



# Feedback to the proposal for a targeted revision of the Waste Framework Directive

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# Zero Waste Europe's feedback to the proposal for a targeted revision of the Waste Framework Directive (2023/0234 (COD))

## Strengthen the provisions on food waste and textiles

ZWE welcomes the proposal for a targeted revision of the Waste Framework Directive, presented on 5th July 2023, and the introduction of reduction targets for food waste and Extended Producer Responsibility (EPR) for textiles. However, we would like to highlight some limitations of the proposal in terms of ambitions and scope.

## Align the proposed food waste reduction targets with the UN 2030 Agenda

While the introduction of food waste reduction targets is a significant step towards the sustainable management of our resources, the targets proposed are at odds with previous commitments and SDG 12.3. Strengthening the target in this revision while keeping the door open for further ambition in the next revision as well as expanding the targets to primary production is therefore paramount. This will also require revising the [EU methodology for measuring food waste](#).

- Adjusting the targets proposed under Article 9a, paragraph 4 a and b to honour previous commitments: the proposed targets of a 10% reduction for processing and manufacturing and 30% (per capita) for retail, restaurants, and households, in comparison to the amount generated in 2020, are misaligned with previous commitments. Already in [2012](#), the European Parliament called on the Commission to take action to halve food waste by 2025 and repeated this call in [2017](#) (50 % by 2030

compared to the 2014 baseline) and [2020](#). In [2016](#), the EU-Member States confirmed their commitment to achieving SDG 12.3 through a range of initiatives and support of the EU and Member States for halving global food waste by 2030 was confirmed again in 2022 with the adoption of the [Kunming-Montreal Global Biodiversity Framework](#). After all those commitments from policy makers, it is disappointing to see the low ambition in the presented proposal as well as the slow progress in the member states towards reducing food waste. Given all the delays in setting binding reduction targets, it will be increasingly difficult to achieve SDG 12.3 by 2030 and only a concerted effort across the whole supply chain can put the EU back on track.

The Impact Assessment considered different policy options including option 3 (50% at retail and consumer level; 25% in processing and manufacturing; and 10% in primary production), however, the Commission opted for option 2, with the justification that it was 'proportionate and feasible' given the limited progress made by member states thus far. However, some [front-runner countries](#) have already established food waste prevention strategies that can lead the way and countries like Romania, the Netherlands, Luxembourg, and Estonia showed support for the introduction of legally binding targets for member states to reduce EU food waste by 50% from farm to fork by 2030. There are good reasons for member states to support ambitious measures despite the effort they would require as the economic impact of food waste is immense: [EU FUSIONS](#) estimated the cost to EU countries of food waste at €143 billion. Halving food waste from farm to fork could therefore save roughly €71 billion.

We therefore propose to increase the targets to:

(Article 9a, paragraph 4)

- (a) reduce the generation of food waste in processing and manufacturing by **50%** in comparison to the amount generated in 2020;
- (b) reduce the generation of food waste per capita, jointly in retail and other distribution of food, in restaurants and food services and in households, by **50%** in comparison to the amount generated in 2020.

In order to ensure fairness of the burden across countries, reduction targets should ideally be calculated for a 50% reduction in the EU as a whole and then at the national level in kg per capita rather than expressed as a percentage. This way, achievements can be fairly accounted for.

- Setting a target for the whole supply chain and updating the methodology for measuring food waste: The Champions 12.3 coalition, an international coalition of executives from governments, businesses, and civil society leading global food waste action, recommends to interpreting the SDG 12.3 target as a 50% reduction in all food loss and waste from farm to fork, including 'food losses' (i.e. pre-retail food waste). The food waste measured under the scope of the EU delegated decision found that in the primary production sector, 6.2mt or 11% of total food is wasted. However, food left unharvested or

ploughed back into the fields on-farm is currently excluded from this measurement. According to [WWF data](#), if this was measured, primary production food waste would account for up to 60% of EU food loss and waste, highlighting the great potential of food savings at primary production. Putting the focus on retail and consumer food waste could also risk creating perverse incentives for food waste to be pushed onto primary producers. We therefore propose to amend the text accordingly:

