

IMPLICATIONS FOR THE KENYAN MITUMBA MARKET FROM INTRODUCTION OF BASEL CONVENTION RULES IN TRADE OF SECOND-HAND CLOTHING



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Executive summary

The global trade in second-hand clothing plays an important role in extending the life of textiles and supporting circular economy objectives. Kenya is one of the most established markets for second-hand clothing. The market today provides affordable and attractive clothing to consumers across the country while also generating significant employment and income opportunities. At the same time, discussions under the Basel Convention on the control of transboundary movements of waste may introduce new rules affecting international trade in textiles fit for reuse.

This report analyses the potential implications for the Kenyan second-hand clothing market from two possible future policy directions under the Basel Convention. The analysis focuses specifically on textiles fit for reuse and not on textiles intended for recycling or final disposal. The two scenarios examined are: i) the *Waste Control Scenario* and ii) the *Building a Circular Economy Scenario*.

The *Waste Control Scenario* is based on the ambition to strengthen control of transboundary textile flows to prevent the risk of dumping of textile wastes. In this scenario, used textiles are increasingly treated within a waste framework, with stronger regulatory control measures. One of the key instruments is the expansion of Prior Informed Consent (PIC) procedures, which would require permits and approvals before shipments can take place. Textiles containing synthetic fibres should become subject to stricter controls, similar to those applied to plastic waste. The Basel Convention would become a central regulator of the trade in used textiles.

The *Building a Circular Economy Scenario* takes its point of departure in supporting and strengthening existing reuse systems and markets. In this scenario, textiles verified as fit for reuse are categorised as second-life textile products and therefore traded in a similar way as new textiles. Existing market systems, standards and quality controls are recognised as important safeguards to ensure that only textiles fit for reuse enter international trade. Textiles containing synthetic fibres can continue to

circulate in a second life, while environmental concerns linked to fibre composition and product design should primarily be addressed upstream through eco-design and production requirements for new textiles. The ambition is to strengthen market transparency and support circular textile value chains while maintaining trade continuity.

Both scenarios acknowledge the need for clearer and more harmonised classification systems for textiles in international trade. In both cases, revisions of trade codes, together with the introduction of traceability and chain-of-custody systems, are considered important measures to improve transparency, distinguish textiles fit for reuse from waste, and strengthen governance of cross-border textile flows.

The report shows that the Kenyan market for second-hand clothing is highly organised and demand driven. Imports are already regulated through standards and inspection systems managed by the Kenya Bureau of Standards (KEBS), including requirements linked to sorting, quality and pre-export verification. Importers purchase sorted and quality-controlled products based on consumer demand, seasonality and expected profitability. Studies from East Africa indicate that the share of textiles that is waste (for final disposal) is generally below 2% of imported bales.

The second-hand clothing sector is economically important in Kenya. Imports of second-hand clothing under HS6309 reached approximately USD 230 million in 2024, exceeding the value of imported new ready-made clothing. The trade also supports livelihoods for a large number of people through import, wholesale, transport and retail activities. Estimates suggest that up to two million people are directly or indirectly involved in the sector. Second-hand clothes, or *mitumba*, furthermore provides affordable clothing for low-income households and contributes to government revenues through taxes and import duties.

The analysis indicates that the *Waste Control Scenario* could have significant impacts on the Kenyan market. Expanded PIC procedures and stricter controls would likely increase lead times, administrative burdens and transaction costs. Delays in shipments could disrupt seasonal trade patterns and reduce traders' ability to respond quickly to market demand. Increased costs and uncertainty may reduce profit margins, lower

import volumes and weaken employment opportunities in the sector. There is also a risk that reduced access to second-hand clothing could increase demand for new low-cost textile products with higher associated environmental footprints.

Under the *Building a Circular Economy Scenario*, trade would continue under strengthened governance, traceability and revised classification systems. While some additional administrative costs are expected, the scenario would largely preserve existing reuse markets and support continued circulation of textiles fit for reuse. The scenario is therefore considered more compatible with Kenya's established market structures and with broader circular economy objectives.

The report concludes that one of the most important actions is to improve classification systems and trade codes so that textiles fit for reuse can be clearly distinguished from textile waste. From a Kenyan perspective, second-hand clothing imported for reuse functions as a valuable product with established demand, market controls and willingness to pay. Treating these products as second-life textiles rather than waste would better support circular economy objectives while reducing the risk of disrupting an important economic and social sector in Kenya.

Abbreviations

AGOA	African Growth and Opportunity Act
EPR	Extended Producer Responsibility
EPZ	Export Processing Zone
EPZs	Export Processing Zones
EU	European Union
HS	Harmonized System
KEBS	Kenya Bureau of Standards
KNBS	Kenya National Bureau of Statistics
MCAK	Mitumba Consortium Association of Kenya
PIC	Prior Informed Consent
PVoC	Pre-Export Verification of Conformity
SEZ	Special Economic Zone
SHC	Second-hand clothing
UNEP	United Nations Environment Programme
USD	United States Dollar

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1 Introduction

The global textile production and use is ever growing where the total worth of the fashion industry in 2023 was reaching USD 1.7 trillion (McKinsey&Company 2025). The trend of a growing production has been seen over the past years, and the expectation is that this will continue. One of the segments that contributes to the growth is fast fashion. At the same time, the environmental impacts associated with the production of textiles are under focus. Recent assessments show that 2-8% of total global greenhouse gas emissions are associated with the textile value chain and about 9% of the annual microfibre pollution to the marine environment stems from the textile value chain. Textile production also has a large water demand throughout the lifecycle and further pressure water scarcity in many regions of the world (UNEP 2020). Reducing overproduction and extending the life of produced textiles together with ensuring that the textile materials are recycled at end of life, is therefore essential for reducing the environmental impacts associated with the textile value chain (Nellström *et al.* 2025; Fois *et al.* 2026). These actions are often referred to as building a circular economy for textiles (see for example UNEP 2023) and there are ongoing actions in the European Union to work for realising higher levels of circularity for textiles (European Commission 2022; European Parliament 2025).

When a consumer no longer finds the textile useful, the lifetime of the product can be extended by assessing whether it is suitable for *reuse*, or whether it has reached end of life and is instead fit for *recycling*. Today, the circular economy for textiles is mainly for *reuse* textiles, where used textiles are collected through donations in Global North. After sorting for reuse, these are part of a global reuse system, with African second-hand clothing markets being a large customer. A study on the supply chain for used textiles collected in Sweden to reuse in Kenya show a well-functioning value chain for reuse textiles which provides a second life to the products donated (Martvall and Gustavsson 2025). Cross-border trade enables these textiles to be prepared for reuse by quality-controlled sorting operations at centres in Europe. After the textiles have been assessed fit for reuse, these are being exported as products to the Kenyan second-hand-clothing market.

