



How can the Circular Economy Act unlock the potential of EPR ?

ZWE Webinar - October 7th



Circular Economy Act

policy recommendations


Executive summary
February 2025
zerowasteurope.eu

The CEA....

A strategic opportunity for reuse & waste prevention?

Focus is mainly on **downstream measures** to boost competitiveness:

- harmonising the single market for waste (EPR/EoW criteria)
- improving access to high-quality secondary raw materials

 **Waste prevention and reuse are largely absent from the discussion** (for now....)

Current shortfalls of EPR schemes

- EPR schemes mainly focus on **financing waste collection & recycling**;
- **Eco-modulation** of fees provide **limited incentives for upstream waste prevention measures** – such as eco-design, repair, or reuse;
- **EPR paradox**: a system aimed at addressing the waste crisis is at risk of inadvertently **reinforcing the use of disposable products** in a linear economy rather than promoting circularity.



How can EPR be transformed into a strategic lever for waste prevention, repair & reuse?

Break the Single Use Bias

A manifesto supported by a coalition of 36 cities solution providers from across the EU

Campaign for EPR Reform

Ending the era of single-use

European cities and progressive businesses are calling for a reform of Extended Producer Responsibility (EPR) to prioritise packaging waste prevention and reuse.

MANIFESTO

- 1 Producers to fully cover packaging waste costs.
- 2 Introduction of environmental fee to boost reuse and support the circular economy.
- 3 Secure transparent, accountable PRO governance and unified municipal representation.

Beyond Waste Management – EPR to finance circularity

Joint letter addressed to the European Commission, endorsed by 38 organisations

Key demands

- Full cost coverage of a product's end-of-life treatment
- Finance the waste prevention, repair, and reuse stages of a product's life cycle
- Binding targets for waste prevention and reuse
- Define the scope of cost-coverage
- Review the governance of EPR schemes
- Fee transfer mechanism



Why are we here today?

- **Understand the current limitations** of EPR systems in Europe;
- **Learn from cities** about the financial challenges of reducing single-use packaging and transitioning to reuse systems under current EPR schemes;
- **Explore reform opportunities** to make EPR a tool to drive waste prevention, and expand reuse and repair.



Designing EPR

to foster the EU's competitiveness and strategic autonomy

Study
April 2025
zerowasteurope.eu

Our speakers



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Understanding the EPR paradox

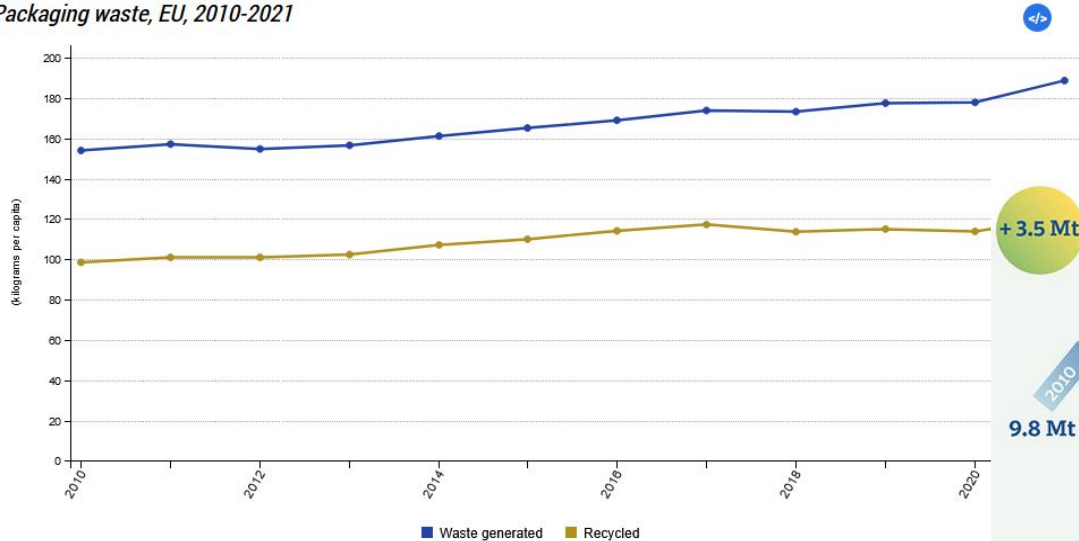
Shortfalls of the current system and the way forward

Theresa Mörsen – Waste & Resources Policy Manager

Waste generation and collection

- Waste generation has increased since the introduction of EPR. Causality or correlation?
- Waste collection and recycling have also increased – yet, at a lower rate compared to waste generation

Packaging waste, EU, 2010-2021



Note: estimated data for 2010, 2011, 2021.
Source: Eurostat (online data code: env_waspac)



Polluter pays principle (1970s)



WFD (2008/98/EC)

‘EPR is a policy principle to **promote total life cycle environmental improvements** of product systems by extending the responsibilities of the manufacturer of the product to various parts of the **entire life cycle of the product**, and especially to the take-back, recycling and final disposal of the product.’



THOMAS LINDHQVIST

‘a set of measures taken by Member States to ensure that producers of products bear financial responsibility or financial and organisational responsibility for the **management of the waste** stage of a product’s life cycle.’