(Article 9a, paragraph 3a -new)

***The Commission shall, without undue delay and no later than 31 December 2024, review Delegated Decision (EU) 2019/1597 and adopt a delegated act in accordance with Article 38a to revise that Commission Delegated Decision. The delegated act shall lay out the methodology and minimum quality requirements for the uniform measurement of food waste including food intended for human consumption that is left unharvested or used on the farm at primary production.***

- Ensuring a sound revision: the proposed revision clause, under Article 9a paragraph 7, stipulates a revision of the 2030 targets by 31 December 2027. This remains too vague. Providing information about the direction of a revision would help actors to prepare accordingly. We therefore propose to make this revision more binding by amending the text accordingly:

(Article 9a, paragraph 7)

By 31 December 2027, the Commission shall review the targets to be reached by 2030, laid down in paragraph 4, with a view, if appropriate, to **increase** and/or extend them to other stages of the food supply chain, **(particularly to the majority of primary production food waste, including unharvested food and food used on farms, which is currently excluded)**, to consider setting new targets beyond 2030. To that end, the Commission shall submit a report to the European Parliament and to the Council, by a legislative proposal.

- Lastly, to avoid false solutions to the problem, we would like to flag that food and packaging waste have both been on the rise for years and that the [contribution of packaging to saving food is limited](#). Some packaging can in fact increase food waste due to fitting food stuff into standardised packaging.

## Fully apply the polluter pays principle with the proposed EPR scheme for textiles

The overarching goal of the [EU Textiles Strategy](#), 'making fast fashion out of fashion', was not sufficiently addressed with this proposal nor with any of the other related pieces of legislation. While we welcome the introduction of an EPR scheme for textiles that implements the polluter pays principle, the overarching goal must remain to tackle the wasteful system of throw-away clothing that is driven by [overproduction, fast-changing fashion trends, and aggressive advertising](#). In 2023, the European Parliament acknowledged this and called for textile waste prevention targets in [its resolution on the EU Textiles Strategy](#).

Our key demands for an EPR for textiles are outlined in detail in [this joint paper](#) and include:

- Setting targets for waste prevention and management (separate collection, reuse, local reuse, recycling, and fibre-to-fibre recycling), inspired by the newly introduced [EPR for textiles in the Netherlands](#). Moreover, the target for waste prevention for 2030 should be set at 10-15% and based on the volumes placed on the market, taking, e.g., 2020 as a base year since reliable waste data is scarce. Our [recent paper](#) provides further insights and justifications for a target and proposes a textile waste reduction target of 33% by 2040 in comparison to the volumes of textiles placed on the market in 2020;
- Using eco-modulation so that EPR becomes a real price incentive to drive better design instead of a fee producers 'pay to pollute'. Thus far, the focus on cost-coverage hampers the introduction of effective fees. Moreover, footwear and leather products shall not be excluded from ecomodulation;
- Introducing a volume criterion in the calculation of the eco-contribution fees and/or the eco-modulation to tackle fast fashion. This fee would be linked to the number of new items placed on the market by a brand each year. This way, brands would be incentivised to focus on quality rather than quantity of items placed on the market;
- Adding a fund for change and justice that allocates at least 10% of the EPR fees to reuse (5%) and repair operations (5%) in order to make this sector more profitable and create local jobs;
- Effectively addressing textile exports by ensuring a minimum number of regular inspections before shipment, as well as strict penalties for companies caught exporting waste. It also remains uncertain whether exported textiles that underwent prior sorting and are reusable in theory are reused in practice. The EU should acknowledge that all exported textiles will ultimately become waste and have to be managed sustainably;
- Adjusting the general governance framework of EPR to ensure that all actors are included in the decision-making around the design and governance of EPR schemes and that PROs will not use their position to lobby against environmental policies at national and European levels;
- Ensuring that online marketplaces are not excluded from EPR obligations and are liable in the case of non-compliance with EPR schemes;
- Expanding the scope of EPR beyond the products covered in [Annex IVc](#), and introducing EPR for mattresses and carpets, either in this revision or by setting a date for the introduction. In addition, the focus on 'household' textiles in the Commission's proposal exempts textiles from hotels and hospitals and risks driving these products towards incineration;
- Ensuring the transition period is as short as possible so that the burden of financing the mandatory separate collection, slated for 2025, is not put on municipalities for too long;

