant belonging to FICO Tay Ninh in the south of Viet Nam. In addition, some other cement manufacturers are being licensed to test co-processing technology for operation.

In addition to that, W2E plants in Viet Nam are also growing in number, which can also serve as a solution for the "zero to landfill" goal. There are **3 W2E plants in operation** in Viet Nam: one in the capital of Hanoi, one in Bac Ninh Province (Northern Viet Nam) and one in Can Tho Province (Southern Viet Nam).

In total, consultation with industry stakeholders estimates that about 40% of textile waste coming from apparel factories and 60% of textile waste coming from footwear factories are ultimately subject to co-processing and waste-toenergy, incineration, significantly higher than the 1% figure as reported in India by Fashion for Good⁴ but similar to the 45.5 % reported for the textile & apparel industry in Sri Lanka (Edirisinghe, Alwis & Wijayasundara, 2023, p.1)⁵.

Textile & footwear manufacturers **pay 1,400-2,000 VND/kg (0.056 – 0.08 USD)** for disposing pre-consumer textile waste through co-processing/W2E. The rates are **6,000-10,000 VND/kg (0.24 – 0.4 USD)** for hazardous waste.

⁴ Fashion for Good, Sattva Consulting, Reverse Resources and Saahas Zero Waste (2023). Wealth in Waste: India's Potential to Bring Textile Waste Back into the Supply Chain. p.26. <u>https://reports.fashionforgood.com/report/sorting-for-circularity-india-wealth-in-waste/</u>



Figure 9: Current operational co-processing plants in the south of Viet Nam

Although not a widespread practice, incineration of pre-consumer textile waste without energy recovery still happens in Viet Nam. Manufacturers may burn their own pre-consumer textile waste as fuel for boilers, or the waste may be burned at other facilities such as brick kilns. This practice, despite being illegal in Viet Nam, persists especially in central Viet Nam due to the lack of co- processing and licensed waste-to-energy facilities, along with factors such as transportation costs.

⁵ Edirisinghe, L. M., Alwis, A., & Wijayasundara, M. (2023). Uncovering the circular economy potential of industrial waste in Sri Lanka (case study from textile industrial - fabric waste). *E3S Web of Conferences*, *436*,08012. https://doi.org/10.1051/e3sconf/202343608012

4. Overview of traceability and compliance in Viet Nam's textile waste sector

Traceability is a relatively new concept for textile waste handlers in Viet Nam, partly due to minimal tracking requirements within an ecosystem largely focused on downcycling, co-processing, and incineration. The complexity and opacity of the waste value chain further complicate traceability efforts. A small number of handlers involved in brand-led closed-loop recycling of EVA preconsumer waste have implemented traceability practices, enabling recycled materials to re-enter production.

For many waste handlers, compliance is primarily demonstrated through permits and licenses. Some facilities, particularly those handling hazardous waste and pre-processing, face challenges related to basic compliance, especially in occupational health and safety. Certain recyclers have obtained certifications such as GRS or ISO 14001, often at the request of clients, though stakeholders continue to discuss how certification systems might evolve to better address workplace standards.

Accurate data on waste disposal methods and recycling rates remains challenging. Currently, data from waste handlers often relies on estimates, resulting in higher reported recycling rates of textile waste from apparel and footwear manufacturers - sometimes exceeding 90% - without substantial verification.

Waste contractor assessments (audits) are the primary mechanism for apparel and footwear manufacturers to select and monitor contracted waste handlers, particularly for compliance purposes. However, waste handlers have noted an excessive number of audits, many of which they feel lack substantive value. One waste contractor with over 100 employees reported receiving around 50 audits annually, estimating that fewer than 5 provided actionable insights. Such anecdotal information is backed by feedback from producers: in a GIZled survey from April 2024, approximately 50% of manufacturers reported implementing these assessments, with 85% indicating a need to improve assessment quality due to a lack of suitable tools, the complexity of the waste sector, and resource constraints. Some brands have encouraged suppliers to conduct due diligence with waste contractors, influenced by evolving EU regulations. Strong brand leadership and guidance, along with the development of a transparent, compliant, and competent waste sector that can support advanced recycling practices, have been highlighted as essential for positive change in this complex area.



