

Bundles of Contradiction: The Political Economy of Mitumba and Kenya's Textile Industry

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ABSTRACT

Few features of Kenya's contemporary economy lay bare the contradictions of global market integration with the clarity of the second-hand clothing trade, known locally as *mitumba*. This article approaches *mitumba* not as a discrete policy puzzle but as a window onto the political economy of a late-industrialising state caught between the discards of wealthier consumers, the conditional terms of preferential trade, and the imperatives of its own informal economy. Drawing on scholarship on global value chains, fast-fashion overproduction, and African industrial policy — and triangulating across official trade statistics, industry and policy-institute reports, investigative reporting, and the documentary record of the East African Community (EAC) used-clothing ban — the analysis traces eight entangled dimensions of the trade: its global-domestic architecture, the contours of household consumption, the labour it sustains, the digital and gendered organisation of informal entrepreneurship within it, the long-debated counterfactual of restriction, the political economy of the failed EAC ban of 2016–2018, the distributional matrix of who gains and who loses, and the textile-waste crisis now anchored at Nairobi's Dandora dumpsite. To support comparison across policy options, the analysis also develops three illustrative partial-equilibrium scenarios — for port-side quality filters, segment-targeted industrial relief, and Extended Producer Responsibility (EPR) fees — that translate the qualitative argument into transparent quantitative orders of magnitude. The argument that emerges is that *mitumba* operates simultaneously as a welfare instrument for low-income households, an absorber of informal labour, a constraint on industrial policy, and a vector of environmental injustice. To frame the question as one of permission versus prohibition is therefore to mistake its character. Integration outcomes turn less on tariff schedules than on consumption patterns, on the institutional capacity to govern waste, and on the bargaining geometries that determine whose costs are borne and whose are externalised. Kenya's room for manoeuvre on *mitumba*, properly understood, is a problem of governance rather than a binary policy choice.

INTRODUCTION

Each week the port of Mombasa receives sealed and graded bundles of used clothing. They are not, by any reasonable reckoning, a marginal feature of Kenya's apparel economy. *Mitumba* — Swahili for "bundles" — has long since passed into common usage and, more recently, into the lexicon of national policy. The same garments connect Kenyan consumers to retailers in London, Toronto, and Guangzhou; they sustain hundreds of thousands of livelihoods at *Gikomba*, *Toi*, and dozens of smaller markets across the country; and they have produced the textile mountains now plainly visible at the city's eastern edge (Brooks, 2015; Changing Markets Foundation, 2023). Whichever lens one adopts — household welfare, industrial policy, or environmental governance — *mitumba* refuses to fit neatly within any one of them.

The trade therefore furnishes an unusually rich case for engaging a question that has long animated work on African industrialisation: under what conditions, and for whom, does global market integration deliver developmental gains? The conventional binary — for or against second-hand clothing imports — narrows that question into a tariff debate, and in narrowing it forfeits most of what makes the case analytically interesting. A more productive framing reads *mitumba* as a globally embedded distribution system whose effects depend on the interaction between worldwide production patterns, regional trade architectures, and domestic political settlements (Asche, 2021; Wolff, 2020). Figure 1 sketches this architecture in schematic form, tracing the route from upstream collection in donor countries through baling, shipment, and Mombasa customs to wholesale at

Gikomba, retail at neighbourhood markets, household consumption, and eventually the waste streams that terminate at *Dandora*.

The Mitumba Value Chain

From Global North wardrobes to Nairobi disposal sites

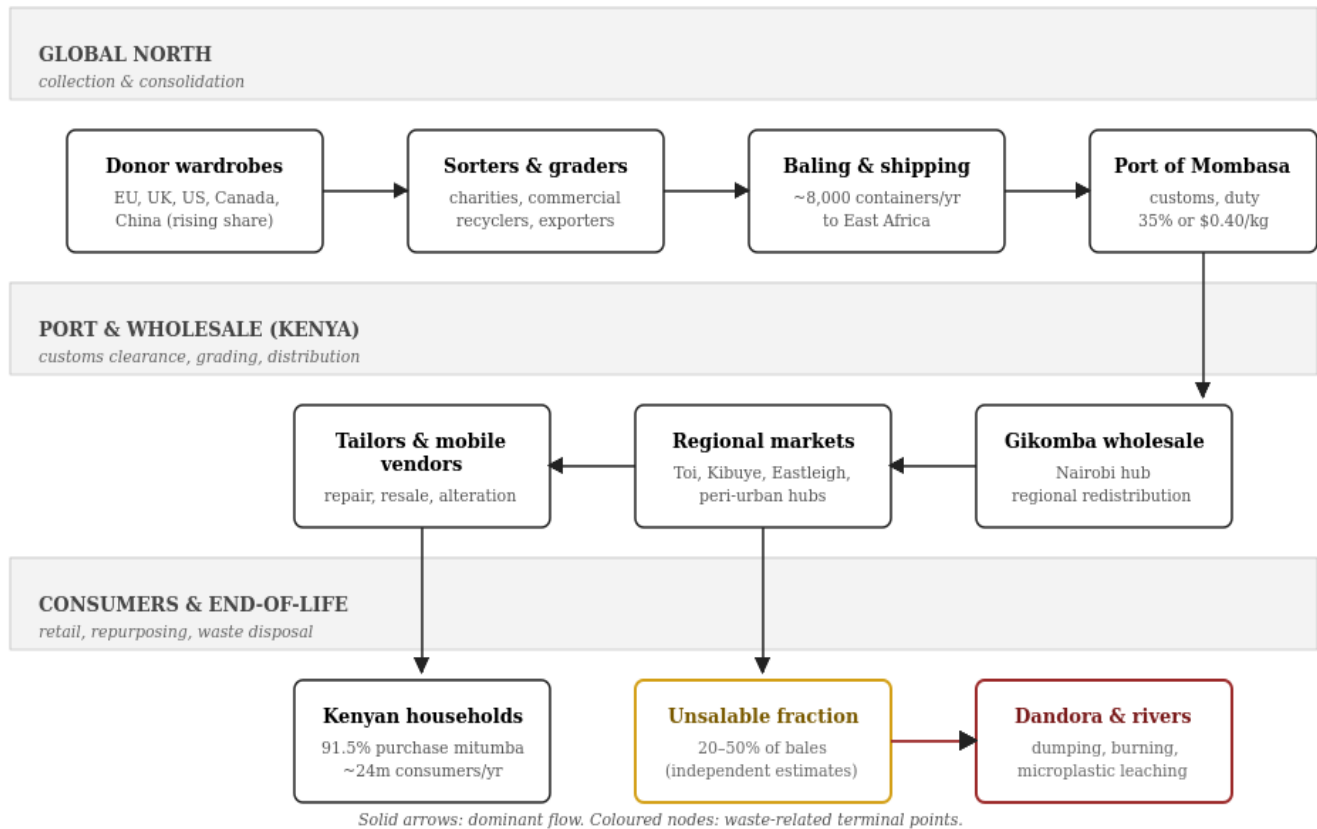


Figure 1. The mitumba value chain, from Global North wardrobes to Nairobi disposal sites.

Three observations anchor what follows. The first is that *mitumba* imports have continued to expand, sometimes sharply, even as successive Kenyan governments have pledged to revive domestic textile manufacturing (Fibre2Fashion, 2024; HapaKenya, 2025). The second is that the most ambitious recent attempt to curb those imports — the EAC's 2016 phase-out plan — collapsed under United States pressure exerted through the African Growth and Opportunity Act (AGOA), thereby exposing the limits of African industrial-policy autonomy under conditions of preferential market access (Wolff, 2020; O'Reilly and Heron, 2022). The third is that the environmental dimension of the trade has shifted from peripheral concern to structural one, with independent assessments now suggesting that a substantial share of imported bales is unsalvageable on arrival and ultimately discharged into waste streams that Kenyan municipalities are ill-equipped to manage (Changing Markets Foundation, 2023; Environment for Development Initiative, 2025).

