

To: : Virginijus Sinkevičius – Commissioner for Environment, Oceans and Fisheries  
CC: Mattia Pellegrini; Silvija Aile  
European Commission, Rue de la Loi 200

Brussels, 2 November 2022

**Subject: The revision of the Waste Framework Directive (WFD) – urgent action required to tackle the waste crisis**

Dear Commissioner Sinkevičius,

By formulating the circular economy action plan (CEAP) within the EU Green Deal, the EU expressed its ambition to address the growing amount of waste in our societies and the unnecessary waste of resources, energy and nutrients. However, so far, EU policy has focussed merely on the quantitative increase of recycling, and a reduction of landfilling which, without additional measures, will cause a shift to more incineration. Given the lack of effective measures for waste prevention, it is not surprising that the **amount of waste generated has only increased over the last decade**. The current legislation does not show any clear path forward for waste prevention, e.g. reuse systems lack the necessary infrastructure, and the prevention measures mentioned in Art. 9 of the WFD are not binding. Policy makers often trusted producers to bring forward the needed solutions, however, this approach has failed to deliver on lowering environmental impacts.

**We, the undersigned, believe that with this revision of the WFD, it is high time to tackle the root causes of the increasing amount of waste and resource extraction – i.e. the overuse of resources, overproduction and overconsumption.** The lack of accountability of producers has also played an important role in this development. We must finally move away from ‘an extracting value’ of planetary resources – which brings with it issues like the global resource scarcity crisis and related geopolitical consequences – towards a ‘producing value’ with lower amounts of resources used.

The latest update of the scope of this revision as per the 2023 work programme has left us disappointed. **We, therefore, call for EU policies to match the European Green Deal’s ambitions and narrative.** Intending to achieve carbon neutrality and circularity by 2050, the current rate of 8.6% circularity, calculated by the 2022 [Circularity Gap Report](#), is unacceptable and outright dangerous for Europe’s future. Above all, the transition towards a **circular economy should have resource use reduction at its core**: instead of only closing an ever-increasing loop, we need to reduce the size of material flows. This requires completely reshaping our extraction, [production, and consumption patterns](#). The proposed narrow scope of the revision, merely including food waste reduction targets, improving recycling and introducing EPR for textiles, tackles only a fraction of the waste crisis. The European Commission seems to prefer postponing what is needed today and continues kicking the can down the road.

While we welcome the European Commission’s plans for **food waste reduction**, we want to underline that targets must address the entire supply chain and be aligned with the commitments of the Sustainable Development Goal (SDG) 12.3 and achieve the 50% food loss and waste reduction target by 2030. We further

would like to stress the need for **quantitative waste reduction targets** for other waste streams: recent [research](#) has shown that current waste prevention plans often confuse prevention with waste management measures. Based on these alarming findings, we call for **legally binding, European-level quantitative targets for municipal solid waste prevention** to be achieved by 2030. It has also become clear that EPR in its current form does not sufficiently incentivise producers to design for durability, reuse, reparability and high-quality recycling. We, therefore, encourage the Commission to adopt **reuse targets** since the current measures in the WFD aim at reuse and recycling but show a strong focus on recycling. While we appreciate that many local authorities are showing good intentions, in the absence of a solid European roadmap, local initiatives for waste prevention lack alignment with all concerned actors, hampering local efforts.

## LIST OF SIGNATORIES

### **10 Supporting Members of the European Parliament:**

**Maria Arena** – Group of the Progressive Alliance of Socialists and Democrats in the European Parliament – Belgium

**Cyrus Engerer** – Group of the Progressive Alliance of Socialists and Democrats in the European Parliament – Malta

**Malte, Gallée** – Group of the Greens/European Free Alliance – Germany

**Anja Hazekamp** – The Left group in the European Parliament – Netherlands

**Martin Hojsik** – Renew Europe Group – Slovakia

**Sara Matthieu** – Group of the Greens/European Free Alliance – Belgium

**Tilly Metz** – Group of the Greens/European Free Alliance – Luxembourg

**Grace O’Sullivan** – Group of the Greens/European Free Alliance – Ireland

**Jutta Paulus** – Group of the Greens/European Free Alliance – Germany

**Marie Toussaint** – Group of the Greens/European Free Alliance – France

### **48 Supporting Organisations:**

A.O. E-Circular

Changing Markets Foundation

Danish Society for Nature Conservation

Društvo Ekologi brez meja

ECOS

Ecoteca

Environmental Action Germany (DUH)

Environmental Investigation Agency

European Environmental Bureau

European Research Institute

Friends of the Earth Europe

Friends of the Earth Cyprus

Fundación Vida Sostenible

Gallifrey Foundation

Global Alliance for Incinerator Alternatives

Green Transition Denmark  
Halte à l'obsolescence programmée (HOP)  
Health and Environment Justice Support (HEJSupport)  
Humusz Szövetség  
Let's Do It Foundation  
NABU (Naturschutzbund Deutschland) e.V.  
No Plastic In My Sea  
Oceana  
Plastic Change  
Plastic Soup Foundation  
Polish Ecological Club Pomeranian Branch  
Recycling Netwerk Benelux  
Rethink Plastic Alliance  
Retorna  
Rezero  
RREUSE  
Runder Tisch Reparatur e.V.  
SAFE Safe Food Advocacy Europe A.S.B.L.  
Sciaena  
SREDINA - Association of Citizens  
Surfrider Foundation Europe  
Sustainability Network for Standardisation  
The Restart Project  
Všl "Žiedinė ekonomika"  
Zelena akcija / Friends of the Earth Croatia  
ZERO - Association for the Sustainability of the Earth System  
Zero Waste Alliance Ireland  
Zero Waste Europe  
Zero Waste Germany e.V.  
Zero Waste Kiel e.V.  
Zero Waste Latvija  
Zero Waste Montenegro  
Zero Waste Society

