



Circular Economy Act

policy recommendations

Position paper

February 2025

zerowasteeurope.eu



Contents

2 Executive summary

4 Circular Economy Act recommendations

4 Our vision

4 1. The missing pieces

4 1.1 Strategic use of EU resources and materials

6 1.2 Safety and health: the EU's competitive edge

7 1.3 Circularity as a horizontal principle for the EU's clean industrial strategy

8 2. The pieces that need improvement in EU waste policy

8 2.1 Addressing the Waste Framework Directive's current drawbacks

9 2.1.1 Revamping Extended Producer Responsibility (EPR) rules

10 2.1.2 Advancing the bio-economy and valorising nutrient-rich bio-waste

2.1.3 Recovering valuable materials: reducing residual waste and preventing resource loss

12 2.2. Increasing the use of secondary raw materials, but not at any cost

12 2.2.1 Qualitative and fair competition for the EU recycled materials market

13 2.2.2 Quality controls for imported recyclate

13 2.2.3. Harmonising EU End-of-Waste criteria (EoW) for quality and safety

14 2.3 Landfill target and its current challenges

Executive summary

The European Union stands at a critical juncture. With six planetary boundaries already breached and a rapidly shifting global economy, **the Circular Economy Act (CEA) should serve as a guiding compass to drive how we consume and produce differently, how we empower communities, and build resilient economies through job creation in circular sectors.** It must promote value preservation and ensure the **strategic use of our resources**, while ensuring a safe and toxic-free transition for workers, SMEs, and citizens.

Key Challenges

The current EU framework faces several critical challenges:

- Circular economy policies prioritising resource efficiency while failing to address the ever-increasing consumption, resulting in a stagnating circularity rate and high import dependency .
- Overlooked human safety and health considerations.
- Secondary raw materials remain more expensive than primary.
- Limited success of Extended Producer Responsibility (EPR) in incentivising better product design and waste reduction.
- Insufficient bio-waste management systems.
- High volumes of residual waste being landfilled and incinerated.

Recommendations

Strategic use of EU resources and materials

Options in the EU's toolbox include:

- Implementing enhanced Carbon Border Adjustment Mechanism (CBAM) with comprehensive material and product coverage.
- Expanding the Emissions Trading System (EU-ETS)/CBAM combination to other impacts of material use, such as air pollution.
- Transitioning to a comprehensive EU tax on GHG emissions covering products and materials.

Safety and health: the EU's competitive edge

- Support ambitious measures from the Chemicals Strategy for Sustainability.

- Promote clean manufacturing and safe material cycles.
- Apply essential eco-design criteria for product safety and sustainability.

Circularity as a horizontal principle for the EU's clean industrial strategy

- Establish circularity as a horizontal principle in the Clean Industrial Deal (CID).
- Create economic incentives for circular business models.
- Prioritise the Waste Hierarchy as a core principle.

Addressing the Waste Framework Directive's current drawbacks

- Revamp EPR as a resource management tool.
- Set binding targets for bio-waste quality and management.
- Mandatory mixed waste sorting systems.

Increasing the use of secondary raw materials, but not at any cost

- Expand recycled content targets beyond plastics.
- Strengthen import standards and quality controls.
- Harmonise EU-wide End-of-Waste (EoW) criteria.

Circular Economy Act recommendations

Our vision

The Circular Economy Act (CEA) should be more than a technical fix for waste — it must serve as a guiding compass within a broader industrial strategy.

A compass for how we **consume and produce differently**, putting forward policies that promote value preservation, and making safe and durable products and secondary raw materials the market's preferred option.

A compass to empower communities and drive social and **environmental justice** while creating jobs and ensuring a safe and **toxic-free transition** for workers, SMEs, and citizens.

It should also be a compass for how we **sustainably manage our resources**. With six planetary boundaries already breached and a rapidly shifting global economy, Europe must take decisive action — not just to protect the planet but to **reduce reliance on imported resources**, build resilience, and therefore **strengthen its competitiveness**.

1. The missing pieces

1.1. Strategic use of EU resources and materials

Current situation

Circular economy policies have thus far prioritised resource efficiency, falling short¹ of addressing our ever-increasing consumption of resources and its adverse effects on the environment.² Despite circular economy efforts, the EU's circularity rate³ has stagnated, and reliance on imported material⁴ remains high.