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By contrast, the circular economy for textile *recycling* is being adopted slowly, and the collection of textile waste for recycling often represents a challenging business case. For both textile reuse and recycling, trade is essential to enable economic viability in the value chain and to transform these materials into products that meet market demand.

The market of second-hand clothing in Kenya is *demand driven*, where the importers in Kenya purchase goods from the sorting facilities around the globe aiming for maximising their profit. Quality, attractiveness and seasonal demands are some of the aspects considered by the importers when putting an order for a container. Concerns have been raised especially in the Global North that clothes for reuse are dumped on the African markets as a way to get rid of unwanted textile products in the global south (one example here is the Trashion report by Trunk *et al.* 2023). This is suggesting that the trade is to some extent *supply driven* and traders along the supply chain are not acting to optimise their operations. Empirical evidence from Uganda, Tanzania, Kenya and Ghana show that typically only 1-2% of the content in a bale opened at the markets are textiles without value and considered waste for final disposal (IRS 2023; Odonkor 2024; SMEP 2024; WasteAid 2024; SMEP 2026). The trade of second-hand clothes in Kenya has developed during many years and is today a mature market providing affordable and attractive clothes to people. The trade is making full use of social media and other online communication (to sorting facilities, to engage with potential buyers and sellers) and you will often hear that about 80% of the population have second-hand, or *mitumba* as it is referred to in Kenya, in their wardrobes.

Recent proposals under discussion within the Basel Convention regarding the import and export of used textiles could have negative implications for trade with these secondary products (products in second life). The Basel Convention regulates transboundary movement and environmentally sound management of hazardous wastes and certain other wastes such as plastics. Sweden, France and Denmark argued that the EU should act to bring in used textiles under the Basel Convention (MoCE 2024). There is no distinction on textiles for *reuse*, or textiles for *recycling* made, and there is neither any recognition of the importance, and role, these textiles get in their second life.

The aim of this report is to provide an overview about potential impacts on the Kenyan trade with second-hand clothes from two different scenarios of Basel Convention rules for textiles fit for reuse. The two scenarios set are based

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on the consultation answers submitted to the Basel working group in December 2025 (Basel Convention 2026b; Basel Convention 2026c) and are called *Scenario 1: Waste control* and *Scenario 2: Building Circular Economy*. The analysis is limited to examining used textiles intended for *reuse* and will assess the potential impacts on the Kenyan second-hand clothing market under these scenarios. It is worth noting that trade of second-hand clothes, fit for reuse, could very well be considered a goods that could be fully handled outside the Basel Convention if categorised as textiles in a second life. Textile waste is not allowed in imports to Kenya and safeguards and inspections are set in place to ensure compliance. The case to have second-hand textiles be treated as second life textiles fit for reuse is close to *Scenario 2: Building Circular Economy*.

This report does not include details on the trade, organisation and environmental impacts from the trade of mitumba in Kenya. For additional information on this see for example IEA and MCAK (2021, 2025), Martvall and Gustavsson (2025) or (EACCIA 2025). It should also be stressed that waste handling in Kenya, when products reach end of life, is problematic and the lack of proper waste collection and final landfilling in a safe way results in negative environmental, social and economic impacts. This is a problem for new, as well as second-hand textiles. There are no indications that second-hand textiles have a shorter life than corresponding new textiles. Recently Extended Producer Responsibility (EPR), have been introduced on second-hand as well as new clothes to support improvements in respect of handling of the products at end of life.



Figure 1: Toi market Nairobi

2 Trade codes for used textiles

The trade of textiles for reuse is based on a value chain from collection, sorting and adding further value as the products are sorted more carefully and in the last stage being sold on markets where there is a demand from customers. One of the challenges with for example the European market is that the demand for collected clothes in Europe is too small, thus there is a need to find marketplaces where this demand is found. Kenya is one of the countries where this demand is found. Today the trade in these second-hand clothes is surrounded with a number of market-based rules and guidelines, as well as national regulations and standards. The shipping of these goods will be documented as part of trade codes, which are central in terms of classification of the goods on the exporting and importing side.

Trade in used textiles intended for reuse is currently subject to considerable administrative ambiguity. A reason is that the same trade code, HS6309 “worn clothing and other worn textile articles”, is widely used for different types of reuse textile flows. In practice, the code may be applied to unsorted collected textiles, textiles sorted and prepared for reuse, post-consumer textiles intended for recycling, and even non-reusable textile fractions. As a result, customs authorities cannot always determine whether a shipment consists of marketable goods for reuse or materials that they could consider as waste. This lack of distinction is important because textiles prepared for reuse have an economic value and are traded as products within established international value chains. However, the ongoing debate over whether used textiles should be classified as waste has contributed to increasing uncertainty in how such flows are administered in cross-border trade. Today, different coding systems are used for partly overlapping purposes, and similar descriptions may refer to fundamentally different legal and commercial categories.

In practice, these codes are also used differently across the industry and may be interpreted in different ways at the national level. For example, unsorted collected textiles, often referred to as “original” clothing and commonly collected together with shoes, bags, accessories, or toys, are typically exported under HS6309. Garments that have been professionally sorted and prepared for resale as second-hand products are also generally traded under HS6309, as they are considered goods with a market value. By contrast, worn clothing consisting only of clothes, separated from other collected items, may be shipped as non-hazardous waste under Basel entry B3030. Textiles sorted for recycling are also generally treated as waste

and are commonly classified under the Basel waste entry B3030 or HS6310 “used or new rags, scrap twine, cordage, rope and cables, and worn-out articles of twine, cordage, rope or cables, of textile materials”, depending on the shipment and regulatory context.

Fact box: Classification codes

Used textiles are currently classified under different systems, which creates uncertainty in trade. A Basel code is a classification, used for regulation of transboundary waste movements. It shows what type of waste is exported or imported. HS codes are customs classifications, used for international trade statistics and tariffs.

HS6309: customs code commonly used for worn textiles, shoes, bags and accessories intended for reuse, un-sorted and sorted.

HS6310: Customs code for used or new rags, scrap twine, cordage, rope and cables, and worn-out textile articles, typically destined for recycling, recovery or disposal.

Basel B3030: code for non-hazardous textile waste under the Basel Convention. It applies only to used clothing and other textile articles that are suitable for reuse and/or recycling, and it covers textile articles exclusively.

This means that textiles prepared for reuse can be difficult to distinguish administratively from textile waste, particularly where customs classifications (HS codes) and waste classifications (Basel codes) are applied for different regulatory purposes.