These observations are not separate phenomena but facets of a single one. *Mitumba* is best read as a system of global discard — a downstream consequence of fast-fashion overproduction in the Global North that has been re-functionalised in Kenya as both a livelihood platform and a consumer good (Brooks, 2015; Ro, 2025). The political stakes of regulating it are therefore unusually high: any intervention immediately reorganises who can afford clothing, who earns a livelihood, who pays tax, and who absorbs the environmental externalities of consumers who live elsewhere. The article proceeds in nine main sections. After this introduction, Section 2 surveys the relevant literature; Section 3 sets out the methodology, including the explicit criteria adopted for adjudicating contested empirical claims; Sections 4 through 8 develop the substantive analysis — the global-domestic architecture of *mitumba*; labour, gendered entrepreneurship, and platform dynamics within the trade; the counterfactual debate over restriction; the political economy of the failed EAC ban; and the distributional and environmental dimensions that culminate in the policy pathways and quantitative scenarios; Section 9 acknowledges limitations and points toward a research agenda. A brief conclusion closes the argument.

LITERATURE REVIEW

The argument advanced here draws on three established bodies of scholarship and two that have only recently consolidated: research on global value chains and the political economy of integration; work on second-hand clothing flows and the global organisation of fast fashion; analysis of African industrial policy under preferential market access; the emerging literature treating textile waste as a problem of environmental injustice; and a smaller but growing literature on digital platforms and gendered entrepreneurship in African informal economies. Each illuminates a part of *mitumba*. Read together, they yield the framework deployed in the empirical sections that follow.

Asche (2021) offers a useful synthesis of how regional integration intersects with industrial policy in African contexts, with the central insight that integration outcomes depend less on the formal architecture of trade than on the institutional and political settings within which integration unfolds. That observation conditions the framing here: *mitumba* is treated not as an isolated trade flow but as one expression of a broader integration phenomenon whose effects depend on domestic absorptive capacity, regulatory competence, and the distribution of political power. A closely related point, central to the value-chains tradition, is that apparel chains are buyer-driven — that retailers, rather than manufacturers, set the terms of participation. The thesis is familiar; its consequences for Kenya's position as a downstream node in both new- and used-clothing flows are nonetheless considerable.

The literature on the second-hand clothing trade itself was reshaped by Brooks' (2015) *Clothing Poverty*, which advanced the now-foundational claim that the trade is not a humanitarian residue of charitable donation but a profit-driven supply chain organised by specialised firms operating across continents. Brooks and Simon (2012), in an influential earlier intervention, complicated the then-conventional view that used-clothing imports could be assigned principal causal weight for the decline of African textile industries. Their argument was that factory closures coincided not only with second-hand imports but also with broader liberalisation, the influx of cheap new garments from Asia, and structural shifts in the global organisation of apparel production. Hansen (2014) supplied an ethnographic register, foregrounding the agency of African traders who sort, repurpose, and recirculate imported garments through regional networks of considerable sophistication. The most recent country-level study of *mitumba* in Kenya, by Kiss (2024), concludes that the trade is best understood as a direct consequence of the ultra-fast-fashion linear business model in the Global North and that second-hand imports did not, of themselves, cause the collapse of Kenya's domestic textile industry. The earlier and more contested claim — that used-clothing imports reduce African apparel production through downward pressure on prices — is associated with Frazer (2008), whose cross-country analysis remains widely cited despite later challenges to its specification.

On the political economy of African industrial policy under AGOA-style preferences, two contributions are particularly instructive. Wolff (2020) demonstrates, through detailed comparison, that the divergent national responses to the EAC's 2016 phase-out directive cannot be reduced to differences in external pressure: each member state confronted the same United States threat. What varied was the domestic political settlement — the latitude each government enjoyed to absorb the political cost of disrupting *mitumba* livelihoods. O'Reilly and Heron (2022), building on Wolff, foreground the structural integration of export-processing-zone firms into United States value chains as the channel through which AGOA pressure translated into political constraint, particularly in Kenya. Together these two studies invite us to read *mitumba* policy as embedded simultaneously in transnational power asymmetries and in domestic political coalitions, rather than as a technocratic problem amenable to market-design solutions.

The fourth literature is younger and more eclectic, but its contribution is decisive. Reports by the Changing Markets Foundation (2023), Greenpeace Africa (2025), and the Environmental Investigation Agency (2026), together with analyses in *Nature* (Ro, 2025) and *The Guardian* (Menjíbar Reynés, 2025), have documented the systematic flow of low-grade synthetic clothing from the Global North to African destinations and the resulting accumulation of textile waste in inadequately managed landfills and waterways. Their cumulative effect has been to reposition *mitumba* from a primarily economic question into one that intersects directly with debates on environmental injustice and the global geography of waste.

A fifth body of literature — newer still, and not previously integrated into work on *mitumba* — concerns digital platforms and gendered entrepreneurship in African informal economies. Studies of mobile-money infrastructures such as M-Pesa, of WhatsApp- and Facebook-mediated micro-retail, and of women's entrepreneurship in urban East African markets describe an emergent infrastructure that has reshaped how informal trade is organised, financed, and gendered. The implications for *mitumba* are direct: although the bulk of *mitumba* commerce remains physical, mobile-money settlement, image-based social-media marketing, and platform-mediated stock photography have begun to reshape both retail practices and the gendered division of labour within the trade. Bringing these strands into contact with the established *mitumba* literature is one of the present article's secondary contributions, taken up empirically in Section 5.

The article's principal contribution is to integrate these strands within a single analytic frame that treats *mitumba* simultaneously as a global flow, a domestic livelihood system, a constraint on industrial policy, an environmental burden, and a node within an increasingly digitised informal economy — and to demonstrate that policy debates focused on any one dimension in isolation systematically miss the structural reality that connects them.

METHODOLOGY

Case-study design

This article adopts a qualitative case-study design, treating the *mitumba* trade as the case through which to examine the political economy of global market integration in late-industrialising economies. Three considerations recommended this approach. The question being posed — under what conditions and for whom integration produces developmental gains — does not lend itself readily to single-equation econometric estimation, since the relevant outcomes (livelihood security, industrial-policy autonomy, environmental burden) operate across heterogeneous domains and time horizons. *Mitumba* is, in any case, an information-rich case: the trade is large and reasonably well-documented, and the political contestation it has generated produces a discoverable record. A case-study format also permits explicit attention to mechanism — to the chain of institutional and political relationships through which integration produces its observed effects — rather than to correlation alone.

Evidence base

Four overlapping bodies of evidence inform the analysis. Peer-reviewed scholarship anchors the analytical framework and grounds specific claims about the global second-hand clothing trade, African industrial-policy outcomes, and the EAC ban episode (Brooks, 2015; Brooks and Simon, 2012; Frazer, 2008; Hansen, 2014; Kiss, 2024; O'Reilly and Heron, 2022; Wolff, 2020). Official trade and statistical data are drawn from the Kenya National Bureau of Statistics (cited via Fibre2Fashion, 2024 and HapaKenya, 2025), the Office of the United States Trade Representative (USTR, 2018), and a World Bank diagnostic of the Kenyan apparel and textile industry (World Bank, 2015). Industry-association and policy-institute reports — including those of the Mitumba Consortium Association of Kenya, the Institute of Economic Affairs–Kenya, and the International Growth Centre (Frazer and Steenbergen, 2017; Institute of Economic Affairs, 2023; IEA-Kenya, 2025) — function both as data sources and as objects of critical scrutiny, since the bodies producing them have explicit interests in the framing of the policy debate. The textile-waste dimension is documented through investigative and environmental reporting from organisations including the Changing Markets Foundation, Greenpeace Africa, the Environmental Investigation Agency, and *The Guardian* (Changing Markets Foundation, 2023; Environmental Investigation Agency, 2026; Greenpeace Africa, 2025; Menjíbar Reynés, 2025).