- Improving data availability and targeting action by mandating an annual compositional analysis of textile waste in mixed waste. In addition to this, the provisions under Article 22c, paragraph 8,<sup>1</sup> on how to calculate the separate collection rate of textile waste requires some clarification: the proposed method seems to divide the weight of the waste textile in mixed municipal waste by the weight of the separately collected textiles when it should add up the textile waste collected separately and in mixed waste to calculate the denominator. We suggest to clarify this accordingly:

$$\textit{Separate collection rate} = \frac{\textit{separately collected textile waste}}{(\textit{separately collected textile waste} + \textit{textiles collected in mixed waste})}$$

If this calculation is applied, the quality of the data would benefit from more frequent compositional analyses of mixed waste. However, this calculation would not account for mismanaged textile waste. Another option would be to use the weight of textile products made available on the market in a given year in a member state as the denominator, similar to the calculation method for separate collection proposed under the [Batteries Regulation](#) ((EU) 2023/1542).

## Provisions missing from the scope of this revision

ZWE is disappointed about the narrow scope of the [targeted revision of the Waste Framework Directive](#). The proposal does not address issues in need of urgent attention by EU legislators, as outlined in our [position paper](#) and the joint [civil society paper](#) from 2022. Already in our [open letter](#) to the European Commission, supported by 10 Members of the European Parliament, and 47 NGOs, signatories expressed their concerns regarding the Waste Framework Directive revision's very limited scope. We would therefore like to bring the following issues to your attention and urge the Commission to address them in the next mandate.

## Set overall quantitative waste prevention targets

A [recent report](#) by the European Court of Auditors concluded that: '*While there was more emphasis on the circular economy in the programming of the 2021-2027 period, member states can still choose to spend a substantial amount of EU funding on managing waste rather than on preventing it through circular design.*' Moreover, in 2023, the [EEA found](#) that the EU's ambition of doubling its share of material recycled and fed

<sup>1</sup> i: Article 22c, paragraph 8: 'The separate collection rate referred to in paragraph 6, point (c) shall be calculated as the percentage obtained by dividing the weight of waste textile, textile-related and footwear products listed in Annex IVc collected in accordance with paragraph 5 in a given calendar year in a Member State by the weight of such waste textile, textile-related and footwear products that is generated and collected as mixed municipal waste.'

back into the economy by 2030 is unlikely at the current pace. In 2021 only 11.7% of all materials used in the EU-27 came from recycled waste (circular material use rate (CMUR)). The report concludes that: *'Enhanced waste recycling alone will not be sufficient for the EU to achieve the target. Instead, this must be combined with ... decreasing material inputs into the economy by 15%.'*

Research has shown that member states' current waste prevention plans are often limited to [softer measures](#) like consumer awareness-raising campaigns or actually [misinterpreted this concept](#) and instead solely focused on waste management measures such as recycling. Furthermore, waste prevention plans have thus far not led to tangible results as the [EEA's analysis](#) on tracking waste prevention progress revealed. Based on these alarming findings, we call for legally binding, European-level quantitative targets for waste prevention. The recently proposed targets for food and packaging waste reduction already set a precedent in this field. We therefore propose adopting an overall EU-level target of 20% binding reduction of waste generation to be achieved by 2030; and an overall EU-level target of 30% binding reduction of waste generation to be achieved by 2035, in comparison to 2019.

## Set a municipal mixed (residual) waste target

The 2020 EU circular economy action plan aims to halve the quantity of municipal waste not recycled (residual waste) by 2030. According to the [EEA](#), preventing waste generation, especially residual waste, would deliver the greatest benefits for the environment. Over the last 5 years, the amount of residual municipal waste generated each year has stabilised at about 113 million metric tonnes. Reaching the target would mean reducing the amount of residual municipal waste by around 56.5 million tonnes by 2030. The reduction in waste needed to meet the CEAP reduction target requires setting ambitious residual waste measures. We recommend establishing a target to reduce residual municipal waste to less than 120kg/capita/year by 2030 and 100kg/capita/year by 2035. This would be calculated prior to waste entering the stabilisation process or at the point it enters the incinerator furnace.