¹ UNEP. 2024. "Global Resources Outlook 2024." UNEP – UN Environment Programme. February 22, 2024.

www.unep.org/resources/Global-Resource-Outlook-2024.

² *ibid.*

³ "EU's Circular Material Use Rate Slightly up in 2022 – Eurostat." European Commission. Ec.europa.eu.

ec.europa.eu/eurostat/web/products-eurostat-news/w/ddn-20231114-2.

⁴ "Physical Imports and Exports – Statistics Explained." 2025. Europa.eu. 2025.

ec.europa.eu/eurostat/statistics-explained/index.php?title=Physical_imports_and_exports#Import_dependency.

The Draghi Report⁵ noted that multiple obstacles prevent the Single Market from being fit for the circular economy: *‘secondary raw materials are more expensive compared to primary raw materials, and recycling tends to be more expensive than landfilling.’* The report concludes that two key policies designed to achieve the internalisation of externalities — the EU Emissions Trading System (EU-ETS) and the EU Carbon Border Adjustment Mechanism (CBAM) — provide a system for pricing emissions that is *‘easy to circumvent.’*

Likewise, the Competitiveness Compass for the EU⁶ highlights that, to reinforce the CBAM’s effectiveness, *‘the possible extension of scope to further sectors and downstream products as well as possible measures to address impacts on exports of relevant goods’* must be considered to create an international level playing field.

ZWE’s recommendations

To correct these market failures and make secondary materials more attractive while breaking the current high dependency on imports, we propose several options for financial incentives for the use of primary raw materials:

- 1. Enhanced CBAM:** continue in the framework of the EU-ETS and develop a comprehensive database of all imported materials, goods, and services into the EU that are linked to outputs from installations covered by the EU-ETS. The so-called ‘resource shuffling’ issue could be addressed by moving further downstream from raw material to product.
- 2. Broader environmental impact system:** climate change is not the only externality exacerbated by resource use. Thus, the EU-ETS/CBAM combination could be extended to other impacts of resource use, such as air pollution, for which externalities can be reasonably estimated. In addition, border tax adjustment (BTA) would be applied to imports, linked to the emissions associated with the content of products. It could be used more broadly than the CBAM as long as the emissions pricing for greenhouse gases (GHG) is mainly linked to what falls within the scope of the EU-ETS and CBAM.
- 3. Transition to a pure tax system:** a logical extension of the former option would be transitioning from the existing EU-ETS and CBAM combination into a tax on relevant GHG emissions. The introduction of the EU-ETS followed extensive discussions around a CO₂ tax, with the tradeable allowance approach being preferred partly because it allowed for CO₂ pricing ‘at the margin’, while grandfathering⁷ of allowances made its introduction politically acceptable. The fact that the CBAM is intended to foreshadow a reduction in free allowances suggests that the rationale for choosing a trading scheme over a tax is diminished.

⁵ “The Draghi Report on EU Competitiveness.” 2023. European Commission. 2023. commission.europa.eu/topics/eu-competitiveness/draghi-report_en.

⁶ “Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee, and the Committee of the Regions. A Competitiveness Compass for the EU.” n.d. 2025. commission.europa.eu/document/download/10017eb1-4722-4333-add2-e0ed18105a34_en.

⁷ ‘Grandfathering’ refers to the practice of granting existing industries or companies free allowances under the EU Emissions Trading System (EU-ETS) when the system was introduced.

Depending on their design, all three instruments would raise additional revenue for either Member States or EU budgets that could be reinvested in circular businesses. Several EU Member States have already adopted targets to reduce absolute material consumption; however, the plans are not legally binding and lack effective measures to achieve set targets. In response to this shortcoming, we proposed above to introduce effective financial incentives to reduce material consumption while simultaneously starting to define a **legally binding target for material footprint at the EU level** (expressed in tonnes *per capita*) in line with planetary boundaries.