Adjudication criteria for contested empirical claims

A persistent feature of the *mitumba* literature is that core empirical magnitudes are contested by parties with material interests in the figures they produce. The fraction of imported bales that becomes waste, the number of livelihoods sustained by the trade, and the income elasticity of *mitumba* demand are each the subject of estimates that diverge by an order of magnitude. Treating such claims symmetrically — as though a 2 per cent waste estimate from an importer-funded report and a 40 per cent estimate from an independent audit deserved equal weight — would yield an analytically degenerate conclusion. The present article therefore adopts four explicit criteria for adjudication.

The first criterion is *methodological transparency*: whether the cited estimate is accompanied by a published account of sampling, measurement, and inference, sufficient to permit at least notional replication. The second is *independence from material interest*: whether the producing organisation stands to benefit from a particular range of estimates, and if so whether that bias is acknowledged or controlled. The third is *temporal proximity*: whether the estimate is drawn from a period in which the relevant flows, technologies, or institutional arrangements were substantially similar to those obtaining today, since 2010-era figures for synthetic-fibre content, for example, considerably understate present-day shares. The fourth is *convergence*: whether the estimate is consistent with figures produced by independent sources adopting different methodologies. Where these criteria pull in the same direction — as they do, for instance, on the unsalable share of bales, where independent field assessments converge in the 20–50 per cent range while industry-aligned figures cluster around 2 per cent — the article favours the convergent independent estimate while reporting the disagreement explicitly. The same logic informs the treatment of employment estimates, which are accepted as plausible orders of magnitude rather than precise figures, and of income-elasticity claims, which are reported with the qualifier that they originate from a single advocacy-aligned source and have not been independently replicated.

These criteria do not eliminate uncertainty. They make the basis for weighting claims explicit, allow readers to apply different weightings if they so choose, and discipline the analysis against the temptation to treat all available numbers as equivalently informative.

The Global and Domestic Architecture of Mitumba

To grasp what is happening at *Gikomba*, one must first look beyond Kenya. The second-hand clothing trade is not the humanitarian residue of charitable giving. It is a maturely organised industry in which used garments are collected, sorted, graded, baled, shipped, and resold by a chain of specialised firms working across continents (Brooks, 2015). Brooks's central observation, now widely accepted, is that what consumers in donor countries imagine as benevolent donation is in practice a profit-driven supply chain. Decisions about which bales are routed where are governed less by recipient need than by exporter calculation: anticipated resale value, transport cost, and tariff exposure together determine destination.

Kenya occupies a major importing position within this system. In the year ending March 2024 the country imported 206,580 tonnes of *mitumba*, with volume up 14.5 per cent and value up 33.3 per cent on the previous year, reaching roughly USD 218 million (Fibre2Fashion, 2024). By the close of calendar year 2024 the figure had risen further, to 230,535 tonnes (IEA-Kenya, 2025). Kenya now ranks among the world's leading importers of used clothing and is the largest in Africa (Kiss, 2024). The principal point of entry is the port of Mombasa; from there the bales travel inland to wholesale hubs in Nairobi, primarily *Gikomba*, widely regarded as East Africa's central marketplace for second-hand clothes, before fanning out across the region. The composition of supply has shifted in ways that warrant registering. Once dominated by donors in Europe and North America, the trade now comprises a substantial Chinese component. Research by the Environment for Development Initiative (2025) documents that in 2023, China supplied roughly 32,000 tonnes of *mitumba* to Kenya — sufficient to make it the country's single largest source. Composition matters because the quality profile of incoming bales, and therefore the share that ultimately becomes waste, depends on what is collected upstream and how it is processed. The accelerating turnover of fast and ultra-fast fashion has been pushing more synthetic, lower-durability garments into global resale streams, with predictable consequences for residual value at destination (Ro, 2025).

Two upstream developments account for the trade's transformation over the past two decades. The first is the rise of fast fashion, which has compressed garment lifecycles and has nudged clothing from the category of durable household goods toward something closer to disposable. Industry projections suggest that global apparel production is on track to reach roughly 200 billion garments per year by 2030, sharply above levels in the early 2000s (Ro, 2025). The Ellen MacArthur Foundation has reported that some 70 per cent of donated clothing in developed countries enters international resale markets, with a substantial portion routed to African destinations (Ethical Business Africa, 2025). The second development is the displacement of natural fibres by synthetics in mass-market apparel. Polyester, acrylic, and blended fabrics now dominate fast-fashion production. They wear less durably and prove far more difficult to repurpose, recycle, or biodegrade. The bales arriving in Mombasa today therefore carry a higher fraction of low-residual-value, environmentally problematic material than those that arrived a generation ago — a shift whose consequences will reappear in Sections 7 and 8.

If the supply side is global, the demand side is intensely local. *Mitumba* has become a structural feature of how Kenyan households clothe themselves. Surveys associated with the Institute of Economic Affairs estimate that 91.5 per cent of households purchase second-hand clothing, that the average household allocates roughly KSh 409 per quarter to used items against KSh 783 to new ones, and that some 24 million Kenyans now buy *mitumba* in any given year (HapaKenya, 2025). These figures originate from advocacy-aligned reporting and should be read, in accordance with the criteria set out in Section 3.3, as plausible orders of magnitude rather than precise estimates. The underlying economic logic, however, is robust. Incomes are rising, but new clothing remains expensive relative to second-hand. *Mitumba* is between three and seven times cheaper than equivalent new garments (Rivoli, 2013), and where roughly 20 million Kenyans live below the national poverty line that price differential is decisive for consumption choices (IEA-Kenya, 2025). The 2024 Tax Laws (Amendment) Act, which abolished the Import Declaration Fee and the Railway Development Levy on imported used clothing, has further reduced the landed cost of *mitumba* — a policy adjustment that sits uneasily beside the industrialisation rhetoric of successive administrations (Standard Media, 2025). Against the popular narrative, it is worth registering that Kenya now imports both new textiles and *mitumba* on a substantial scale: Economic Survey 2025 data place 2024 imports of new textiles at roughly KSh 60 billion, against *mitumba* imports of KSh 28 billion (HapaKenya, 2025). The ratio complicates any account that treats *mitumba* as the singular cause of domestic-industry weakness.

Vendors at *Gikomba* and its peer markets supply something domestic manufacturers cannot easily match: variety, recognisable global labels, and price points that reflect the high energy costs, expensive imported inputs, and unreliable electricity supply that constrain local production (World Bank, 2015). The Institute of Economic Affairs has argued, drawing on household-budget data, that the income elasticity of *mitumba* demand is positive and high — a one per cent rise in incomes is associated with a roughly twelve per cent rise in *mitumba* consumption — and that *mitumba* and new clothes occupy distinct rather than directly competing market segments (IEA-Kenya, 2025). The position is contested. The IEA estimate originates from a single advocacy-aligned source and has not been independently replicated; by the criteria of Section 3.3 it warrants the qualifier "indicative rather than established." The broader empirical pattern, however, is robust: *mitumba* growth has continued through periods of both rising and stagnating incomes. The market is informal but not unstructured. Importers contend with regulatory hurdles, pay duties of 35 per cent or USD 0.40 per kilogram (whichever is higher), and finance transactions in bulk, typically committing upwards of USD 15,000 per consignment before goods arrive at port (Standard Media, 2025). The *mitumba* trade is, in consequence, better understood as a tightly woven commercial network than as a haphazard flea market, and its scale of organisation goes some way toward explaining why crude regulatory interventions tend to founder.