Setting a target to cap residual waste generation would also address the negative consequences of the landfill target, which pushes waste from landfills to incinerators rather than recycling. A recent [report](#) showed that a large fraction of residual waste is recyclable, and further sorting of this waste would help meet the current packaging and municipal waste recycling targets as well as climate targets.

While such targets may seem ambitious to achieve, many municipalities across Europe have already reached them through our Zero Waste Cities programme. We work with nearly 500 European municipalities committed to becoming zero waste and regularly see municipalities achieving 70–80% recycling and producing [less than 60kg of residual waste per capita/year](#). [These cities](#) provide active case studies on how to successfully create systems that reduce waste at the needed speed. Besides the municipal level, some countries also achieved low levels of residual waste production—for example, [Slovenia](#) reached 132 kg per capita in 2021.<sup>2</sup>

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<sup>2</sup>: Calculation: 489 kg per capita of MSW at 72.2 % separate collection.

These targets guarantee fairness for member states with low waste generation and less advanced waste management capacities, as they are usually perceived as laggards. For instance, in [2020](#), Denmark's municipal solid waste (MSW) production exceeded 800 kg/capita, with a recycling rate of roughly 50%, more than 400 kg/capita of residual waste going to disposal and incineration (D10 and R1). In the same year, Romania only generated 287 kg/capita of residual waste. Yet, according to the EU recycling and landfilling targets, calculated in percentage, [Denmark is among the best performers](#) while [Romania is perceived as a laggard country](#).

To achieve the overall goal of waste reduction, targets for residual waste are indispensable. Policies to reduce residual waste will prioritise reduction, increased reuse and better recycling of materials. Legally binding rules will act as incentives to phase out overpackaging and products that are not recyclable while ensuring investments in reuse systems and high-quality recycling facilities. They will also be a strong driver in improving the separate collection of recyclables and ensure that no more resources are wasted.

### Background to the [Landfill Directive](#):

One of the cornerstones of the Circular Economy Package, adopted in 2018, is the new Landfill Directive. The strategic goals of the new Directive are largely similar to EU policy on landfills defined in 1999. However, a key new element brought about by the new Directive is the landfill minimisation target, which obliges EU member states to limit the amount of municipal waste due to be landfilled to 10% or less of the municipal waste generated by 2035. Although the landfill minimisation target seems to be aligned with the strategic goals of the WFD, the new obligation also generates operational goals that contradict the overarching principles of the EU Circular Economy Agenda. Evidence shows that meeting the target is extremely challenging, and the way it is defined and calculated (in any given year and defined as a percentage) may cause [unwanted consequences](#):

- Firstly, it lacks emphasis on waste reduction, which translates into a paradox: it does not matter how much waste is produced, it only matters that no more than 10% is landfilled.
- Secondly, it pushes decision-makers to invest in waste incineration to minimise landfilling. This creates a lock-in effect, with waste compelled to go to incineration for many years to make those expensive plants profitable, rather than reuse options or recycling. This contradicts the principles and strategic goals of the Circular Economy Package, which gives a clear priority to reducing waste and maximising material recovery.
- Finally, it sends the wrong signal by solely emphasising the negative impacts of one type of residual waste treatment - landfilling - while ignoring GHG emissions and pollution from waste incineration. The circular economy aims at progressively phasing out residual waste in itself and stopping all kinds of disposal.

# Mandate the use of mixed (residual) waste sorting (MWS) systems

Applying sorting systems to mixed (residual) waste prior to thermal treatment and landfilling can significantly contribute to achieving ambitious municipal waste recycling targets as well as Europe's climate targets. Recent reports from the [EEA](#) and the [European Court of Auditors](#) reveal the insufficient progress made by the EU towards achieving a circular economy. The current WFD proposal overlooks the crucial challenges at hand at a time when we need to take more immediate action.