In addition to HS6309, textile waste is addressed under the Basel Convention under the entry B3030 “worn clothing and other worn textile articles”. Although this entry is intended for non-hazardous textile waste, its wording closely resembles that of HS6309. This has added to the confusion, as the two codes belong to different trade-code systems but use similar terminology. In practice, B3030 may therefore be interpreted in ways that overlap with textile exports that have been sorted and assessed according to a sorting protocol as fit for reuse.

2.1 European Union actions on circular economy in the textile sector

EU actions to strengthen a circular economy for textiles gained momentum in 2022, when the European Commission adopted the EU Strategy for Sustainable and Circular Textiles. The strategy aims to increase circularity and

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resource efficiency in the textile sector, both in terms of product design, use, reuse as well as the management of textiles once they become waste. Focus is paid both at reducing overproduction and overconsumption, as well as spurring circular business models for reuse, repair, remake, and recycling (European Commission 2022).

Since 2022, the EU legislative framework has been further strengthened through the targeted revision of the Waste Framework Directive, which entered into force on 16 October 2025 (European Parliament 2025). The revised directive introduces common rules for an EU-wide EPR system for textiles, meaning that Member States must establish national EPR schemes for textile and footwear products within 30 months, that is, by 17 April 2028. Under these schemes, producers will be required to finance the collection and management of used and waste textiles, including reuse, preparing for reuse, recycling and disposal (European Parliament 2025).

The EU is also underway working on harmonised end-of-waste criteria for reuse and recycled textiles. These end-of-waste criteria will define when used textiles are fit for reuse or recycling and being treated as materials or products for a second life; a second-hand textile article (Egle *et al.* 2025a).



Figure 2: Trading second-hand clothes at Gikomba market, Nairobi.

3 The trade and sorting practices on shipments to Kenya

Trade in used textiles for reuse is organised through a largely centralised system, in which textiles collected in bulk are commonly sold to specialised sorting centres for sorting, before being sold on the global second-hand clothing market. These exports are driven by limited domestic sorting infrastructures and high labour costs in many exporting countries. Countries with developed manual sorting expertise in Europe include for example Lithuania, Belgium, Germany, the Netherlands, and Poland (Björkman 2025; Martvall and Gustavsson 2025). At the sorting centres, used textiles are assessed against a range of criteria to determine whether they are fit for reuse or not. Textiles that do not meet reuse requirements are instead directed to recycling or disposal.

In Humana Ltd's sorting centre in Vilnius (Lithuania), which is one of Europe's largest sorting centres, more than 400 sorting categories are used. The categories are based on among other things product type, fashionability, quality, and level of wear. In 2024, Humana Ltd bought 38,000 tons of used textiles in bulk from European countries, 30,000 tons (76 %) were assessed as fit for reuse. Humana Ltd is part of a larger corporate group with sorting centres and second-hand stores in several countries. Sorting centres are found in and outside of Europe, for example, Türkiye and Oman. At these sorting centres, used textiles are imported in bulk under HS6309, and sorted for reuse, before being re-exported, under HS6309, and sold to second-hand clothing actors.

The global trade in used textiles for reuse operates as an international system, where the flow of second-hand clothing is driven by demand. Africa is a key destination, absorbing around 35% of all second-hand clothes available globally. Kenya plays a central role in this trade, and the country, with its coastline and well-connected port infrastructure, functions as both a major import market and a regional hub with established distribution networks and a long tradition of commercial activity linked to these goods.

The trade in second-hand clothes in Kenya is diversified with several actors importing second-hand clothing from different countries (Figure 3). In 2024, the top four import origins of second-hand clothing to Kenya under the HS code 6309 were China (54 %), US (10%), Pakistan (10 %), Europe (8 %) and rest of world (18 %) (UN 2026a).

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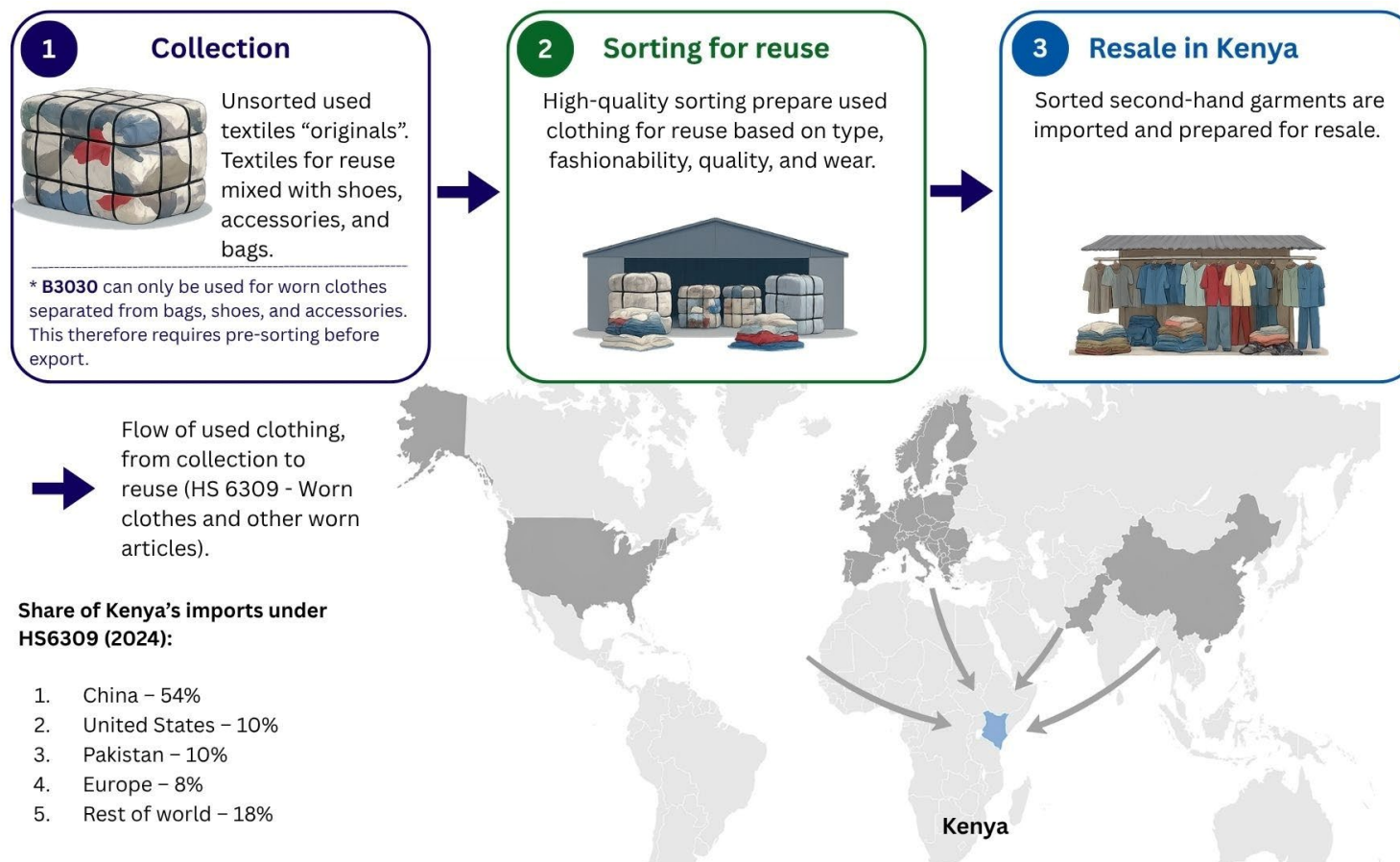


Figure 3. Value chain for used clothing under HS6309, from bulk collection and export to sorting and resale in Kenya (UN 2026a) .

