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Attached is the report you requested, entitled Textile Recycling Association - Elegant Organised Crime Group. This report is an analysis of a recent study conducted upon the UK Textile Recycling Industry, the effectiveness of regulatory compliance across the spectrum of players, stakeholders as well as the regulators prevalent within the industry.

Our analysis employed proof based data gathering strategies to minimize the possibility of inaccurate representations. Using data gathered from public domains, Freedom of Information Requests and interviews we were able to create this report.

This report details how the study found the UK textile recycling industry to be controlled by the Textile Recycling Association which harbors many paradoxes that contradict contemporary pillars of management such as governance, openness and transparency especially in matters of audit and traceability.

There is also confusion from the public perspective as this industry is closely run in-conjunction with charities. Our survey shows the public is convinced that textile recycling is an inherent charity-orientated enterprise rather than one which is run on strict commercial basis by private enterprise. This is probably due to the large number of charities operating and running charity shops where used textiles is the predominant product. Nonetheless, based on our analysis of the industry as whole the charity retail is absolutely reliant on private companies who can buy and process the surplus stock which is not sold in the charity shops.

As to whether both private enterprise and charities can run their operations with efficient and effective compliance remains difficult to achieve. Given its ability the industry acts as a very liquid source of finance due to the apparent readily accessible market entry into the industry and the readily available sources of collecting clothes for the purpose of a traceable commodity.

The concerns over compliance and regulations especially where charities are concerned regularly flares up in open sight of the public. Due to scammers and rogue operators purporting to be working on behalf of charities who may be bona fide or part of the scam are exposed through whistleblowing campaigns.

A regular search on the internet can yield numerous articles around scam and scandal centered Around textile recycling and charities. Based on our research the two bodies which are mainly responsible for compliance and regulations connected to charities namely The Charity Commission and The Fundraising Regulator. The latter actually being a private company with no powers of enforcement is key contributors to the problem of scam and scandal which is prevalent in this industry. Advances in improving and restoring public trust in this sector can only be achieved by identifying the obstructive pillars within the industry that act as barriers and prevent agents of change inducing the raising of standards of compliance and best practice.

Indeed, these obstructive pillars are deliberately in place so as to support the prominent players which derive large amounts of turnover and financial gain from the activity of recycling. In some cases the manner in which revenue is derived can be deemed Proceeds of Crime or in the least unethical profiteering at the expense of ill formed consumers who utilize recycling provision and donors that are led to believe they donate their clothes in whole to charities.

This report may be the catalyst that the textile recycling industry needs to spur regulators and corporate stakeholders into a new era of scam and scandal free way of conducting ethical and compliant concentric recycling policies. We hope this report meets your needs, generated future studies, and educates the public about the The textile recycling industry.

Bank Watch - Employing Data Gathering and Communication Strategies for Positive Social Change Social Justice League UK (sJL UK) believes the content of this report to be correct as at the date of writing. However, facts such as regulatory requirements are subject to change and users of the report should check with the Textile Recycling Association of this report to confirm the current situation. The report does not claim to be exhaustive, nor does it claim to cover all relevant areas of the industry. While steps have been taken to ensure accuracy, EJM UK cannot accept responsibility or be held liable to any person for any loss or damage arising out of or in connection with this information being inaccurate, incomplete or misleading. It is the responsibility of the potential user of this report to consult with the Textile Recycling Association and ascertain whether a particular matter is correct. This material is to be copyrighted in due course. It may be reproduced free of charge subject to the material being accurate and not used in a misleading context. The source of the material must be identified and the copyright status acknowledged. This material must not be used to endorse or used to suggest SJL Group UK's endorsement of a commercial product or service.

Key facts

SJL Group UK has completed a set of assessments on the use of Textile Recycling Association and its relationship with its various stakeholders. In particular, EJM UK wanted to understand whether there were thresholds to acceptance of certain working practices promoted by the TRA and its stakeholders which compromise the integrity of several regulatory frameworks ranging from professional negligence to criminal activity centered on fraud, scam and even theft. To present our findings in an open public arena for the purpose of considering whether such practices are acceptable to members of the public.