1.2. Safety and health: the EU's competitive edge

Current situation

The EU has been advancing its transition towards a circular economy focusing on resource efficiency and waste reduction/management while overlooking consumer safety and human health. However, these two elements reflect **regulatory and societal concerns** and are **distinctive strengths of European competitiveness** at the global level. Indeed, rigorous safety, environmental health, and human health requirements standards shall stay at the core of EU production and the Single Market, and must not be watered down. **European products stamped with a 'Made in Europe' label should become a symbol of quality and safety**, as well as a key distinction of the EU market as a frontrunner, while also acting as synonyms of brand recognition and leadership.⁸ Eventually, the EU can not only reinforce its position as a leader at the global level, but also ensure economic resilience and a healthier society in the longer term.^{9,10}

ZWE's recommendations

- **Integrating health and safety into the CE Act.** This requires fully supporting ambitious measures from the Chemicals Strategy for Sustainability,¹¹ particularly phasing out the most harmful substances in consumer products, thus allowing safe, longer-term use and reuse. Additionally, the CEA should promote clean manufacturing and safe material cycles by endorsing initiatives such as Safe and Sustainable by Design;¹² and by applying essential criteria from the Ecodesign for Sustainable Products

⁸ 2017 "‘Made in Europe’ Label Could Help EU Competitiveness." 2017. Horizon Magazine. February 28, 2017.

projects.research-and-innovation.ec.europa.eu/en/horizon-magazine/made-europe-label-could-help-eu-competitiveness.

⁹ "We Had a Green Deal, Now Europe Needs a Health Deal." Zero Waste Europe. 2024.

zerowasteurope.eu/wp-content/uploads/2024/03/12Mar24_ZWE-We-had-a-Green-Deal-now-Europe-needs-a-Health-Deal-1.pdf

¹⁰ "Formula for a European Health Deal." 2024. Zero Waste Europe. 2024.

zerowasteurope.eu/library/formula-for-a-european-health-deal.

¹¹ European Union. 2020. "Chemicals Strategy." Environment. ec.europa.eu. 2020.

environment.ec.europa.eu/strategy/chemicals-strategy_en.

¹² "Safe and Sustainable by Design." 2023. Research and Innovation. 2023.

research-and-innovation.ec.europa.eu/research-area/industrial-research-and-innovation/chemicals-and-advanced-materials/safe-and-sustainable-design_en.

Regulation (ESPR)¹³ to guarantee that products are designed with both human safety, health and product sustainability in mind from the outset.

1.3. Circularity as a horizontal principle for the EU's industrial strategy

Current situation

Recent legislative initiatives, such as the EU Net Zero Industry Act (NZIA) and the EU Critical Raw Materials Act (CRMA), aim to address Europe's reliance on critical raw materials — like lithium and rare earth elements — that are essential for clean technologies, including renewable energy systems. However, **under current EU frameworks, net zero technologies like wind and solar do not, by default, integrate circularity principles**; and seem to prioritise recycling (which is still to be defined) when reaching the end of their life. **Reuse, repair, remanufacturing, and refurbishing can significantly reduce the need for new raw materials and reduce waste.**

ZWE's recommendations

Horizontal principle of enhancing circularity in policy proposals and investments arising from the Clean Industrial Deal (CID). This should, for example, include:

- 1. Standards and regulatory frameworks for reuse, refurbishing, remanufacturing, and repair** through e.g. incorporating circularity into product-specific legislation such as ESPR. This legislation should expand to include stringent requirements for repairability, reuse, and remanufacturing, thus going beyond recycling. The Waste from Electrical and Electronic Equipment Directive (WEEE) revision should also address this.
- 2. Economic incentives to circularity and to promote circular business models for industries**, e.g. producing renewable energy equipment. This could involve tax breaks or subsidies for companies engaging in repair, refurbishment, and remanufacturing processes.
- 3. The Waste Hierarchy as a core horizontal principle.**¹⁴

¹³ European Commission. 2023. "Ecodesign for Sustainable Products Regulation." European Commission. 2023. commission.europa.eu/energy-climate-change-environment/standards-tools-and-labels/products-labelling-rules-and-requirements/ecodesign-sustainable-products-regulation_en.

¹⁴ See, for example, the work done by GAIA on the need for a waste hierarchy framework for batteries: www.no-burn.org/wp-content/uploads/2024/10/Zero-Waste-Hierarchy-for-Batteries_EN.pdf.

2. The pieces that need improvement in EU waste policy

2.1. Addressing the Waste Framework Directive's current drawbacks

The current limited revision of the Waste Framework Directive (WFD) has fallen short in addressing some of its pain points, including the lack of action on residual waste generation, the insufficiently granular definition of recycling, and targets on bio-waste collection. In addition, the current Waste Hierarchy is neither granular enough nor enforceable.