5. Opportunities to further develop closed-loop recycling for textile waste in Viet Nam and in the region

Enhancing domestic recycling infrastructure in the short term

The shift toward textile-to-textile recycling presents both a threat and an opportunity for Viet Nam's established downcycling sector, which has traditionally relied on pre-consumer waste for low-value applications. With advanced recyclers now competing for pre-consumer waste, the downcycling sector **must elevate its recycling value, moving closer to textile-to-textile standards to remain viable.** There are some promising technical pathways that domestic recyclers are currently exploring and piloting:

- Cotton-rich textile waste: Viet Nam has an established capacity for mechanical textile-to-textile recycling of 100% cotton pre-consumer textile waste. Some vertically integrated manufacturers are already recycling their own cotton-rich fabric clips and are considering incorporating waste from other facilities. This business model is promising; however, challenges related to licenses, taxes, and customs have impacted efforts to scale up integrated recycling.
- Polycotton blended textile waste: Currently, polycotton blends are primarily downcycled through mechanical processes. Compared to countries like India, downcycling high-quality pre-consumer waste is viewed as a missed opportunity. There is significant potential for value chain collaboration and process optimisation to support textile-totextile recycling of blended textiles through existing and mechanical recycling technologies. Short fibres (around 20% of the textile waste feedstock) which are generated as by-product from the mechanical recycling of cotton-rich and blended materials could potentially serve as feedstock for future chemical recycling processes. There are other textile waste types, such as spandex-containing fabric clips, which are unsuitable for mechanical recycling and require advanced recycling solutions.

• **Polyester textile waste:** Pre-consumer pure PET textile waste is in high demand as feedstock, commonly mixed with PET bottle flakes for large-scale production of staple recycled PET fibres. This process is essentially a form of downcycling for both bottle flakes and textile waste. The role of this sector within emerging closed-loop recycling models - such as bottle-to-bottle and textile-to-textile recycling - requires further study to clarify its position in the shift toward closed-loop recycling.



Figure 11 - Spinning yarn from recycled fibres at Tan Nam Trung's factory

Leveraging advanced reccling technologies in line with the waste hierarchy



More advanced textile recycling technologies – often referred to as chemical recycling – are emerging as additional recycling pathway to be further scaled up. In general, chemical recycling processes chemically decomposes textiles into their fundamental components, allowing the production of fibres comparable to virgin quality. Advanced chemical recycling technologies is crucial for achieving a circular economy in the textile & apparel industry, as they promise to recycle complex materials and blends that are challenging for mechanical processes.

In recent years, numerous textile recycling companies and startups have incorporate chemical recycling – mostly for polyester - as a part of their

solutions. They include Gr3n (Switzerland), Ambercycle (USA), Samsara Eco (Australia), Syre (Sweden), Cure Technology (Netherlands), and Saya Renew (Taiwan (China)). For polycotton fibres, pioneers include Circ (USA) and BlockTexx (Australia).

Viet Nam is becoming increasingly important for advanced recycling providers due to its supply of pre-consumer textile waste, key role in the global fashion supply chain, yarn spinning capacity, and favourable economic and socio-political factors. While advanced recycling technologies are being developed to address primarily the globally bigger issue of post-consumer waste, pre-consumer waste will be essential as feedstock during the initial scaling, with a gradual shift toward post-consumer waste. Chemical recycling may thereby present an opportunity to divert pre-consumer waste from lowervalue recovery pathways like downcycling, co-processing, or waste-to-energy (W2E) to higher value recycling.

Nevertheless, both mechanical and chemical recyclers require large and reliable feedstock materials for their operation causing competition for especially readily available higher quality waste materials on the market. It is crucial to apply an adaptive feedstock strategy that prioritises high-quality feedstock for mechanical recycling and directs more complex, harder to recycle waste to advanced recycling in line with the waste hierarchy principle. This approach requires collaboration among competitors and partners along the value chain as well as a supporting regulatory framework, allowing both advanced and mechanical recyclers to co-exist in order to bring materials back into production in the most environmental and economic manner.

Against this background trade restrictions for waste materials may need to be reconsidered. In Taiwan (China), regulations now permit importing preconsumer textile waste that meets quality standards, with strict waste flow monitoring. India also allows pre-consumer textile waste imports and has piloted post-consumer waste imports. Bangladesh has advocated for similar policies. In contrast, Viet Nam restricts imports of pre-consumer textile waste, which is considered a secondary material, potentially limiting recycling growth in the country.

Creating an enabling framework and ecosystem

Industry stakeholders believe that transparent waste handling, optimised business models, and access to high-quality textile waste - supported by circularity-focused policies - are essential for Viet Nam's growth as a recycling hub as the whole industry continues to emphasise sustainability and circularity. A metabolic analysis in Thua Thien-Hue Province, conducted by the United Nations Development (UNDP) in Viet Nam, estimated that increasing the recycling and regenerative content in garment production by 20% can add 24 million USD to the province's GRP in 2030 (UNDP, 2023, p.58)⁶.