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Regardless of where the second-hand clothing is purchased from, it must be sorted by type of garment. At the time of purchase, the buyer and seller agree on the order, or a so-called packing list. This contains details of the number of garments per product and in different quality grades. The products are traded in bales where each bale of about 50 kg contain a defined product category. At the national level, imports of second-hand clothing into Kenya are regulated through product standards and import requirements. Imports must be compliant with the regulations imposed by the Kenya Bureau of Standards (KEBS 2019) and all imported second-hand clothing goods must be sorted based on product type and quality and subjected to duties. KEBS stipulates criteria for packaging, treatment, content and the routines for inspections. The standard is a safeguard to avoid imports of textiles that are not fit for reuse to enter the Kenyan market.

Fact box - The supply global dynamics of second-hand clothing

Similar to the supply chain for new textile production, the post-consumer textiles value chain is a global system. After collection, the value chain depends on cross-border trade, as used textiles often need to be transported to sorting centres in other countries for high-quality sorting for reuse. At the sorting centres, textiles are manually sorted against several criteria based on commercial principles. Sales of second-hand clothes are driven by demand where Africa represents a key destination.

Before the bales of mitumba are shipped, they also need to comply with the Pre-Export Verification of Conformity (PVoC). Meaning that inspectors from approved agencies check the bales at the sorting centres before exports, at the supplier's location. One of the main ports of entry is Mombasa, where compliance involves checking that import duties and taxes are paid, and in the future ensuring that an EPR fee has been paid before consignments are allowed to enter Kenya (NEMA 2024).

A typical trade, from ordering a container with second-hand bales from a sorting facility in Asia or other place, may take around 30-40 days. At the time of placing an order the importer will place a deposit which can be in the range of 30% of the value or full value (SMEP 2026). Further, the importer agrees upon a packaging list, with sorted second-hand clothes based on quality, type, and fashionability (mixed second-hand clothes are not allowed in the bales).

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It is reported that a container of second-hand clothes from China may cost around USD 60,000 including cost of goods, freight, insurance, tax and EPR, and around USD 70,000 from Canada (see for example SMEP 2026 for additional details on costs). The handling at the entry point takes only a couple of days. Importers are ensuring that the imported goods are attractive considering the season and delays will result in slow moving items (typically the traders like to have items that can be sold quickly).

In Kenya, the market is highly fragmented with no dominant market actor. The heterogeneous market structure consists of a few larger importing organisations, but mostly smaller importers who resell bales to wholesalers and traders. Once containers are cleared, the bales are transported to warehouses and then distributed to wholesalers or specialised *mitumba* shops. From wholesalers, goods move to markets where items may be purchased and resold several times before reaching the end user. Traders continuously build their assortments, and goods may also be sold outside major urban centres (see for example Martvall and Gustavsson 2025 for more information on the trade).

In addition to sorting facilities within and outside Europe, the Humana Second Hand Fundraising Projects corporate group operates a subsidiary in Kenya, Baltic, that imports and resells second-hand clothing. They operate second-hand shops (*Think Twice*) and act as wholesalers, with wholesale stores located close to *Gikomba*, the largest second-hand market in the country but also in other towns outside Nairobi.

At the two largest second-hand markets, Gikomba and Toi Market, prices follow short selling cycles, typically ranging from a single day to a week, where early buyers pay more for high-value items, while those with lower purchasing power buy later at reduced prices.

Traders aim to move as much inventory as quickly as possible, preferably selling items individually (due to higher margins) rather than in bulk (which yields lower margins). Items that remain unsold are given price reductions and are known as *Fagia*. These items are then often sold in bulk to specialist *fagia* buyers, then re-sort and repriced from high to low and sold at secondary markets. The composition of a bale is not random to the trader and they typically have detailed knowledge on expected contents in terms of quality grade, category of clothes and brand mix (SMEP 2026). Traders will procure bales strategically to maximise their profit based on for example their available capital

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and expected local market demand and available capital. They will often have dialogue with the wholesalers, and importers where the bales are sourced. If traders get good bales from one source they tend to continue purchase from the same source, identification markers on the bales are one information marker. Many importers visit sorting facilities to secure reliable supply and maintain quality standards. Seasonal timing is crucial, and delays can result in slow-moving goods.



Figure 4: Bales ready for transport

4 Basel scenarios – Waste Control and Building a Circular Economy scenarios

There are presently no decisions on the potential changes that would come from bringing all trade in used textiles under the Basel Convention. The management of used textiles and textile waste are included in the work program for 2026-2027 (COP BC 2025). One of the key challenges lies in distinguishing between used textiles that are either i) reusable textiles, ii) textiles for recycling, iii) textiles that are waste and needing disposal or a mix of these categories. An additional aspect is that if all used textiles are referred to as 'waste', all the synthetic fibre textiles will be plastic waste and thereby potentially considered under the rules for plastic waste (Basel Convention 2026a).

Based on the responses to the consultation on Textile under the Basel Convention (Basel Convention 2026b; Basel Convention 2026c) two scenarios was constructed. These scenarios provide a basis to discuss the potential impacts that would be seen in Kenya. The main distinction between the scenarios lies in what they identify as the main concern and motivation for bringing reused textiles under the Basel Convention. The two scenarios are presented below:

- **Scenario 1: Waste Control.** The main component of this scenario is to control the transboundary shipments of textile waste and to ensure that dumping is avoided. One of the main instruments for control is implementation of Prior Informed Consent (PIC) for all goods and that textiles of synthetic fibres will be subject to stronger control measures (in analogy with rules for plastic waste). The Basel Convention becomes a central regulator of the transboundary movements of all textiles waste. The trade implications include the need for additional administration and permits (PIC) leading to longer lead times.
- **Scenario 2: Building Circular Economy.** This scenario is taking its point of departure from existing markets for reuse and seeks to ensure safeguards linked to the existing market mechanisms. Systems should be in place for market actors to ensure that only textiles fit for reuse are considered under these rules. The textiles sorted for reuse are considered second-life products and thereby synthetic fibres will be handled in the same way as new clothes. The scenario also emphasises the application

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of eco-design principles upstream in the production of new textiles, although this lies outside the mandate of stakeholders in Kenya.