Labour, Gendered Entrepreneurship, and Platform Dynamics

The scale and texture of *mitumba* labour

A purely consumption-side reading of *mitumba* misses what is, politically, the trade's most consequential feature: its capacity to absorb labour. Employment is generated at every node of the chain. Dock handlers and customs brokers in Mombasa; long-haul transporters; wholesalers; retail vendors; tailors and menders; market porters; security guards; food vendors; informal financiers — all are part of the architecture. The country imports an average of 8,000 forty-foot containers of *mitumba* each year, and each must be unloaded, transported, broken down, sorted, and distributed (Institute of Economic Affairs, 2023).

Estimates of total employment vary, in part because much of the work is informal and unrecorded. The Mitumba Consortium Association of Kenya, in a report compiled with the Institute of Economic Affairs, places the figure at roughly two million people who depend on the trade for their primary livelihood, the majority of them women, youth, and informal traders (HapaKenya, 2025). Industry-funded estimates warrant some caution, given the producers' interest in inflating the welfare argument; the order of magnitude, however, is broadly consistent with KNBS Manpower Survey data, which place *mitumba* and footwear within a category accounting for around ten per cent of the extended labour force (Institute of Economic Affairs, 2023). Whatever the precise figure, two features are striking. The labour absorbed by *mitumba* is concentrated in occupational segments where the formal economy generates little employment. With persistently high youth unemployment and a small formal manufacturing base, second-hand clothing has become one of the few accessible entry points to self-employment

for those without formal credentials (Hansen, 2014). And the labour involved is genuinely skilled, even if not formally credentialed. Vendors learn to grade incoming bales by feel and visual inspection, to anticipate seasonal demand, to manage informal credit, and to read shifting consumer preferences; tailors and menders adapt garments for new wearers, recovering value from items that would otherwise be discarded (Hansen, 2014).

Gendered entrepreneurship within the trade

Women dominate the retail end of *mitumba* and are particularly visible in market stalls, mobile vending, and tailoring micro-enterprises. The income generated is modest and irregular, but it often functions as a bridge to economic agency in households where formal-sector wage work is unavailable. This pattern explains why proposals to ban or sharply restrict the trade have consistently encountered immediate resistance from women's groups and informal-sector associations (Brooks and Simon, 2012). The gendered division of labour within the *mitumba* economy is, however, not symmetric. The capital-intensive upstream nodes — bulk importation, wholesale distribution, port logistics — are dominated by men with access to formal credit and import licences. Women predominate at the retail and value-addition end, where entry costs are lower but margins are correspondingly thinner. The result is an entrepreneurial structure in which women bear most of the labour and most of the visible commercial activity but capture a smaller share of the trade's aggregate margin. The phenomenon mirrors patterns documented across African informal economies more broadly and complicates any simple narrative of *mitumba* as straightforwardly empowering for women (Hansen, 2014).

A further sociological dimension concerns how thoroughly *mitumba* has been integrated into the texture of everyday Kenyan life. The trade has shaped not only access to clothing but consumer aesthetics, fashion cycles, and the categories through which Kenyans evaluate value in apparel. Branded items unaffordable as new purchases circulate widely through *mitumba* networks at price points compatible with middle- and lower-income budgets, and the most successful traders are those who anticipate, rather than merely react to, what their customers want (Hansen, 2014).

Platform dynamics and the digitisation of informal retail

The *mitumba* trade is conventionally described in terms of its physical infrastructure — bales, market stalls, dock cranes, transport corridors. That description, while accurate, has become increasingly incomplete. Over the past decade, the trade's organisational backbone has come to include a layer of digital and platform-mediated practices that warrant attention in their own right. The infrastructure of mobile money, principally M-Pesa, has reshaped the financing of *mitumba* commerce. Wholesalers and retailers who once relied exclusively on cash now settle transactions, extend short-term credit, and manage working capital through mobile-money channels. The implications for women traders, who have historically been excluded from formal banking, are particularly important: mobile money has lowered the cost of receiving payments, holding balances, and remitting income to dependents in rural areas. The trade's organisational practices have, in consequence, become more digitally legible, even where the underlying commerce remains physical.

A second platform dynamic operates at the retail end. Social-media-mediated marketing — most visibly on WhatsApp, Facebook Marketplace, Instagram, and TikTok — has produced what is, in effect, a parallel layer of *mitumba* retail. Vendors photograph newly opened bales, post images to status updates or curated feeds, and conduct sales conversations through direct messaging. Buyers select items remotely and collect them at market stalls or arrange delivery through informal courier networks. The effect is to extend the geographical reach of *mitumba* retail beyond the physical market, to reduce search costs for buyers, and to allow vendors to specialise in niche segments — vintage denim, sportswear, kitenge-style restyled pieces — that would not sustain a stationary stall. The phenomenon parallels developments documented in other African informal economies, where platform-mediated retail has emerged as a complement to, rather than a substitute for, physical commerce.

These platform dynamics carry analytical implications for the broader argument of the article. They render the trade more legible to potential regulators — a digitally settled transaction leaves a record that a cash transaction does not — and therefore expand the menu of governance options available to a willing state. They alter the gendered organisation of the trade, lowering some entry barriers for women while creating new ones at the platform-management layer. And they raise the prospect, taken up in Section 8, that future *mitumba* governance could deploy platform infrastructure for quality monitoring, EPR fee collection, or consumer information

disclosure in ways that have not previously been feasible. None of this implies that *mitumba* is on the cusp of being absorbed into the formal economy. It does imply that the line between formal and informal is more porous, and the governance possibilities more varied, than the conventional account suggests.

The livelihood implications for the counterfactual

These livelihood facts — the scale of labour absorbed, the gendered organisation of the trade, and the increasing digital legibility of its retail layer — shape the counterfactual question that runs through the *mitumba* debate. The question is straightforward in form and difficult in substance. Were imports curtailed, would domestic apparel production expand to fill the gap; and would the new jobs, value addition, and industrial linkages outweigh the costs to consumers and traders? Section 6 takes up that counterfactual in detail. The relevant point here is that any honest counterfactual must account for the displacement effects on the labour and entrepreneurial structure described above. A *mitumba* restriction is not simply a tariff change; it is the dismantling of a labour-absorption infrastructure that has accreted over three decades.

The Counterfactual: Would Restriction Revive Domestic Production?

The central analytic question of the *mitumba* debate is straightforward in form and difficult in substance. Were imports curtailed, would domestic apparel production expand to fill the gap; and would the new jobs, value addition, and industrial linkages outweigh the costs to consumers and traders? Empirically the evidence is divided. Frazer's (2008) influential cross-country study found that used-clothing imports are associated with reduced apparel production across sub-Saharan Africa, with the effect operating through downward pressure on prices. Frazer's analysis is suggestive rather than dispositive — it relies on national comparisons and aggregate data — but it has been widely cited as evidence that *mitumba* meaningfully crowds out local production. Subsequent research has complicated the picture. Brooks and Simon (2012), in a careful re-examination of African textile-industry decline, argued that factory closures across the region coincided not only with the rise of second-hand imports but also with broader trade liberalisation, the influx of cheap new garments from Asia, and structural shifts in global apparel production. More recently, Kiss (2024, pp. 28–31) has concluded, on the basis of a synthesis of available evidence, that the influx of second-hand clothing did not by itself precipitate the failure of Kenya's domestic textile industry. That decline was already underway, propelled by the rollback of import-substitution policies, structural-adjustment-era liberalisation, and competition from new clothing imports. In 2019, second-hand clothing represented only about 12.5 per cent of total textile imports — a substantial share, but smaller than that of new imports (Kiss, 2024, p. 30).