Below is a set of recommendations that would help improve the current framework:

- Redesign the Waste Hierarchy to move beyond waste management and prioritise resource preservation.
- Set overall quantitative waste prevention targets.
- Set a municipal residual waste generation target.
- Mandate using mixed (residual) waste sorting (MWS) systems.
- Reclassify incineration as "disposal".
- Revise the definition of plastic recycling.
- Facilitate the provision of harmonised data.
- Improve bio-waste/organics management.

Our detailed position provides more information on each of these points.¹⁵ Below, we expand our analysis specifically on Extended Producer Responsibility (EPR) (2.1.1) and bio-waste/organics management (2.1.2), as we believe the European Commission is likely to prioritise action in these areas in the short term.

¹⁵ "Feedback to the Proposal for a Targeted Revision of the Waste Framework Directive – Zero Waste Europe." 2024. Zero Waste Europe. April 4, 2024.

zerowasteurope.eu/library/feedback-to-the-proposal-for-a-targeted-revision-of-the-waste-framework-directive.

2.1.1 Revamping Extended Producer Responsibility (EPR) rules

Current situation

The current EPR governance framework in the EU has mobilised the funding necessary to finance waste management systems for several waste streams, but has **failed to deliver the incentive to improve product design and prevent waste**.

ZWE's recommendations

- **Integrate EPR into a broader circular economy strategy:** traditionally, EPR has been a waste management tool whose primary role was to finance waste management. However, EPR is today expected to be a key tool to achieve a circular economy; hence, it is increasingly used to support prevention and reuse measures. EPR should be upgraded to a resource management tool and aligned with a comprehensive strategy that links fees to the ESPR and can reduce waste generation.
- **Reform EPR fees to drive circularity:** EPR schemes must include a fund for repair and reuse.
- **From ecomodulation to environmental taxation:** given the lack of success of ecomodulation and the need for circular economy drivers to influence the demand side, the EU could consider separating cost coverage of waste management from the economic incentive for producers and consumers in a new approach to EPR. This incentive could be turned into an environmental fee or tax based on a set of environmental externalities to incentivise better design and influence consumer behaviour, thereby serving as a demand-side tool. If ecomodulation continues to be the EU's instrument of choice, the WFD must be amended to allow ecomodulated fees to go beyond cost coverage. This would enable these fees to play a role in incentivising better eco-design, as well as to support reuse and prevention. Moreover, while cost coverage depends on the local situation and should remain a national competency, eco-modulation of fees should be harmonised at the EU level since eco-design and circularity drivers apply equally across the Union.
- **Enlarge the scope of EPR:** currently, many resources are lost due to the lack of separate collection, and taxpayers have to shoulder the costs of managing the waste placed in the market for waste streams not covered by EPR schemes. At the same time as providing the conditions for existing EPR to work, the EU should indicate the intention to include all consumer products under EPR schemes and present an indicative timeline for including all non-perishable consumer products under this policy tool.
- **Prioritise high-performing collection systems:** within the EPR framework, systems like Deposit Refund Schemes (DRS) should be prioritised for their proven ability to improve both collection rates and reuse and recycling outcomes. Even though DRS is mostly used for packaging, EPR systems could be used for other consumer goods, notably WEEE and other products, including Critical Raw Materials.

- **Address governance and power imbalances in EPR systems** by creating an independent EU watchdog to monitor Producer Responsibility Organisations (PRO) performance, ensure accountability and transparency, and engage a broader range of stakeholders (like municipalities) in their governance. A recent report¹⁶ has revealed that Spanish PROs were falsely reporting the real performance of recycling systems for decades to block the implementation of waste legislation such as DRS.
- **Harmonise EPR across borders for transboundary waste management:** transboundary shipments of waste and second-hand products challenge national EPR systems, as exported goods often bypass contributions to EPR schemes in recipient countries. A harmonised EU-wide EPR system could improve data exchange and financial support without weakening national frameworks while covering additional waste streams. A European body could oversee governance, manage inter-state data sharing, and fund waste management for exported second-hand goods. Goods and waste shipped for intra-EU reuse or recycling must undergo a strict monitoring mechanism to prevent waste mismanagement and dumping. This scheme could start at the European level and later expand to other jurisdictions.