Both scenarios foresee a need to revise, and add, additional trading codes under HS6309 and to ensure that the Basel Convention code B3030 better reflects existing trade in textiles for reuse. These measures will require additional administrative efforts from market participants. Both scenarios also include additional rules and standards to comply with in the trade of the textiles fit for reuse. Both scenarios also acknowledge that there is an existing trade and a large market for textiles fit for reuse. But whereas *Scenario 1: Waste Control* wants to handle this from a central institution, the *Scenario 2: Building Circular Economy* wants to build on existing market rules, conditions and best practice and have the market players ensure compliance. In a sense *Scenario 1: Waste Control* assumes that upstream organisations want to get rid of these products, while *Scenario 2: Building Circular Economy* acknowledges that second-hand clothing is a well-defined product in demand.

Table 1: Summary table of the scenarios for clothes fit for reuse

	Scenario 1 – Waste Control	Scenario 2 – Building Circular Economy
Main concern	Prevent dumping	Preserve reuse systems
PIC procedures	Broadly expanded	No. PIC only for textiles <u>not</u> fit for reuse (recycling, final disposal)
Treatment of SHC	Often closer to waste regime	Product-oriented, market can be global
Trade codes	Revision required	Revision required
Traceability	Traceability system introduced, regulatory enforcement tool	Traceability system introduced, market enabling tool
Synthetic fibres	Stronger restrictions	Second-hand clothes are textile products and handled as such, managed upstream when new clothes are put on market (eco-design)
Trade impact	Potential significant reduction/slowing	Trade will include additional administration, continuity preserved
Role of Basel	Central regulator	Supporting governance framework

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It is expected that the volumes of collected textiles in the EU will increase as part of the decided actions on circular textile strategies (European Commission 2022) and updated waste directive (European Parliament 2025). This comes with additional rules of end-of-life to ensure textiles are considered fit for a second life. There are already a number of business-to-business standards guiding the trade to ensure that products traded are well defined (Oxford Economics 2024; Martvall and Gustavsson 2025).



Figure 5: A second-hand textiles shop in Nairobi

5 Potential impacts on the trade of second-hand clothing in Kenya

Second-hand clothes are an integrated and natural part in the trade and provision of clothes to the Kenyan population. Whether the clothes are new, or second-hand is less of an issue than that of style, price and quality. Shops and markets with second-hand clothes are found in parallel to shops and markets for new clothes. The second-hand clothing market is well organised, and textiles are traded according to quality, attractiveness and ease of sales (WasteAid 2024; Martvall and Gustavsson 2025; SMEP 2026). The variation in types, as well as relative quality and price are often mentioned as reasons for opting for second-hand clothes.

The volumes of imported second-hand clothing to Kenya have increased in recent years (Figure 6).

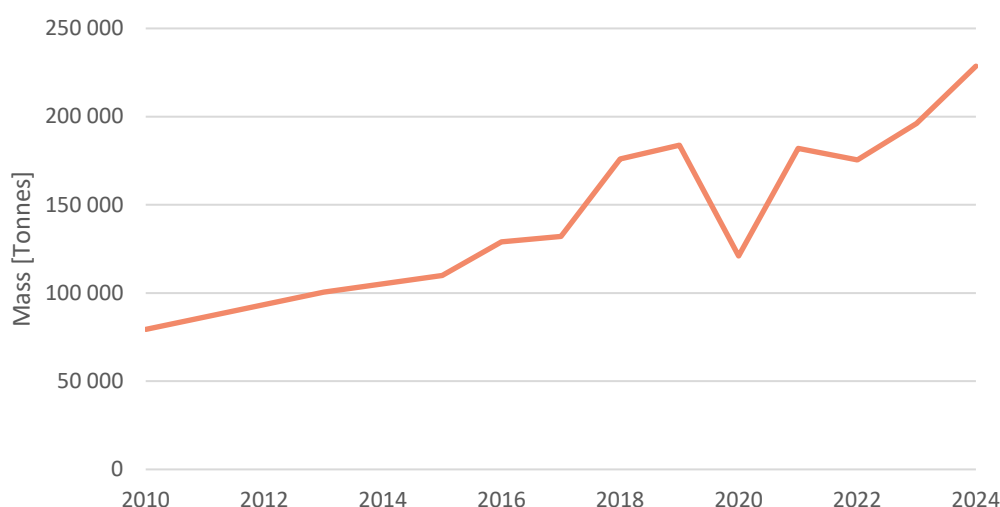


Figure 6: Kenya net import (difference between imports and exports) of second-hand clothing in tonnes, 2010–2024 (UN 2026a)

The total value of the import of used textiles (HS6309) in 2024 was about USD 230M, and the export from Kenya was around USD 2M. This can be put in relation to imports of new-clothes, ready-made, (HS codes 61 and 62) that were about USD 160M in 2024, about 70% of the value of second-hand clothes imports (Figure 7).

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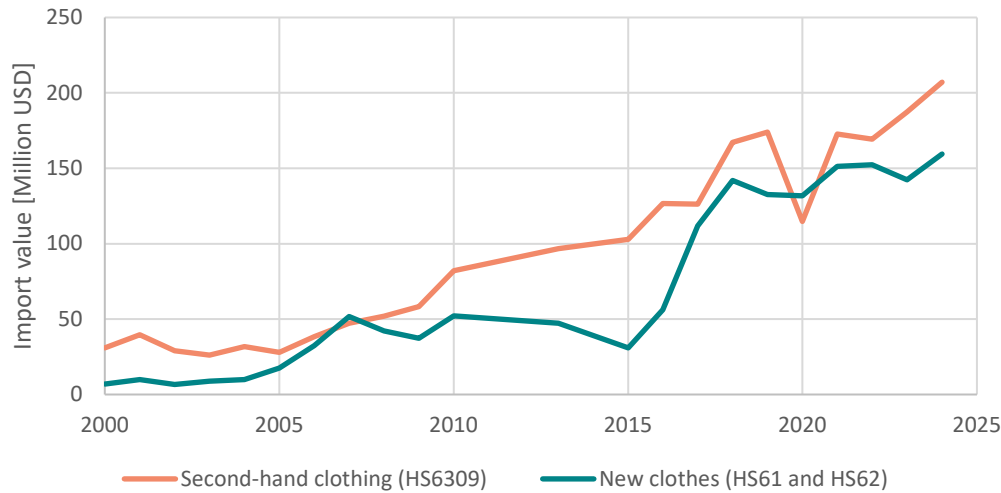


Figure 7: Import value of Second-hand clothes (HS6309) and new ready-wear clothes (HS61 and HS62) to Kenya 2000-2024 (UN 2026a)

The growing volumes of imported second-hand clothes and new, ready-made clothes should be seen in relation to a growing population and a growing economy in Kenya. Presently there are about 57 million people living in Kenya, which is an increase by about 10 million since 2014 (UN 2026b). The Kenyan economy is the most diversified and largest in East Africa, with an annual growth of about 5% in recent years (KNBS 2025). These indicators illustrate both the need for increased volumes of clothes for the population, but also that purchasing power of people is strengthened. Another driver for the new clothes is the stronger position of markets for low-cost textiles (fast-fashion and ultra-fast fashion) from different outlets, a similar trend to what has been seen in Europe and other parts of the world (see for example BOF and McKinsey&Company 2024).