While the priority should be on material recovery from separately collected waste, the transition to a circular economy also requires proper consideration for the management of materials that end up in mixed waste (residual) waste. The compositional studies of residual waste indicate that even with the highest separate collection rates, there are still a lot of potentially recyclable materials in residual waste. This is due to the 'concentration effect' in residual waste, generated from:

- mistakes and imperfections in separate collection resulting in materials erroneously delivered with residual waste; and
- materials not targeted by separate collection; typically, non-packaging plastics, which are often made of valuable rigid polymers but not covered by extended producer responsibility (EPR). They tend to concentrate in residual waste, and together with point 1, make the percentage of plastics in mixed waste comparatively high.

It is estimated that for every tonne of mixed municipal waste sorted before incineration or landfilling, a 10-15% additional contribution to feedstock for recycling may be expected. This could also support Member States in attaining recycling targets. If MWS was deployed at the front of all 'ways of managing' residual waste, almost 10 million metric tonnes of additional waste for recycling could be delivered. Plastics, in particular, show a high removal rate. In addition, a positive effect on GHG emissions reduction from managing mixed waste prior to landfilling and incineration can be expected. MWS of waste that is landfilled or incinerated, could deliver (annual) savings of [39 million tonnes of CO2 in the EU27](#). Extended Producer Responsibility (EPR) schemes can be utilised to finance MWS systems. We recommend

- amending Article 10 of the WFD to [mandate the use of mixed waste sorting systems](#) of a defined quality at the front of all new incineration plants and landfills and those which have been operational for less than ten years;
- introducing a clear definition of 'treatment prior to landfilling and incineration' to the law.

To conclude, separate collection needs to be accompanied by sorting of mixed waste before incineration and landfilling to capture what would be lost otherwise. As a result, material recovery processes that used mixed

waste as a feedstock not only increase the availability of secondary raw materials,<sup>3</sup> they also minimise the amount of recyclable material that is incinerated or landfilled, thus [reducing GHG emissions](#) and making substantial contributions to the Circular Economy objective. Non-recyclable materials should be phased out.

## Remove the R1 formula for incineration

We suggest removing the R1 formula in Annex II of the Waste Framework Directive so that municipal waste incineration is no longer able to be classified as 'recovery' but qualifies as 'disposal'. Currently, waste incineration facilities above a certain level of energy recovery are classified as a recovery operation (R1 - Use principally as a fuel or other means to generate energy) and not under disposal, allowing for preferential treatment. However, R1 incineration causes multiple environmental issues, such as air pollution and residue [toxic bottom ash that has to be landfilled](#), while its greenhouse gas (GHG) emission intensity is above the average EU energy grid (evidence by [Eunomia](#), [ZWE](#), and [Zero Waste Scotland](#)). At a time when the decarbonisation of energy systems makes energy recovery from waste diminishingly relevant, it becomes highly questionable whether R1 incinerators should continue to be classified as recovery. However useful generating energy may be, the extent to which valuable resources are lost during incineration as well as the negative effects of pollution and GHG emissions trump the narrow energy gains. A possible benefit of removing the R1 formula is that instead of energy efficiency/generation, the focus shifts towards improving the performance of incineration in terms of pollutant removal, and in terms of greenhouse gas emissions.

## Revise the definition of recycling

In 2023, the [EEA found](#) that the EU's ambition of doubling its share of material recycled and fed back into the economy by 2030 is unlikely at the current pace. In 2021 only 11.7% of all materials used in the EU-27 came from recycled waste. Therefore, adopting a more granular definition of recycling by distinguishing 'high-quality recycling' and 'closed-loop recycling' would further incentivise retaining the quality of material and using it for the same or equivalent applications for longer.

During the last few years, a broad range of new technologies, acting on the chemical structure of waste, have been pushed under the concept of 'chemical recycling' with a lot of differences in terms of efficiency, GHG emissions, quality of the output and energy requirements. Currently, differences between technologies are not considered and need to be clearly distinguished with a more granular definition under EU law.