2.1.2 Advancing the bio-economy and valorising nutrient-rich bio-waste

Current situation

Many EU Member States struggle to meet the targets for municipal waste recycling. The 2023 Early Warning Reports¹⁷ highlighted the need for improved separate collection of bio-waste, which represents about 34% of municipal waste. Currently, only 26% of food waste is captured in the EU. The introduction of mandatory separate bio-waste collection in 2024 has been insufficient. Moreover, the costs of residual waste management born by municipalities are substantial, with a significant part still being organic waste that ends up in the mixed waste stream. **Without optimised organics collection systems, the EU is not only at risk of failing to achieve its recycling target of 65% by 2035,¹⁸ but also of missing the opportunity to advance the bio-economy and valorise nutrient-rich biowaste as fertiliser, thus reducing dependency on fertiliser imports.**

¹⁶ "Analysis of Compliance with the Targets for the Separate Collection Rate of Plastic Beverage SUPD Bottles up to 3 Litres in Spain." Alianza Residuo Cero, Eunomia Research & Consulting, and Zero Waste Europe. 2024.

zerowasteurope.eu/wp-content/uploads/2024/05/ZWE_May29_Report_Analysis-of-Compliance-with-the-Targets-for-the-Separate-Collection-Rate-of-Plastic-Beverage-Bottles-up-to-3-Litres-in-Spain_ENG.pdf.

¹⁷ "Report from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions – identifying Member States at risk of not meeting the 2025 preparing for re-use and recycling target for municipal waste, the 2025 recycling target for packaging waste and the 2035 municipal waste landfilling reduction target". European Commission, 2023. eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52023DC0304

¹⁸ "Joint Letter on the Need to Include Bio-Waste Targets in the Waste Framework Directive." 2024. Zero Waste Europe. April 4, 2024. zerowasteurope.eu/library/joint-letter-on-the-need-to-include-bio-waste-targets-in-the-waste-framework-directive

ZWE's recommendations

- The EU should provide guidance and set a **binding target for bio-waste in mixed municipal waste** and a **target for the quality of bio-waste entering the recycling process** by setting a control value of 5% for accepted physical impurities. Many Member States are otherwise at risk of implementing inadequate systems that do not yield high-quality and high volumes of organic waste for recycling and valorisation. The LIFE BIOBEST comprehensive guidance for effective bio-waste management in the EU provides more information and recommendations on this matter.¹⁹

2.1.3 Recovering valuable materials: reducing residual waste and preventing resource loss

Current situation

The EU produces 225 million tonnes of municipal waste annually. Yet, 59 million tonnes are incinerated, and millions more are sent to landfills, wasting valuable resources that could be recycled or repurposed. Despite rising recycling rates, 113 million tonnes of residual waste persist each year, highlighting ineffective strategies.

Mixed waste disposal leads to plastics, metals, textiles, and biodegradable materials being burned instead of recovered, increasing CO₂ emissions and reliance on virgin materials. Current incineration and landfill policies fail to support high-quality recycling, reinforcing a linear economy instead of driving resource efficiency.

Unlocking recycling's full potential could reduce import dependence, cut raw material extraction, and create jobs in reuse, repair, and recycling industries.

ZWE's recommendations

- **Set a residual waste generation target of 175 kg per capita by 2030.**²⁰ A legally binding target would **prioritise waste reduction at source**, ensuring that only non-recyclable, non-reusable waste reaches disposal.
- **Mandatory sorting of mixed waste before incineration and landfill.** All Member States must ensure that **recyclable materials are extracted from mixed waste streams** before disposal, following best practices from high-performing circular economy regions.
- Reclassify incineration as "disposal" under the WFD. **Removing incineration's energy recovery (RI) status** would prevent it from being counted as recovery, and it would align the waste policy with EU circular economy targets.

¹⁹ "#LIFEBIOBEST: Comprehensive Guidance for Effective Bio-Waste Management in the EU." 2025. Zero Waste Europe. February 13, 2025. zerowasteurope.eu/library/comprehensive-guidance-for-effective-bio-waste-management-in-the-eu.