For Kenya specifically, the empirical case for blaming *mitumba* looks weak when set against the case for blaming a layered set of structural problems. A World Bank diagnostic of the Kenyan apparel and textile industry, focused on export-oriented firms but with implications for the domestic segment, identified high energy costs, expensive imported inputs, outdated machinery, fragmented supply chains, and limited financing as the binding constraints on competitiveness (World Bank, 2015). Without addressing those constraints, removing *mitumba* would in all likelihood raise prices for consumers without producing a meaningful expansion of domestic manufacturing. Local producers themselves emphasise that competing with the price points of pre-sorted imported bales is structurally impossible at current input costs (Standard Media, 2025). The historical record reinforces the point. At its peak in the 1980s, Kenya's domestic textile industry employed more than half a million people, drawing on cotton farms in regions such as Nyanza and Eastern Province and feeding integrated mills, ginneries, and tailoring operations. By the 2010s that figure had collapsed to fewer than 20,000 (Kiss, 2024). The proximate causes were structural-adjustment-era liberalisation, the loss of competitive standing against Asian producers in new clothing, and the breakdown of the cotton-textile-apparel value chain at multiple points simultaneously. *Mitumba* expanded into the gap that this collapse had created; it did not cause the collapse. The policy interventions that would actually expand Kenya's textile and apparel manufacturing — reducing tariffs on intermediate inputs, lowering energy costs, modernising machinery, supporting cotton-farming reform — are largely orthogonal to the *mitumba* question (IEA-Kenya, 2025). The political appeal of a ban is precisely that it offers a single, discrete target. Its developmental utility is far less evident.

A simple back-of-the-envelope arithmetic clarifies the magnitudes involved. Suppose, generously, that a tightly enforced *mitumba* ban reduced second-hand imports by 80 per cent — say, from 230,000 tonnes to 46,000 tonnes per year — and that domestic production captured 50 per cent of the displaced consumption (the rest substituted

into new imports or simply went unmet). Suppose further that each tonne of domestic apparel output requires the labour-equivalent of 12 full-time-equivalent workers across the value chain, a figure broadly consistent with mid-range estimates for apparel-sector labour intensity in low-wage economies. The implied employment gain would be in the region of 1.1 million workers. Against this would be set the displacement of livelihoods currently sustained by *mitumba*: even at the lower end of credible employment estimates (say 600,000 directly dependent on the trade), and assuming half of those workers were redeployable into a hypothetical expanded domestic sector, the net employment gain narrows considerably. Once the more credible employment range (1–2 million dependent on *mitumba*) is used, the arithmetic turns negative. This is a stylised exercise rather than a forecast; the elasticities and labour coefficients are illustrative. Its purpose is to make explicit a point that the qualitative literature already supports: a *mitumba* ban that succeeded in displacing the trade would generate, at best, an ambiguous net employment effect, and at worst a substantial net employment loss before any consumer-welfare effects were added.

The Political Economy of Restriction: AGOA, the EAC Ban, and Domestic Politics

The most consequential recent attempt to restrict *mitumba* was not domestic but regional. In 2016 the EAC adopted a directive committing Kenya, Uganda, Rwanda, Tanzania, and Burundi to phase out imports of second-hand clothing and footwear by 2019, with the explicit aim of stimulating regional textile and apparel manufacturing (Wolff, 2020). In strictly economic terms the directive was a small matter. United States exports of used clothing to the entire EAC amounted to less than USD 30 million — a trivial figure in the United States trade context (Frazer and Steenbergen, 2017). The political response was disproportionate. The Secondary Materials and Recycled Textiles Association (SMART), a United States industry body representing collectors and graders of used clothing, filed a petition under AGOA in March 2017, alleging that the EAC directive imposed significant economic hardship on the United States and was inconsistent with AGOA's beneficiary criteria (Borneman, 2017). The Office of the United States Trade Representative accepted the petition and initiated an out-of-cycle review of the AGOA eligibility of Rwanda, Tanzania, and Uganda (USTR, 2018). Kenya, having separately moved in mid-2017 to insulate its AGOA position by reducing duties to pre-2016 levels, was excluded from the review (O'Reilly and Heron, 2022).

The outcome laid bare the asymmetric leverage built into AGOA. In March 2018 the Trump administration determined that Rwanda was not making sufficient progress toward eliminating barriers to United States trade and partially suspended its duty-free apparel access (USTR, 2018). Tanzania and Uganda each backed down before the determination was made; Burundi, already suspended from AGOA on unrelated grounds, remained outside. Of the original signatories only Rwanda held the line — at the cost of its preferential access for apparel exports (O'Reilly and Heron, 2022). Two scholarly accounts of the episode are particularly instructive. Wolff (2020), drawing on detailed comparative case studies, argues that the divergent responses of Rwanda and the other EAC states cannot be reduced to differences in external pressure: each state confronted the same United States threat. What differed was the domestic political settlement. Rwanda's strong, dominant party system insulated decision-makers from the immediate political costs of supplier and consumer protest, allowing it to absorb the AGOA loss in pursuit of a longer-term industrial strategy. Kenya's more competitive clientelist political settlement rendered any policy that disrupted *mitumba* livelihoods politically expensive in real time, particularly given the weight of *mitumba* traders in urban informal economies. O'Reilly and Heron (2022), building on Wolff, foreground the structural integration of EPZ-based apparel exporters into United States value chains: with up to 80 per cent of Kenya's EPZ firms producing for the United States market under AGOA preferences, a ban that risked retaliation was politically and economically untenable. The episode is a textbook illustration of the constraints on industrial-policy autonomy under conditions of asymmetric trade preference. Kenya's stated objective of textile-sector revitalisation sat in direct tension with its existing dependence on preferential apparel access. The instrument that might have created space for domestic manufacturing — restricting cheap imports — would have foreclosed the export channel through which the existing manufacturing base was already operating.

To read Kenya's retreat from the EAC ban as a story of United States pressure alone is to miss an equally consequential domestic dynamic. *Mitumba* is woven into urban and peri-urban political economies in ways that render any visible disruption politically costly. Restricting imports raises consumer prices, narrows wardrobe choices, displaces traders, and reverberates through public discourse with unusual speed (Wolff, 2020). Wolff's

comparative analysis showed that variation in EAC-state implementation of the directive correlated less with external pressure than with the relative weight of *mitumba* constituencies in domestic politics. Where political leadership could afford to alienate vendors, tighter controls became feasible; where consumers, traders, or the cost of living were politically salient, restriction proved unsustainable. Kenya falls clearly into the second category. The country's dense informal-sector hubs — *Gikomba, Toi, Kibuye* in Kisumu, the night markets of Nairobi's outskirts — ensure that policy disruptions are felt immediately and across electoral coalitions. The 2022 general election made the dynamic visible. When the Azimio coalition's presidential candidate suggested boosting local textile production in ways that some traders interpreted as preliminary to restricting *mitumba* imports, the proposal became a campaign-trail liability; the eventual victor, by contrast, courted *mitumba* traders and incorporated their interests into his coalition (Standard Media, 2025). Subsequent policy moves, including the 2024 Tax Laws (Amendment) Act's removal of the Import Declaration Fee on used clothing, have signalled accommodation rather than restriction. Government rhetoric concerning revitalisation of the cotton, textile, and apparel sector has continued — including through the National Cotton, Textile, and Apparel (CTA) Policy 2024 — but progress on implementation has been halting, and the country's two state-linked textile mills have struggled to scale even after rehabilitation efforts (Standard Media, 2025). The implication is not that restriction is impossible, but that any politically viable strategy must reckon with the existing political settlement around *mitumba*. Kenya's experience suggests that a policy approach that treats *mitumba* livelihoods as a constituency to be accommodated, rather than displaced, is more likely to yield durable outcomes than one that treats restriction as a self-evident industrial-policy goal.