Processes like pyrolysis and gasification turn plastics into their basic molecular-level building blocks, i.e. carbon molecules. These chemical reactions result in feedstock, which can be used as fuel or input molecules for refining or cracking processes. The resulting mix of molecules consists of a variety of hydrocarbon products which require further energy and intensive purification before it can be used as a feedstock for polymer

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<sup>3</sup>: see for example: Tomra (2002) The ultimate guide to mixed waste sorting: prioritize plastic recovery and recyclability: [solutions.tomra.com/mws-white-paper](https://solutions.tomra.com/mws-white-paper).

production. Both technologies require a high amount of energy to run, and there is significant leakage of plastic materials as around 53% of the carbon content is lost in the process or turned into fuels in the case of pyrolysis, as recent reports by [Öko-Institut](#) and [ZWE](#) show. Equally, the [leakage of materials from a circular management perspective](#) must be considered. In addition, pyrolysis and gasification are known to generate highly [polluted waste streams](#) and [air contaminants](#). For the above-mentioned reasons, and also in line with [Regulation 2022/1616 on recycled plastic for food contact application](#), these two technologies shall not be recognised as [recycling technologies](#).

We therefore propose to expand the definition of 'recovery' to include '*chemical recovery*', describing an operation converting the polymer structure of waste input into molecules via chemical reactions, such as pyrolysis and gasification.

It is evident that mechanical recycling is more environmentally friendly than chemical recycling and recovery, as demonstrated by [CE Delft](#) and [Ökoinstitut](#). Therefore, the latter techniques should be situated below mechanical recycling in the waste hierarchy. There are increasing concerns about potential competition for plastic waste feedstock. Provided that design for mechanical recycling is prioritised, chemical recycling (and recovery) shall hence only deal with degraded and contaminated plastics that cannot be treated by mechanical recycling. Only rejects from sorting facilities should be used for chemical recycling (and recovery) facilities to ensure this.

We therefore propose to define 'chemical recycling' as;

*'Chemical recycling' means the recycling process modifying the chemical structure of waste input, reprocessing polymer back to monomer and oligomer via techniques such as solvolysis and chemolysis. Chemical recycling should be ranked below mechanical and dissolution recycling in the waste hierarchy. Chemical recycling does not cover pyrolysis and gasification, which result in the conversion of polymers to molecules.*

EU legislation puts upcycling, recycling, and downcycling on equal footing, which is causing a downward spiral toward downcycling and doesn't allow the quality of the recycling process output to be taken into account, as [this study](#) on PET shows.<sup>4</sup> Recycling and downcycling have different channels and values. To ensure that what can be recycled is not downcycled (into lower-grade manufacturing applications, which often cause a loss from the circular stream), it is necessary to define the different types of recycling and place them at different levels within the Waste Hierarchy.

*A definition of 'High-quality recycling' should describe a recycling process ensuring that a product is efficiently and effectively recycled, and the distinct characteristics and quality of the material are preserved or recovered so as to ensure they can be used as a substitute for similar application and re-incorporated in products with the same market value, and allowing further recyclability of the same quality when reaching their end-of-life. Such 'distinct quality' should include, for example, 'fibre-to-fibre recycling'.*

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<sup>4</sup> Eunomia, [How circular is PET?](#), 2022

An additional definition of ‘closed-loop recycling’ would complement the definition above and describe a process in which post-consumer waste is collected and recycled, which preserves the value of the material so it can be used again to make the same product category it derives from with minimal loss of quality or function.’

We proposed to amend the waste hierarchy to introduce these new definitions.

## Facilitate the provision of harmonised data

The current mechanisms in place to facilitate the provision of harmonised data (i.e. current SCIP database + REACH) are not at all supporting non-toxic material cycles, as the recent report, ‘[SCIP Database – Does it enhance transparency on Substances of Concern in a Circular Economy?](#)’, highlighted. For a better-integrated policy approach tackling the traceability of chemicals in products and materials, and eventually, in waste, we propose to mandate that any economic operator responsible for the creation of a product passport pursuant to a delegated act adopted under Article 4 of the Ecodesign for Sustainable Products Regulation (ESPR), provides information on all substances of concern present in those products to the European Chemicals Agency within 18 months of the entry into force of those delegated acts. Considering that economic operators will be responsible for the creation of a product passport pursuant to the ESPR as well as the Packaging and Packaging Waste Regulation, it is advisable to avoid double reporting for those operators and ensure that the ECHA database will be interoperable with the Digital Product Passport requirements.