²⁰ "Rethinking the EU Landfill Target". Equanimator Ltd for Zero Waste Europe, 2021. zerowasteurope.eu/wp-content/uploads/2021/10/Rethinking-the-Landfill-Target_OCT2021.pdf

- **Introduce strict quality standards for secondary materials.** Set minimum quality thresholds for materials recovered from waste to prevent downcycling and ensure they can be effectively reintroduced into manufacturing and supply chains.

2.2. Increasing the use of secondary raw materials, but not at any cost

2.2.1 Qualitative and fair competition for the EU recycled materials market

Current situation

Draghi's report²¹ shows that the EU circular economy faces economic challenges, as the system still favours single-use, linear, low-cost production. Virgin materials remain cheaper than recycled ones, reinforcing reliance on primary resources. Additionally, product design often overlooks end-of-life treatment, leading to concerns over the quality and safety of recycled materials.²² To overcome these challenges, it is key to **introduce an EU-wide secondary market, thus reducing the dependency towards the rest of the world and enhancing the circular economy.** Legislators have already addressed sectors lagging, such as the plastic sector, with the introduction of recycled content targets. Indeed, these targets have been developed to support secondary raw materials market developments and act as complementary measures to recycling targets.

ZWE's recommendations

Investigate the possibility of introducing recycled content to more materials (going beyond just the plastic sector) with the same requirements, to allow the creation of similar conditions to support secondary raw materials markets and level the playing field between materials.

- Recycled content targets shall be based on **post-consumer waste**, in line with previous decisions from the European Court of Justice.^{23,24}
- When waste occurs, it shall be **treated locally in an environmentally sound manner**, prioritising EU recycle in line with EU legislation defining safety and environmental requirements.

²¹ "EU Competitiveness: Looking Ahead." 2023. European Commission. 2023.

commission.europa.eu/topics/strengthening-european-competitiveness/eu-competitiveness-looking-ahead_en#paragraph_47059.

²² "Investigating Europe's Secondary Raw Material Markets." 2023. European Environment Agency (EEA). January 26, 2023.

www.eea.europa.eu/en/analysis/publications/investigating-europes-secondary-raw-material.

²³ Case C-235/02 – Saetti and Frediani, para. 46–48. eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:62002C00235_SUM

²⁴ Case C-457/02, Niselli, para. 46.

curia.europa.eu/juris/document/document.jsf?text=&docid=49661&pageIndex=0&doclang=EN&mode=lst&dir=&occ=first&part=1&cid=720384

This exercise should prioritise high-value and strategic materials, such as construction materials, metals, electrical and electronic equipment, and textiles.

2.2.2. Quality controls for imported recyclate

Current situation

Imported recyclate often lack consistent quality control, with concerns over hazardous substances in recycled materials (plastics, textiles, paper and biowaste) creating health risks.^{25,26} DG SANTE has raised concerns over insufficient compliance with EU standards, as imported recyclate largely rely on self-declaration without robust control systems, verifiable codes, or monitoring authorities, which causes risks to our health and the environment. This unregulated influx of lower-priced recyclates undermines EU recycling markets,²⁷ creating **unfair competition** and **threatening industry viability**.

ZWE's recommendations

- **Expand recycled content targets to materials beyond plastic**, ensuring they can only be met with recyclate originating from the EU supported by independent verification of recycled content; and expand the coverage of CBAM to new materials like plastic or bulk chemicals. Strengthen import standards with clear shipping codes, origin labelling, and harmonised tariffs or quotas. Adjust fiscal policies by taxing primary plastics and imported recyclate while reducing VAT for EU circular material.

2.2.3. Harmonising EU End-of-Waste criteria (EoW) for quality and safety

Current situation

The market for waste-derived materials (like plastics, biowaste, and textiles) is inefficient²⁸ due to inconsistent definitions of waste-derived materials, presence of hazardous substances, and lack of trust in recycled materials. **Varying end-of-waste (EoW) criteria among and within EU Member States result in inconsistent quality across recycled products**, undermining the (re)circularity of materials at the European level.²⁹

²⁵ Working Group on Food Contact Materials 22-23 January 2024. European Commission, 2024.

food.ec.europa.eu/document/download/9aff9ef8-0fa5-4076-8b77-b38a4f9f117a_en?filename=cs_fcm_wg_20240122_handout_0.pdf

²⁶ "Investigating Europe's Secondary Raw Material Markets." 2023. European Environment Agency (EEA). January 26, 2023. www.eea.europa.eu/en/analysis/publications/investigating-europes-secondary-raw-material.