Collaboration among brands and large manufacturers, supported by increased capacity from smaller enterprises in the textile waste ecosystem and possibly positive regulatory changes, will be crucial to advancing this shift toward a circular industry. In the short term, Viet Nam's competitiveness in the textile, garment, and footwear sectors within the global supply chain are enhanced by adopting circular technologies for pre-consumer waste. In the longer term, over a 5 to 7-year horizon, the technology infrastructure can support Extended Producer Responsibility (EPR) for post-consumer textile waste generated by Viet Nam's projected population of over 100 million by 2030.



⁶United Nations Development Programme (2023). Towards a circular economy in Thua Thien-Hue Province – A metabolic analysis to assess the socio-economic and environmental impacts, UNDP, Hanoi. <u>A metabolic analysis to assess the socio-economic and environmental impacts in Thua Thien-Hue province | United Nations Development Programme</u>

6. Collective action to optimise textile waste management in Viet Nam in the shift to circularity



The initiative "To the Finish Line" (TFL) organised by GIZ and its partners, is promoting collective action to improve the environmental performance of Viet Nam's fashion supply chain. Using the Higg Facility Environment Module (FEM) as its core framework, TFL provides practical, context- specific knowledge for Viet Nam. This initiative has developed into a Professional Peer Learning Community for specialists from manufacturers, brands, and service providers. Since its inception in 2022, TFL has engaged over 910 manufacturers in 2024. TFL is now an annual training platform and a foundational course for industry-wide environmental topics. Each year, based on community needs, TFL deepens its focus with specialised topics such as energy, greenhouse gases (GHG), and waste, upholding its principle of collective action for environmental improvement at scale.

The Waste No More (WNM) initiative, implemented by GIZ and its partners, is advancing closed-loop recycling of pre-consumer waste in Viet Nam's apparel and footwear supply chain, while promoting decent work in the waste sector. Based on the findings on this mapping, the initiative engaged over 20 multinational brands, nearly 500 manufacturers and 6 textile recyclers, further waste collectors and four business associations in 2024. It has and its working on 3 key action areas: 1) Improving waste management at manufacturers to promote segregation at source and implement waste data tracking 2) Ensuring transparency, compliance and traceability in the waste sector; and 3) Piloting the production of a clothing item with 30% recycling content from textile-to-textile recycling made in Viet Nam with a domestic recycler, weaver and apparel manufacturer to showcase the technical and economic feasibility.





The United Nations Development Programme (UNDP), funded by the German Federal Ministry for Economic Cooperation and Development (BMZ) and supported by GIZ, is aiming to promote **web-based marketplaces** to foster the market for secondary materials in Viet Nam, starting with **recycled plastics and textiles**. The project supports 3 existing marketplaces in providing a more accessible and user-friendly platforms for sellers and buyers while emphasising transparency and verification.

The global programme "Go Circular" aims to support the transition to a Circular Economy (CE) at the global level and in the three partner countries: Colombia, Ghana, and Viet Nam. Go Circular works in three priority areas: i) Promoting innovation, ii) Scaling up solutions, and iii) Action in global alliances.

In Viet Nam, the project works closely with the Ministry of Planning and Investment (MPI) as well as the private sector. It aims to promote CE business models through private sector support and advice on relevant decrees and policy initiatives.

Go Circular is commissioned by the German Federal Ministry for Economic Cooperation and Development (BMZ) and implemented by the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ).

More information:

https://www.giz.de/en/worldwide/109471.html



Annex: Methodology for estimating the pre-consumer textile waste volumes

Method

- The volume of textile produced domestically in Viet Nam in 2022 is calculated indirectly via calculating the quantity of exported apparel in Viet Nam by HS code data.
- The amount of pre-consumer textile waste is then calculated from the production volume of textile
- A reasonable calculation formula was devised via close consultation with key experts and surveys with manufacturers.

X = [(A * 1.5 * 180)/(1-D)] *D/1,000,000

In which:

- X: Estimated weight quantity of exported apparel by ton
- A: Estimated quantity of exported apparel by piece
- 1.5: 1.5 m² Average needed fabric area for a piece of apparel size M
- 180: 180 gsm Average fabric weight
- D: Estimated wastage of cutting process. The commonly accepted range of 10-15% is used.

Limitations

- Product information declared in HS code is not standardised, leading to difficulties in defining product classification and raw data.
- Difficulties in verifying the accuracy of declared information of HS code.
- Time limitations leading to approximate estimation of the amount of exported textile products. Domestically produced and consumed goods were undefined.

Due to these limitations, the study does not claim that the estimated amount of pre-consumer textile waste in Viet Nam is definite and authoritative. Further study is necessary to determine more accurate data on the amount and composition of textile waste in Viet Nam.

Imprints

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