In addition to the importance of the second-hand clothing sector, Kenya also have a developed textile industry. However, it is largely oriented towards export rather than for domestic market. The export-oriented textile industry imports large volumes of textile raw materials for processing to the so-called Export Processing Zones (EPZ). These zones have benefited from the EPZ programme and the African Growth and Opportunity Act (AGOA), a U.S. trade act that provides eligible Sub-Saharan African countries with enhanced market access. The EPZ garment and apparel sector under AGOA has experienced steady growth in capital investment, competitiveness, and output over the last

years (Kemboi 2023). A substantial share of the imported raw materials used in this export-oriented industry consists of synthetic fibres. In 2024, synthetics fibres (HS54–55) accounted for 64 % of the total import value of textile raw materials (HS51–59). The total value of textile raw material imports under HS51–59 amounted to approximately USD 446 million in 2024, while exports of ready-made garments (HS61–62) reached around USD 421 million (UN 2026a). This highlights Kenya's strong dependence on imported synthetic inputs for its export-driven textile industry, while domestic value addition remains limited.

The potential impacts considering the two different scenarios are presented from three different perspectives below. The first is on market and associated aspects, the second is on social and economic aspects particularly on individual and household levels, and lastly from environmental perspectives.

5.1 Potential impacts on the market and trade of second-hand clothing

Administrative and regulatory implications for trade

The introduction of PIC, which is one of the main instruments suggested in the *Scenario 1: Waste Control*, would bring a new layer of complexity to the trade. It is expected that this would drastically increase the administration and time for getting clearance for imports. Based on experience from plastic trade under Basel, the delays may be in the range of 1-6 months. This would create uncertainties and affect opportunities to meet seasonal demands and bring additional administrative costs and disrupt cash flow. In *Scenario 2: Building Circular Economy*, the products imported are considered products and should thereby be handled as such without requiring PIC.

Classification systems and trade codes

Both scenarios suggest that existing trading codes need revisions. The trade codes need to make clear distinctions of the different types and qualities of textiles fit for reuse, textiles for recycling or for disposal. With increased attention given to building circular economies this will be one central cornerstone. The off-take of the secondary products and raw materials is one of the keys to building robust circular solutions where the trade codes become one useful

instrument. These actions are similar in both scenarios but would not affect the trade in Kenya very much since Kenya only imports defined products. One difference is that the process of revising the trade codes in *Scenario 1: Waste Control* will be guided by regulating the trade and may be informed by inputs also from stakeholders with priority given to regulate the market, while for *Scenario 2: Building Circular Economy* the revision of trade codes will be informed by existing trade and market categories and guidelines. *Scenario 2: Building Circular Economy* would typically try to avoid unnecessary administrative burdens potentially resulting in less additional costs than compared to *Scenario 1: Waste Control*.

Traceability and chain-of-custody requirements

Both scenarios include introducing a chain-of-custody or traceability system for the goods. There is a difference in the actual role that this system would play in the different scenarios. In *Scenario 1: Waste Control*, the traceability system is a regulatory enforcement tool where exporters must prove that the goods exported are eligible for export. Potentially, the system would be designed with input from the regulator, but also from stakeholders. In *Scenario 2: Building Circular Economy*, the traceability system is a market enabling system bringing added values to the products. Here the system would be based on already existing market systems. These systems would affect the Kenyan market mainly through potentially higher prices on the goods purchased. While the *Scenario 1* would potentially bring higher impacts, *Scenario 2* would be less so.

Price effects, market risks and trader margin

With the introduction of additional administrative costs, the margins for the traders are estimated to be reduced. The market in Kenya is price sensitive and even though some of the second-hand clothes are sold at low costs, and the purchase power in many groups is low (IEA and MCAK 2021). There is a risk that additional administrative burdens, delays, increased uncertainties in deliveries and increased costs will make the market less attractive with reduced volumes as a result. In *Scenario 1: Waste Control* it is suggested that inclusion of PIC, restricting trading of second-hand clothes made from synthetic fibres, and further regulatory control mechanisms could potentially risk the entire trade of second-hand clothing in Kenya. Whereas *Scenario 2: Building a circular economy* would result in some extra administrative costs affecting the trade but

potentially also support some additional benefits through chain of custody and transparency of the trade.

5.2 Potential impacts on social and economic aspects

Livelihoods, income opportunities and distributional impacts

The value chain of second-hand clothes in Kenya generates jobs, tax revenues and affordable clothing. There is presently no sorting facility for reuse in Kenya, but there is an interest from stakeholders involved in importing of the second-hand clothes (HS6309) to establish this, which can further strengthen social and economic aspects within the reuse value chain.

It is not uncommon to find importers that have started as small-scale bale- or piece traders and who today import containers of textiles for re-use to Kenya. Since margins are relatively small, the bigger profits in the supply chain are found when you can handle larger volumes. The knowledge and strategies to optimise the attractiveness of the imported goods, to purchase the best bales with highest values, or strategically buy products that brings a profit is a strong driver. For importers in Kenya, it is difficult to understand the categorisation of these products as waste, since they represent valuable goods, fit for a second-life and with a strong demand.

In this context, *Scenario 1: Waste Control* would affect the trade with more control measures and a stronger regulation up-stream. There is a risk of reduced margins from the trade as quantities available will reduce, this in turn will result in higher prices to cover expenses. Whereas *Scenario 2: Building Circular Economy* would potentially provide traders with some additional information via trade codes and chain of custody. In this scenario there is a certain risk that prices may rise nominally due to added administration up-stream in the value chain.

The trade of second-hand clothes generates many income opportunities in the country. A commonly found number is that up to 2 million people are in different ways involved in the trade via direct and indirect job opportunities (IEA and MCAK 2025). Traders report that it is more difficult to make money in the trade today as the competition has become harder. The sector provides

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important livelihoods for many people and a way to have a small business. In Tanzania it was reported that 98% of the involved traders thought that the trade brought financial benefits for their families. The financial gain was the motivating factor for 61% of the respondents and lack of alternative employment was a main reason for 21% (SMEP 2026). It is possible to enter the *mitumba* trade with relatively low financial means making it an important livelihood for many people, also for those with limited resources.