²⁷ Montag, Andreas. 2023. "Veolia PET Germany to Close Rostock Site on 31.12.2023." Mynewsdesk. Veolia Holding Deutschland GmbH. May 18, 2023. newsroom.veolia.de/pressreleases/veolia-pet-germany-to-close-rostock-site-on-31-punkt-12-punkt-2023-3251854.

²⁸ "Investigating Europe's Secondary Raw Material Markets." 2023. European Environment Agency (EEA). January 26, 2023. www.eea.europa.eu/en/analysis/publications/investigating-europes-secondary-raw-material.

²⁹ *ibid.*

ZWE's recommendations

Establish EU-wide harmonised EoW criteria to ensure a stable market for secondary materials while safeguarding the environment and human health. Sub-proposals include:

- **Input requirements:** remove potentially harmful additives through a defined process, ensuring no additional risks when recycled materials re-enter the economy.
- **Material quality:** EoW status should only be granted to materials meeting quality standards comparable to virgin materials and compliant with EU legislation.
- **Safety compliance and decontamination of plastics:** EoW should be granted once plastic materials are ready for re-melting and direct production use, ensuring compliance with the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) and product-based regulations. All required decontamination steps and environmental impacts should remain within the recycling process.

2.3. Landfill target and its current challenges

Current situation

The 10% landfill reduction target by 2035 presents challenges for advancing the circular economy. While it aims to reduce waste disposal, **the absence of explicit measures to limit incineration reinforces reliance on waste-to-energy (WtE) infrastructure.** This perpetuates a linear waste system instead of fostering waste prevention, reuse, and high-quality recycling.

Furthermore, **defining the landfill target as a percentage of total waste generated allows overall waste volumes to remain high, as increased incineration can offset reductions in landfills.** This undermines efforts to minimise residual waste and fully capture the economic value of materials that would otherwise be lost.³⁰

ZWE's recommendations

A revision of the landfill target should ensure it drives waste reduction, recycling, and resource efficiency by integrating the following measures:

- **Zero landfilling of untreated municipal waste by 2030:**³¹ Member States must eliminate the landfilling of untreated waste to prevent methane emissions and ensure proper material recovery. A

³⁰ "The Landfill Target May Work against the Circular Economy. Should We Minimise Percentages or Tonnes?". Zero Waste Europe. June 4, 2020. zerowasteurope.eu/library/the-landfill-target-may-work-against-the-circular-economy

³¹ "Rethinking the EU Landfill Target". Equanimator Ltd for Zero Waste Europe, 2021. zerowasteurope.eu/wp-content/uploads/2021/10/Rethinking-the-Landfill-Target_OCT2021.pdf

clear, harmonised definition of “treatment” should be adopted, requiring sorting of leftover mixed waste (SLMW) and biological stabilisation before landfilling.

- **Differentiated landfill taxation:** implement progressive landfill taxes to discourage landfilling of untreated waste while incentivising proper treatment before disposal. This approach ensures that landfilled waste has undergone stabilisation and sorting, reducing environmental harm.



Zero Waste Europe (ZWE) is the European network of communities, local leaders, experts, and change agents working towards a better use of resources and the 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



Zero Waste Europe gratefully acknowledges financial assistance from the European Union. The sole responsibility for the content of this material lies with Zero Waste Europe. It does not necessarily reflect the opinion of the funder mentioned above. The funder cannot be held responsible for any use that may be made of the information contained therein.



Authors: Aline Maigret (Head of Policy), Dorota Napierska (Toxic-Free Consumption Policy Officer), Janek Vähk (Zero Pollution Policy Manager), Larissa Copello (Packaging & Reuse Policy Officer), Lauriane Veillard (Chemical Recycling and Plastics-to-Fuels Policy Officer), Theresa Mörsen (Waste & Resources Policy Officer), Joan Marc Simon (Founder)

Editors: Ana Oliveira

Date: February 2025

General information: hello@zerowasteeurope.eu

Media: news@zerowasteeurope.eu

Cities-related topics: cities@zerowasteeurope.eu

www.zerowasteeurope.eu

www.zerowastecities.eu

www.missionzeroacademy.eu