Distributional Politics, Environmental Injustice, and Policy Pathways

The distributional matrix

A productive way of reading the *mitumba* trade is as a distributional system that allocates costs and benefits across at least five distinct constituencies. Figure 2 sets these out as a matrix, distinguishing primary stakes, direction of interest, political organisation, and bargaining power.

Stakeholder Interests in the Mitumba Trade

Distributional matrix: gains, losses, and political organisation

Stakeholder group	Primary stake	Direction of interest	Political organisation	Bargaining power
Low-income consumers	access to affordable durable clothing	PRO-mitumba welfare loss if restricted	diffuse (via electoral salience of cost of living)	High through price sensitivity; low in formal lobbying
Informal labour pool vendors, tailors, porters (majority women)	primary or secondary livelihood	PRO-mitumba income depends on flow	moderate (MCAK, women's associations)	High via electoral visibility of urban market hubs
Domestic textile producers incl. EPZ exporters	competitive position in domestic market	ANTI-mitumba* *EPZ firms ambivalent due to AGOA exposure	concentrated (KAM, KTMA)	High via formal channels; limited electoral weight
Kenyan state (Treasury, Trade, Environment ministries)	revenue, AGOA, environment, jobs	MIXED ~KSh 12bn customs; unpriced externalities	internally divided across ministries	High formal authority, constrained by AGOA and political settlement
External actors USTR, SMART, fast-fashion brands	market access for used-clothing exports	PRO-mitumba resist EAC restrictions	highly organised (SMART petition, USTR review)	Decisive via AGOA conditionality; asymmetric leverage

Five constituencies, five distinct calculus. Any policy intervention reorganises this matrix.

Figure 2. Stakeholder interests in the mitumba trade: distributional matrix of gains, losses, and political organisation.

Low-income consumers gain access to durable, branded clothing at a fraction of the cost of new garments. The welfare gain is substantial and immediate, particularly for households that allocate the bulk of their disposable income to non-clothing essentials (IEA-Kenya, 2025). The labour pool that sorts, repairs, transports, and resells the garments is large, predominantly informal, and disproportionately female; its income depends directly on the volume and turnover of imported bales. Domestic producers — both surviving manufacturers and potential entrants — face sharper competition in the lower- and middle-tier segments where *mitumba* concentrates. Whether this constitutes meaningful displacement is empirically uncertain, as Section 6 argued; what is certain is that these firms perceive *mitumba* as a constraint on their growth prospects, and that perception shapes their lobbying behaviour (Standard Media, 2025). The Kenyan state collects substantial customs revenue from *mitumba* — KSh 12 billion annually by recent estimates — but bears costs that do not appear in trade statistics: pollution control, riverine clean-up, transport-network maintenance, and waste-management failures (HapaKenya, 2025). The fiscal balance is not obviously favourable once externalities are accounted for. A fifth constituency, often omitted from domestic discussions, comprises the external actors — the US Trade Representative, the SMART lobby, and the fast-fashion brands and exporters whose discards constitute the upstream supply — whose interests in the continuation of the trade are organised, well-resourced, and decisive at moments such as the 2018 AGOA review. Reading the trade through this distributional lens has two analytical payoffs. It dissolves the binary "good or bad?" question into a more useful question concerning who benefits, who bears the cost, and at what margins. And it forecloses the comforting assumption that some policy intervention can yield a Pareto improvement. Restriction transfers resources from consumers and traders to (potential) domestic manufacturers; permission transfers resources from the latter to the former. There is no neutral position, and any policy stance — including the status quo — represents a choice about who bears the cost.

Environmental injustice and the Dandora cascade

The dimension of the trade that has drawn the most attention in recent years is environmental, and the underlying mechanism is direct. A substantial fraction of the bales arriving in Kenya consists of garments that cannot be resold: damaged, soiled, made of low-grade synthetic blends, or culturally unsuitable for the local market. Estimates of the unsalable share vary considerably and are politically contested. Buyers and field researchers report that as much as 50 per cent of a bale may be unwearable on opening, while industry-aligned reports place the figure as low as 2 per cent (Clean Up Kenya, 2024). Applying the criteria of Section 3.3 — methodological transparency, independence from material interest, temporal proximity, and convergence with other independent estimates — the article favours the higher range. The Environment for Development Initiative (2025) places the share at 20 to 50 per cent, a range consistent with most independent reporting and well above the figure favoured by industry associations. Whatever the precise number, the absolute volume of textile waste generated by the trade is substantial.

The Changing Markets Foundation (2023) has documented systematic flows of low-grade synthetic clothing from Europe to Kenya, much of it dumped, landfilled, or burned upon arrival, in a pattern its report characterises as the "stealth export of waste plastic clothes." Greenpeace Africa (2025) has documented the textile-waste crisis across East and West Africa, identifying a broader pattern in which the geography of fast-fashion overproduction is offloading downstream environmental costs onto receiving countries with limited capacity to manage them. In Nairobi, the visible epicentre of this crisis is the Dandora dumpsite. Established in the late 1970s with World Bank financing as a controlled landfill, Dandora long ago exceeded its design capacity. It now receives upwards of 2,000 tonnes of unsorted municipal and commercial waste daily, including a substantial flow of textile waste from *Gikomba* and surrounding markets (COSH!, 2025). The site spans roughly 30 acres on the city's eastern edge, and the adjacent informal settlements — *Korogocho* among them — are home to communities directly exposed to the resulting air, water, and soil pollution (Opiyo, 2015). The Environmental Investigation Agency (2026) has documented the cascade. Synthetic fabrics burn to release toxic smoke and particulate matter, fragment into microplastics, and leach chemicals into the Ngong, Nairobi, Athi, and Sabaki river systems, which together discharge to the Indian Ocean. Recent rehabilitation efforts under the Nairobi River Regeneration Programme have begun to address the worst of the riverine contamination, but the structural pressure of new arrivals continues unabated (Nairobi Rivers Commission, n.d.).

The human costs of this concentration are substantial. *Korogocho*, one of the largest informal settlements in eastern Nairobi, sits directly adjacent to Dandora, and its residents are among those most directly exposed to the

dumpsite's environmental burdens. Respiratory illness, skin conditions, and water-borne disease are widely reported, and waste-pickers — many of them women and children — work without protective equipment in conditions that combine fire, sharp objects, and toxic exposure (COSH!, 2025). The same population is, in a striking irony, often dependent on *mitumba* itself for affordable clothing: the trade that contributes to their environmental burden also clothes their children. From an international relations perspective, the trade exemplifies what scholars of global environmental governance have termed environmental injustice — the systematic displacement of waste burdens from wealthier jurisdictions, where consumption is concentrated, to poorer ones, where regulatory and infrastructural capacity is weaker (Menjíbar Reynés, 2025). The garments arrive as commerce, but a significant fraction of them effectively functions as waste, and the cleanup costs fall on Kenyan municipalities and Kenyan communities. None of this should obscure the agency of Kenyan actors in handling the stream. Field research has documented the sophistication with which African second-hand clothing markets sort, redistribute, and repurpose garments, including by extending their useful life through tailoring and resale across the East African region (Hansen, 2014). But the capacity of local actors to capture value from imported bales depends on the composition of those bales, and the deteriorating quality profile of incoming material — driven by the rise of synthetic, ultra-fast-fashion garments designed for short use-cycles — is shrinking the share that can be redirected into legitimate use (Greenpeace Africa, 2025). Innovative responses are emerging at the margin. Initiatives such as the "Closing the Loop on Textile Waste" partnership between Kenyan and international firms aim to convert textile waste into regenerated fibre suitable for reincorporation into new garment production, with current capacity to process roughly 36,000 kilograms per month and plans to scale to 100,000 kilograms. These efforts demonstrate that integration into global networks can stimulate creative responses to its own externalities, although they remain modest relative to the scale of the underlying flow. The African Development Bank has estimated that a fully developed circular textile economy could unlock USD 8 billion in annual value across Africa by 2035 and create up to 2.5 million green jobs — a vision technically feasible but politically and infrastructurally distant (Ethical Business Africa, 2025).