The second-hand trade provides affordable clothes to people. The clothes that find a second life in Kenya provide basic clothing, where the alternative is often to have nothing. Even low-cost *new* clothes may be unaffordable to many groups in Kenya.

In *Scenario 1: Waste Control*, the potential price increase would have impacts on the trade and jobs in the sector. Potentially, the trade would decline along with the number of jobs in the sector. A further potential consequence is found in the reduced access to affordable clothes for the weakest groups in the society. In *Scenario 2: Building Circular Economy*, the risks are relatively small in terms of change in trade and jobs. Certain nominal increase in prices may arise. The access to affordable clothes should be affected nominally as well.

The *mitumba* trade generates tax and import duty revenues for the government. With decreased imports these revenue streams would be reduced. *Scenario 1: Waste Control* would potentially bring the biggest changes as volumes imported are expected to be reduced. In *Scenario 2: Building a Circular Economy* trade is expected to be able to continue.

Effects on trade dynamics and lead time

Scenario 1: Waste Control would likely result in longer lead times when purchasing second-hand clothing, reducing traders' ability to make quick transactions. There is a risk that seasonal items may be delayed and therefore lose market value by the time they arrive. An additional aspect is the impacts on cash flow with longer lead times since deposits are paid when the order is placed. These aspects would all disrupt the current trading practices, which rely on continuous dialogue between buyers and sellers and a trade that is predictive in time and quality.

In contrast, *Scenario 2: Building a Circular Economy* would not create the same prolonged lead times between purchase and sale. While it introduces some additional administrative procedures compared to today, the risk of significant delays in the supply chain are considered low. The revision of trade codes and the introduction of chain-of-custody requirements could also enhance transparency and harmonisation across the trade, supporting more predictable and accountable flows of second-hand textiles.

5.3 Potential impacts on environment

Waste fractions, market practices and quality realities

It is worth re-iterating the beginning of this section that imports considered in this discussion are only textiles fit for reuse (HS6309) and not textiles fit for recycling (HS6310). The textiles imported (HS6309) are put on the market, and there is a demand, and willingness to pay, for what is offered.

The studies made on imports of *mitumba* to East African countries show that the share of second-hand clothes that are waste and only fit for *final disposal* is typically around 1-2% of the bales (WasteAid 2024; SMEP 2026). The narrative that much of the materials that are imported as used textiles HS6309 and compliant with Kenyan standards are not sellable and end up as waste for final disposal is not supported in literature. All market actors try to sell goods at good prices, and with the *fagia* category as a sales strategy to clear inventory. *Fagia* is not a waste material, but a low priced category that is often purchased and sold at other markets.

Scenario 1: Waste Control has two different parts linked to the environment aspect. First is the assumption that second-hand clothes are dumped in the markets and secondly that synthetic fibre clothes should not enter a second life due to the environmental problems that may arise with microplastics (as part of use and final disposal). This scenario will potentially bring very little change in the share of waste in the bales since already this share is very low.

In terms of reducing opportunities for textiles with synthetic fibres to enter a second life in *Scenario 1: Waste Control* it will reduce the traded volumes. As a result, the main potential impact is that volumes of available second-hand

clothing will go down drastically. Potentially this market space would be met by new low-cost textiles that do not have restriction on synthetic fibre content.

The expectations in *Scenario 1: Waste Control* to stop dumping of textiles for reuse in Kenya is potentially not met. Indirectly this potentially triggers increased demand of new textiles that have higher environmental footprints than textiles where life is extended (Trzepacz *et al.* 2023; Fois *et al.* 2026).

In *Scenario 2: Building a Circular Economy*, the trade will continue and further traceability is introduced to improve quality and compliance with standards and trade codes. Providing a market for textiles fit for reuse extends the life for these textiles. Reuse of textiles is associated with much lower environmental footprints as compared to new products (Trzepacz *et al.* 2023; Fois *et al.* 2026).

The scenario allows for textiles fit for reuse to be considered textile products (second life) and to be handled similar to trade with new textile products. In order to be verified as 'textiles fit for reuse' the textiles need to comply with criteria and be documented as complying with these criteria. Presently, end-of-life criteria for textiles are being developed in the EU with this function (see for example Egle *et al.* 2025a; Egle *et al.* 2025b). It is anticipated that in *Scenario 2: Building a Circular Economy* the criteria for defining 'textiles fit for reuse' are developed in close dialogue with existing market actors to not (unnecessarily) disrupt existing reuse markets. The scenario acknowledges the need for eco-design actions to support a functioning circular economy but is outside the mandate of the stakeholders linked to the trade of second-hand clothing in Kenya to influence this.

Waste management and end-of-life considerations

Both scenarios acknowledge the need to improve general waste management practices for end-of-life textile products in Kenya. Further actions are needed to handle proper collection, recycling of recyclable materials and proper and environmentally safe final disposal (see for example UNEP 2018; Cook *et al.* 2026). A newly introduced EPR system in Kenya will contribute to financing good solutions and the government needs to act to further improve waste management.

6 Discussion

The trade in used textiles and *Mitumba* provides affordable, high-quality clothing and generates income for many people involved in reselling these garments in Kenya's second-hand clothing markets. Mitumba also creates employment within circular business models, where materials are reused and, after use, can serve as inputs for different industries, including open-loop recycling in Kenya.

One of the main differences between *Scenario 1: Waste Control* and the *Scenario 2: Building a Circular Economy* is found in the categorisation of what is traded and handled as products. *Scenario 1: Waste Control* has the main ambition to avoid dumping of textiles fit for reuse, while *Scenario 2: Building a Circular Economy* supports trade, and the used textiles handled are considered quality controlled textiles fit for a second life. One of the common parts of the two scenarios are found in the need to revise and improve the different codes that are used to define products in transboundary trade. In EU there will be end-of-waste criteria for textiles fit for reuse introduced as part of an implementation of new rules linked to the Waste Directive (European Parliament 2025) and the strategy of circular economy on textiles (European Commission 2022). For trade from other parts of the world trade codes may be used for similar purposes. There are safeguards and regulatory control mechanisms in place for the imports to Kenya to avoid any imports of materials that would end up as waste. Market players are acting in the same direction where all price mechanisms are focusing on sellable and attractive products for a textile market.

There are also similarities in the understanding of the role of i) further actions on eco-design and ii) need to improve general waste management in Kenya. Building and strengthening circular business models go hand in hand with eco-design where products are designed for an extended life, being also fit for reuse and recycling (see for example UNEP 2020; European Commission 2022). Applying eco-design principles is an action that is needed upstream in the value chain and should be applied to new textile products. The second-hand clothing trade in Kenya has experienced certain changes with the introduction of fast- and ultrafast-fashion items. Some of these items are not fit for reuse (due to the low quality) and would be sorted out already before entering the Kenyan market. The trade is aiming for fast moving sales that yields profit.