Moreover, to this end, it will be necessary to introduce definitions of hazardous substances (as defined in Article 3 of Regulation (EC) No 1272/2008) and substances of concern (as defined in Article 2(28) point (c) of the ESPR) that provide clarification about which substances should be considered by economic operators responsible for the creation of a product passport. This would also facilitate the enforcement of the upcoming ESPR and PPWR and better align with the EU interface between chemicals, materials, and waste.

## Improve bio-waste/organics management

Given the poor record of municipal waste recycling in many member states, the Commission recently recommended in its [Early Warning Reports](#) that the improvement of bio-waste separate collection is pivotal since it constitutes an average of 34% of municipal waste. Of grave concern for us is the implementation of mandatory separate bio-waste collection, slated to begin on January 1, 2024. Without proper guidance from the EU or mandatory targets for bio-waste collection, the consequences for many member states will be the introduction of inadequate systems that fail to achieve high quality and quantity of organic waste for recycling. It’s evident that the EU recycling targets of 65% by 2035 will not be achievable without optimised organics collection systems. This represents a lack of governance from the EU; while recycling targets are set EU-wide, the EU omitted to introduce targets for organics collection. Zero Waste Europe regrets that this revision missed the opportunity to address this key issue and that our [joint letter](#), signed by a wide variety of civil society

groups, businesses, waste management companies, and municipal stakeholders, has not been taken into account.

To incentivise the proper collection and recycling of bio-waste, we recommend adopting a binding reduction target on the amount of bio-waste included in mixed/residual waste (i.e., before landfill, incineration, or mechanical and biological treatment). Such a cap should be set at 25 kg per capita by 2030 and 15 kg per capita by 2035 of the maximum amount of bio-waste in mixed/residual waste per year. A target expressed in absolute numbers (kg/capita) would account for contributions from food waste reduction programmes and home or community composting initiatives.

To improve the proper collection and recycling of biowaste in the absence of biowaste collection targets, we recommend at least monitoring the separate collection by mandating an annual compositional survey of collected mixed municipal waste. The proposed compositional analysis for textile waste should therefore be strengthened to include bio-waste. Knowing how much bio-waste is left in mixed waste can help identify hotspots for action and allows for comparisons between municipalities. The costs for a compositional analysis may vary from €500 to €2000, depending on the number of samples, making the financial burden manageable for most municipalities. [Slovenia](#), for example, already mandated annual compositional analysis in 2018.

## Make the WFD fit for the 1.5-degree target and mould it into a Material Framework Directive

In the long run, the next Commission must proceed with a substantial overhaul of the WFD into a Resource/Material Framework Directive. Under the current provisions in the WFD, the EC is obliged to examine data on reuse and prevention to assess the feasibility of quantitative targets for reuse and waste reduction by the end of 2024. The Commission should seize this opportunity to turn the law into a regulatory framework for a circular economy consistent with the 1.5-degree target that lays out a pathway to the continued reduction in raw material consumption across the EU economy, as outlined in a [recent white paper](#) by Eunomia. The new law shall steer the use to which different materials are put to maximise the potential for decarbonisation across the economy as a whole (rather than on a sector-by-sector basis) through the introduction of a materials application hierarchy. The EU is well placed to once again demonstrate global leadership, not only in how waste is managed but also in how we can fundamentally reshape our relationship with natural resources to enable humanity to live well within our collective planetary means.



Zero Waste Europe (ZWE) is the European network of communities, local leaders, experts, and change agents working towards the prevention and elimination of waste in our society. We advocate for sustainable systems; for the redesign of our relationship with resources; and for a global shift towards environmental justice, accelerating a just transition towards zero waste for the benefit of people and the planet. [www.zerowasteurope.eu](http://www.zerowasteurope.eu)



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