Three policy pathways

Contemporary debate over how to govern *mitumba* in Kenya can usefully be sorted into three policy pathways, each redistributing costs and benefits in distinct ways. Figure 3 summarises the trade-offs across four criteria: consumer welfare in the short run, domestic-industry development in the medium run, environmental burden, and political feasibility in the Kenyan context.

Policy-Pathway Trade-Offs

Three governance approaches, evaluated against four criteria

Pathway	Consumer welfare (short run)	Domestic industry (medium run)	Environmental burden	Political feasibility (KE)
1. Quality regulation Pre-shipment inspection, grading standards, port-of-entry oversight to filter unwearable material.	●●● preserved	●○○ marginal effect	●●○ reduced inflow of unwearable goods	●●● no major constituency loses
2. Targeted industrial policy Energy-cost relief, input-tariff cuts, and segment-specific investment in uniforms, workwear, technical textiles.	●●● unchanged	●●●● strongest pathway for revival	●○○ indirect; depends on substitution effect	●●○ fiscal cost is political constraint
3. Extended Producer Responsibility (EPR) Per-kg fees on exporters and fast-fashion brands, scaled to fibre composition.	●●○ marginal pass-through to retail prices	●○○ no direct effect	●●● internalises upstream externalities	●○○ requires international coordination
Composite strategy (1) + (2) + (3) combined: highest welfare, industrial, and environmental scores at higher coordination cost.				

Legend: ●●● strong positive ●●○ mixed / partial ●○○ weak or indeterminate ●○○ structural barrier

Each pathway addresses a different facet; no single pathway dominates across all criteria.

Ratings are illustrative and qualitative; quantitative scenarios developed in Section 8.

Figure 3. Policy-pathway trade-offs: three governance approaches evaluated against four criteria.

The first pathway is quality regulation rather than prohibition. Rather than banning imports, the state can tighten entry conditions: pre-shipment inspection, mandatory cleaning and grading standards, stricter port-of-entry oversight to filter out unwearable material before it enters the domestic stream. The approach preserves the consumer price advantage and most of the labour absorption while reducing the waste-management burden. Its viability depends on the strength of inspection systems and on the capacity to resist the corruption that often accompanies discretionary border enforcement. The second pathway is targeted industrial policy that recognises *mitumba*'s entrenched position. Rather than treating *mitumba* and local manufacturing as zero-sum competitors, this approach focuses domestic investment on segments where local production enjoys comparative advantages — uniforms, workwear, school clothing, technical textiles, and emerging value-added segments — while accepting that *mitumba* will continue to dominate everyday casual wear in the medium term. A recent report from the Institute of Economic Affairs has argued for precisely such a coexistence framework, on the grounds that *mitumba* and new clothing serve distinct rather than substitutable market segments (Texfash, 2025). The third pathway places financial and operational responsibility for end-of-life textiles on the upstream actors that profit from their initial sale. Extended Producer Responsibility (EPR) frameworks, increasingly common in waste regulation, would require fast-fashion brands and exporters to fund the management of garments once they leave the consumer's wardrobe (Environmental Investigation Agency, 2026). The intuition is simple enough: those who profit from production should bear the cost of disposal. The implementation challenge is substantial. Harmonising EPR rules across exporting and importing jurisdictions requires international coordination that current trade architectures do not readily support, and Kenyan authorities have so far struggled to translate EPR principles, established under the 2022 Sustainable Waste Management Act, into enforceable obligations on textile-sector imports (Clean Up Kenya, 2024). The three pathways are not mutually exclusive, and a serious *mitumba* governance strategy would combine quality regulation, targeted industrial policy, and EPR-style cost internalisation.

Illustrative quantitative scenarios

To translate the qualitative pathway analysis into transparent orders of magnitude, this subsection develops three illustrative partial-equilibrium scenarios. The exercise is explicitly indicative rather than predictive: it assumes simple linear pass-through, ignores general-equilibrium feedbacks, and uses parameter values drawn from the cited literature. Its purpose is to anchor the policy discussion in numbers that can be reproduced, criticised, and refined as better data become available.

Scenario A: Quality filter at the port of Mombasa. Suppose a pre-shipment inspection regime, paired with stricter port-of-entry enforcement, reduced the unsalable share of imported bales from a midpoint estimate of 35 per cent to 10 per cent. Applied to 230,000 tonnes of annual imports, this would reduce the unsalable inflow from approximately 80,500 tonnes to 23,000 tonnes — a reduction of 57,500 tonnes of textile waste per year, equivalent to roughly 30 per cent of Dandora's current textile-waste loading. The compliance cost, born by exporters, would plausibly be passed through to landed prices at a rate of around 5 to 15 per cent depending on the stringency of the standard. On the consumer side, given a midpoint *mitumba* retail margin of three to seven times wholesale, the pass-through to retail would be considerably smaller in proportional terms, on the order of 1 to 4 per cent. The labour-absorption impact would be modest: the same volume of resalable material would continue to flow through the same trader and tailor networks. The principal beneficiaries would be municipalities and downstream communities; the principal losers would be exporters operating at the low-quality end of the trade. Political feasibility is comparatively high, since no major domestic constituency is materially harmed.

Scenario B: Segment-targeted industrial relief. Suppose the state combined a 50 per cent VAT reduction on intermediate textile inputs (yarn, dyes, machinery), a 30 per cent energy-tariff reduction for designated textile manufacturers in selected segments (uniforms, workwear, technical textiles), and a five-year tax holiday for new entrants. Drawing on World Bank (2015) diagnostic estimates that energy and input costs together account for approximately 40 per cent of Kenyan apparel production cost, the combined intervention would reduce production cost in supported segments by roughly 12 to 18 per cent. At a conservative price-elasticity of supply of 1.0, this would yield an output expansion of similar magnitude in the supported segments — a meaningful but not transformative effect. The fiscal cost would be substantial: assuming a baseline VAT and corporate-tax intake of KSh 4 to 6 billion from the targeted segments, the foregone revenue could be in the region of KSh 2 to 3 billion annually. Against this would be set the long-run revenue gain from sectoral expansion. The exercise

should be read as a sketch rather than a forecast, but it makes clear that segment-specific industrial relief is a finite intervention with a measurable fiscal footprint, not an open-ended commitment.

Scenario C: EPR fee schedule tied to fibre composition. Suppose an EPR regime levied a fee on imported bales calibrated to fibre composition: USD 0.05 per kilogram for predominantly natural fibres, USD 0.20 per kilogram for synthetic-blend dominant, USD 0.50 per kilogram for pure-synthetic content. Applied to a 230,000-tonne annual import volume distributed roughly 40-40-20 across these categories, the fee would raise approximately USD 36 million annually (KSh 4.7 billion) — sufficient to finance a substantial waste-management upgrade for Nairobi and the principal regional markets, and to underwrite the inspection regime envisaged in Scenario A. The pass-through to retail prices would be in the range of 2 to 8 per cent depending on category. The principal political challenge is enforcement: the fee would need to be collected from exporters, which presupposes either a domestic surcharge with re-export rebate or an international agreement that current trade architectures do not yet support. The fee structure could also be designed to incentivise compositional upgrading on the part of exporters, in line with broader EPR principles.