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Depending on what a bale contains the strategy will vary but the high ratio of unattractive articles will typically result in reactions towards the wholesale or importers.

The market is not dominated by one large importer och wholesale. For example, the Kenyan subsidiary Baltic is a large player and has about 5% share of the total imports to Kenya. An actor that wants to import a full container of second-hand clothes (HS6309) will have to have access to substantial capital since part-, or full payment will have to be paid in advance. There will be more wholesale actors than there are importers. Wholesale is where the traders get their items and at this level there are even more actors. One reason for this heterogeneity is that it is quite easy for people to start a business with second-hand clothes. Some traders have day-to-day sales and others work at larger outlets. One challenge is that, since so many are involved in the trade there is no single stakeholder who can raise the concerns, highlight priorities and demonstrate the contributions the sector provides. The heterogeneity of the market structure is also pointed out by MCAK, which estimates that about 2 million people are involved in the trade in different ways (IEA and MCAK 2021).

The second-hand clothes are price competitive and are within reach for the consumers. Same items, but new, would most often be too costly. The alternative product would most probably be low-cost imported textile products (Oxford Economics 2024; Brooks 2025). From the perspective of Kenya, it is difficult to understand why second-hand products are labelled and treated as waste considering all the rules, standards and safeguards in place, as well as a market with a high demand and a willingness to pay for the second-hand products fit for reuse.

Kenya has a large domestic production of textile products where much of the raw material is imported to the country (UN 2026a). Historically there has also been a cotton production which today is supported by government to grow and expand (RoK 2024). The revitalisation of the domestic cotton production can go hand in hand with a second-hand textile trade (EACCIA 2025; Mwatu *et al.* 2026). The second-hand textile value chain and stakeholders have accumulated much experience from these products that could be useful in further eco-design and actions to improve textile products in the country. It is also suggested that actions including establishing sorting centres in Special

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Economic Zones (SEZ) in Kenya could support the trade. If second-hand clothes fit for reuse are seen as parallel to new textiles the synergies and expertise from the two sectors can support each other to develop attractive and high-quality products.

The waste management of any textile that reach end of life in Kenya is problematic. There is need to build a system for mainly recycling and at least safe disposal when this is not in place. The re-use practices are quite advanced since already so much textile products are second-hand. Kenya is contributing to the global circular economy of textiles as products finds a second life in the market. The life of the product is prolonged, instead of most probably ending up in waste incineration or disposal. An EPR system has been introduced in Kenya to support proper waste handling of textile products at end-of-life, but much more is needed. At end-of-life recycling would be a preferred option in a circular economy. Priority should be given to building capacity for these purposes.

There is in both scenarios an identified need to revise the trading codes to better describe the products and harmonise the systems (HS and Basel Convention). The best-case scenario for the Mitumba market in Kenya is to classify textiles fit for re-use as secondary products and have them handled similarly to any textile products traded on the market and remove the notion of waste. This would be in line with the end-of-waste approach now considered in EU supporting the circular economy.

7 Concluding remarks

This report has provided an analysis of the potential impacts from introducing Basel Convention rules for textiles fit for reuse, second-hand clothes, from a Kenyan second-hand textile market perspective. The presentation has been taking its point of departure from two different scenarios; i) *Scenario 1: Waste Control* and ii) *Scenario 2: Building a Circular Economy*. The main difference between the two scenarios is found in the aim of the scenarios where in *Scenario 1: Waste Control* the main ambition is to control the waste (textile waste, including textiles fit for reuse) and the Basel Convention becomes a central regulator of this trade. *Scenario 2: Building a Circular Economy* aims to strengthen and develop the existing trade of textiles fit for reuse and considers the Basel Convention to provide a governance framework. The scenarios only consider textiles fit for reuse, not textiles for recycling or textiles for final disposal or incineration.

One of the instruments that would be introduced as a strong control measure is a PIC system. This would potentially bring substantial impact on the trade of products in Kenya. The time spent on importing from sorting centres around the world would increase and so would administrative costs. Another difference relates to the trade of textiles fit for reuse made from synthetic fibre. *Scenario 1: Waste Control* considers stronger restrictions for these products in analogy with the plastic waste trading restrictions. In *Scenario 2: Building a Circular Economy* textiles made from synthetic fibres fit for reuse are considered products in a second life and thereby handled similarly to any new textile products. The need for revising trade codes is found in both scenarios.

Second-hand clothes on the Kenyan market provide direct positive economic and social impacts. The value of the imported second-hand textiles (HS6309) is higher than corresponding imports of new clothes (HS61 and HS62) and the trade provides income for a large number of people all over the country. Second-hand clothes are affordable and attractive products to the consumers. The consumers are quality and price conscious and will find the right source corresponding to expectations and price levels.

The main risk in a *Scenario 1: Waste Control* is that the trade of second-hand textiles in Kenya would collapse due to increased costs and less attractive products, along with higher risks and reduced profits for the market players.

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Scenario 2: Building a circular economy would support a global circular economy of textile products fit for reuse.

A potential approach would be to ensure that textiles fit for re-use are categorised accordingly in the trade systems and thereby handled as second life products rather than waste. Focus on the Basel Convention would be on products where demand from the market is low, which typically would include textiles for recycling and textiles for final disposal or incineration. These categories have a much higher risk of dumping since the off-take sectors and demand is less obvious at present. The second-hand textile market in Kenya is marked by a demand and willingness to pay from customers. The market players have rules and regulations to comply with and have developed systems to ensure that products imported comply with expectations and standards.



Figure 8: Transporting bales of second-hand clothes at the Gikomba market in Nairobi.

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Appendix: Method

This project was carried out during the spring of 2026, with fieldwork conducted in Nairobi, Kenya, from mid-March to the beginning of April. The qualitative approach used semi-structured interviews with stakeholders across Kenya's textile value chain. Interviewed stakeholders included representatives from research and economy, industry actors, and businesses involved in second-hand textiles. Additional interviews were conducted with relevant actors in Sweden to provide comparative perspectives and contextualise the findings as well as recycling actors in the EU

The interviews focused on practices, perceptions, and regulatory challenges related to textile flows, reuse markets, and emerging policy framework including recent proposals under discussion within the Basel Convention.

The development of the two scenarios was done based on the responses to the consultation in December 2025 (Basel Convention 2026b). Responses were analysed and two relatively distinct groups could be identified. Based on the main differences between these two groups of responses the scenarios were developed (4. Basel scenarios – Waste Control and Building Circular Economy scenarios).

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