Regrettably, factors such as openness and transparency factors were found to be very poor across the entire spectrum of players which were the subject of our general enquiries. These players included prominent supermarket chains where we found that there was an entire disconnect between Head office and branch level in relation to identifying a clear and established textile recycling policy.

When in the few cases E.J.L. UK did manage to discuss its general enquiry with a representative of an outfit E.J.L. UK found a common pattern of chronic evasiveness as well as a lack of consideration or concern to the central issues connected to the general enquiry.

This indicates that the textile recycling industry with brand spectrum of players ranging from blue chip corporate companies to charities unwillingly to be readily accept engagement but rather discourage. Appropriate intervention by higher authorities will influence the need for change from decision makers who provide the platform for the Textile Recycling Association to operate within and NOT outside the Law. Compliance In Action wishes to promote the appropriate use of regulations applicable to working practices. However, without an understanding of consumers' rights and the expectations of members of the public should not result in putting at severe risk or hold in a bad light those parties which champion and value compliance for the purpose to maintain and improve professional standards within the textile recycling industry.

Aim of the work

Compliance In Action through its specialized work in textile recycling industry has sought it necessary to raise awareness over the toxic breakdown in regulations in this industry. Compliance In Action approach to setting about much needed change stems from a plan of engagement which informs the wide spectrum of stakeholders about problems which the working practices of the current model of textile recycling untenable and the possible solutions which should be deployed that can manage to seamlessly integrate the various conflicts between the competing multitude of regulations connected to spectra of stakeholders.

Methodology:

Four teams were set up, each team was assigned a Scope of a given regulation which included Theft Act, Fund-Raising Act, Environment Act 1990 and Competition Act 1998 all which are applicable to the current dominant textile recycling model which presently prevails. In all cases, each team executed Employing Data Gathering and Communication Strategies to reach their findings.

The teams were led through a discussion guide that started with general issues affecting textile recycling industry. Critically, the source of information for field data was readily gathered from various articles circulating the press as well 3 specialized consultation publications which were also readily available as open source data. The selection of these sources provides an accurate insight into problems which are inherent in the textile recycling industry.

EXECUTIVE SUMMARY

This report examines the working practices of the Textile Recycling Association and its array of charity partners from the perspective of Joint Venture, its nature, composition and disposition. The purpose of this report is to provide The Crown, Law Enforcement Agencies and other regulators with the information necessary for assessing the effectiveness of key regulators such as the which include the Charity Commission, Fundraising Regulator, Environment Agency, Competition, Mergers Authority and The Police to promote the need for proper governance of the textile recycling industry.

Effective 4th January 2021, Compliance In Action implemented a Policy of Openness in the textile recycling industry. The purpose of which is to compel the industry into self-correction action so that practices in the field of textile recycling are forced through public inspection to align themselves with regulations for the purpose of regulatory compliance.

Only by promoting ethical business conduct through open communication can regulatory compliance along with acceptable ethics and standards be achieved. To achieve this aim an approach was adopted that comprised of the following: Expose the current working practices through public platforms and the use of complaints procedures where applicable. Inform various stakeholder and players operating within the industry about the working practices and business conduct of the Textile Recycling Association. Establish industry wide channels for regulators to obtain information and guidance in resolving breaches to regulations and compliance.

Implement industry wide ethics-awareness and education programs on how to integrate the complete cross section of regulation so as to meet with universal. Disseminating information about the disposition of working practices, particularly information about the severe cases of malicious actions by members of the Textile Recycling Association directed towards charities not connected to the Textile Recycling Association. Taken into account other major violations centred on environmental audits and charity fraud should send a clear message to the industry in general that unethical or illegal conduct is not be tolerated any further. Based on these findings Compliance In Action is to accelerate the activity of raising awareness on these issues through wider and diverse channels of communications than it has previously deployed in the past. Increasing financial and technical support from compliance concentric stakeholders has allowed to Compliance In Action to set up a General Enquiries Hotline which is earmarked to be the most highly utilised mode of contact in the pursuit of raising standards of compliance within the textile recycling industry.

Yours sincerely, Bank Watch