These three scenarios are not mutually exclusive. A composite strategy — quality filtering at the port, segment-targeted industrial relief, and an EPR fee — would generate complementary effects: the quality filter would reduce textile-waste inflow and stabilise the *mitumba* value chain; the industrial-relief package would create selective capacity in segments where domestic production can plausibly compete; and the EPR revenue would finance both the inspection apparatus and the downstream waste-management capacity that the trade currently lacks. The aggregate fiscal cost, on these illustrative parameters, would be approximately neutral once EPR revenues offset industrial-relief expenditure. The most important observation, however, is that the policy debate has historically operated without numbers of even this rudimentary kind. Closing that gap, with progressively better data and progressively more sophisticated modelling, is one of the most useful contributions academic and policy-research communities can make to the *mitumba* question.

The information infrastructure deficit

Any serious *mitumba* governance strategy will require an information infrastructure that does not yet exist. Disagreement over basic facts — the unsalvageable fraction of imported bales, the actual employment supported by the trade, the volume of textile waste entering the Nairobi River system, the income elasticity of demand for second-hand clothing — has allowed competing actors to mobilise sharply incompatible figures in support of their preferred policy positions. Without a credible, independent measurement system, the policy debate will continue to operate in a fog that benefits whoever is best positioned to set the rhetorical agenda (Environment for Development Initiative, 2025). The adjudication criteria set out in Section 3.3 represent one response to this deficit at the level of analysis; the more durable response would be institutional, in the form of an independent measurement body funded outside the channels currently controlled by industry associations and advocacy organisations.

Limitations and a Research Agenda

This article rests on a documentary evidence base. Its claims are derived from published scholarship, official statistics, industry and policy-institute reports, and investigative journalism. The strengths of this approach are that the evidence is traceable, the reasoning is replicable, and the analytical synthesis is transparent. Its limitations are equally explicit, and four warrant direct acknowledgement.

First, the article does not draw on primary stakeholder interviews. The political-economy claims advanced in Sections 5 through 8 — concerning the strategic calculus of importers, the lived experience of women traders, the regulatory practice of municipal officials, the working conditions of waste-pickers at *Dandora* — would be considerably strengthened by primary interview data. A follow-up research design built around semi-structured interviews across the chain (importers at Mombasa, wholesalers at *Gikomba*, retail vendors and tailors at *Toi* and *Kibuye*, municipal waste-management officials, and waste-pickers and community representatives at *Korogocho*) would yield richer mechanism evidence and would permit triangulation against the documentary record that the present article relies on.

Second, the analysis is unable to draw on direct measurement of bale quality. The 20–50 per cent unsalvageable estimate adopted here is reasonable given the criteria of Section 3.3, but the underlying figure remains a range rather than a measured quantity. A graded sampling protocol — drawing bales at the port and at successive points along the wholesale chain, scoring them against a defined quality rubric, and reporting fibre composition, condition class, and unsalvageable share — would establish an empirical baseline against which the existing estimates could be calibrated. Such a study, ideally conducted by an independent body with no material stake in the resulting figure, is a high-priority addition to the literature.

Third, the article does not undertake formal econometric modelling of the counterfactual relationships it discusses. The Frazer (2008) cross-country estimate and the Brooks and Simon (2012) counter-argument remain the principal points of reference. A more recent econometric study using Kenyan household-survey microdata — estimating *mitumba* demand elasticities, substitution patterns between *mitumba* and new clothing, and the welfare effects of price changes — would substantially advance the literature. Likewise, a mass-balance analysis linking import volumes to landfill measurements and incinerator records would generate the kind of measured waste-flow estimates that the present article necessarily approximates. The illustrative scenarios in Section 8.4 are intended as a placeholder for such work rather than a substitute for it.

Fourth, the article relies in part on grey literature and advocacy-aligned reports whose methodological transparency is limited. The adjudication criteria of Section 3.3 attempt to discipline this reliance, but they do not eliminate it. The most informative replacement for this reliance would be a coordinated programme of independent measurement — port-side bale audits, market-vendor income surveys, household consumption studies, riverine waste sampling — conducted by academic institutions, statistical offices, or independent think-tanks operating outside the orbits of both the *mitumba* industry and its critics.

A research agenda follows naturally from these limitations. Five priorities stand out. The first is a multi-site stakeholder interview programme of the kind described above, designed to capture the mechanism-level detail that documentary sources cannot. The second is a port-side bale-quality audit, ideally conducted as a repeated cross-section over twelve to twenty-four months, to establish a measured baseline and detect trends in the synthetic-fibre share of arrivals. The third is a household-microdata study of *mitumba* and new-clothing demand using existing Kenya Integrated Household Budget Survey rounds, with formal elasticity estimates and welfare calculations. The fourth is a mass-balance accounting exercise linking annual import volumes (in tonnes) to documented end-points (resale, repurposing, landfill, incineration, riverine discharge), to test the consistency of competing claims about the trade's environmental footprint. The fifth is a small-scale prototype of an EPR-compatible measurement and fee-collection system, ideally implemented at a single port or wholesale hub, to assess feasibility before any broader regulatory commitment is made. None of these is a substitute for the present analysis; each is a complement that would harden specific claims that this article must, at the level of documentary synthesis, leave at the level of plausible inference.

CONCLUSION

The case of the *mitumba* trade illuminates a broader argument concerning market integration in late-industrialising economies. The standard binary — does integration deliver development, or does it produce dependence? — is too coarse to capture what actually happens when an economy plugs into global flows of goods and discards. Kenya's experience with second-hand clothing demonstrates that integration produces both gains and losses, that those gains and losses are unevenly distributed, and that their distribution is shaped less by the abstract terms of trade agreements than by the interaction of global production patterns, regional preference architectures, and domestic political settlements.

Three conclusions emerge. *Mitumba* has become a structural feature of Kenya's clothing economy rather than a temporary anomaly. The trade absorbs enormous volumes of imported material, supplies the bulk of household clothing demand, sustains a large informal-sector workforce in which women predominate, and generates meaningful tax revenue. Any policy approach that treats it as removable misreads its institutional weight. The political economy of restriction, moreover, is far more constrained than industrial-policy textbooks suggest. The 2016–2018 EAC episode demonstrated that asymmetric trade preferences such as AGOA can effectively foreclose policy options that would otherwise be available, while domestic political settlements determine which

states can absorb the resulting costs. Kenya, with its dependence on AGOA-linked apparel exports and its competitive clientelist politics, sits at the intersection of both constraints. And the environmental dimension of the trade has shifted from peripheral concern to structural one. Any future governance framework must reckon with it. The textile mountains at Dandora are not an unintended side effect of *mitumba*. They are the predictable outcome of a global system that ships its discards downstream.

The most useful framing for Kenya's policy community, accordingly, is not "for or against" but "on what terms." How can low-grade imports be filtered out of the inflow? Where can domestic industrial investment be directed so that it can plausibly compete? How can waste-management capacity be built proportional to the volume of incoming material? How can the upstream environmental costs that current trade arrangements externalise onto Kenyan communities be internalised, even partially? The three illustrative scenarios developed in Section 8.4 indicate that answers to these questions are tractable in principle, that the relevant orders of magnitude are estimable, and that a composite strategy combining port-side quality filtering, segment-targeted industrial relief, and EPR-style cost internalisation is approximately fiscally neutral on illustrative parameters. These are not glamorous policy questions, and they will not be resolved by tariff lines or campaign slogans. They correspond, however, to the actual structure of the problem and offer the most plausible route to outcomes that improve, rather than merely redistribute, the welfare consequences of Kenya's integration into global apparel markets. The deeper lesson, perhaps, is that for an economy in Kenya's position, integration is not a status to be embraced or rejected but a terrain to be navigated. *Mitumba* has been one of the harder pieces of that terrain. It will remain so. The task for analysts and policymakers is to apprehend its contours clearly enough to govern it well — and, where the existing evidence base is insufficient to support that apprehension, to invest in the measurement infrastructure that will allow future analysis to do better than the present one.

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