EPR and reuse – reality check

- Despite the waste hierarchy placing reuse over recycling, reuse rates have plummeted in all sectors;
- Single-use packaging is predicted to grow much faster than reuse options;
- The results are growing concerns about pollution, resource use, and associated costs for municipalities/taxpayers.

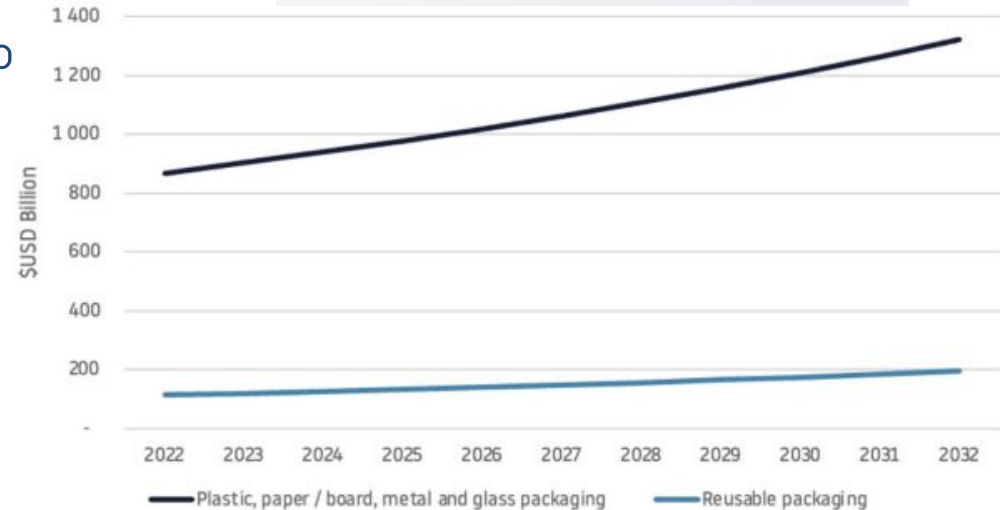


Figure 2 - Global projected market size of plastic, paper / board, metal and glass packaging and of reusable packaging^x

Challenges with current interpretation & implementation

While there is agreement among scholars that EPR is just one tool in the toolbox of waste management, it has considerable power to:

- mobilise funding and exert political influence;
- create an illusion of control;
- lock the system in the status quo of waste management.

This creates what we call the **EPR paradox**:

the system that was created to fix the waste problem becomes a roadblock that stops progress and works against measures to increase collection and reduce waste (e.g., via reuse systems).

Time to shift the focus from waste to circularity?

Polluter pays... yes, but often not the full cost of waste management, and even if they did, would that fix the problem?

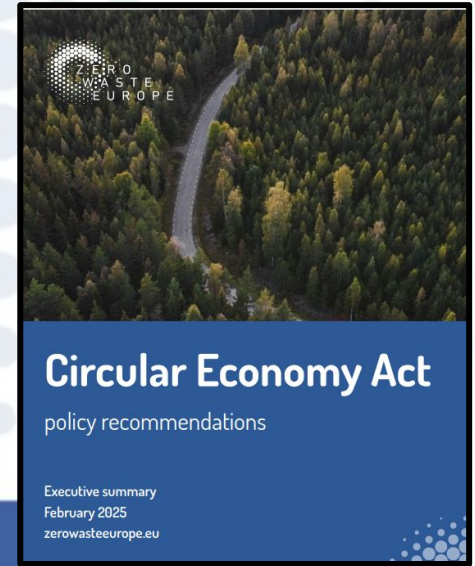
Polluter Pays Principle



Right to Pollute

How to make EPR operate in a way that **boosts sustainability** instead of simply financing waste collection in a mostly linear system?

The way forward for EU EPR



Challenges with current EPR systems



Pillar 1: system optimisation



Harmonised EU
EPR Principles

- ↳ Common definitions and standardised methodologies
- ↳ Harmonised reporting requirements
- ↳ Consistent enforcement mechanisms



European EPR advisory
and monitoring body

- ↳ Central registry and data management
- ↳ Compliance monitoring and enforcement
- ↳ Support to policy, investment, and training

Two-pillar solution

Pillar 2: Circular Economy enabler



Financing Circular
Economy transition

- ↳ Double fee structure (waste management - CE)
- ↳ Financing prevention, reuse, and repair
- ↳ Repair funds and reuse infrastructure
- ↳ Overcoming cost-coverage limitations



Global EPR frameworks

- ↳ Transboundary EPR fees and cooperation
- ↳ Creating global level playing field

Limited cost coverage

- Often, the less costs of collection and waste treatment are covered in a scheme, the cheaper for the PRO (PROs usually pay for the volumes collected);
- EPR systems do not fully internalise the costs, e.g., litter removal and treatment of non-separately collected (mixed) waste.



Double fee structure: EPR as a driver for circularity

	Fee type	Purpose of the fee	Level of calculation/ implementation	Use of revenue
EPR	Waste management fee	Cover costs of waste management necessary to meet collection and recycling targets	National level (reflecting local costs)	Waste collection, treatment, and communication
EPR	Prevention and reuse fee	Cover costs of increasing repair, reuse and refill solutions	National level (reflecting local costs)	Finance skill training, repair & reuse infrastructure, and reverse logistics
Outside EPR (new own resources?)	Ecodesign fee (linked to ESPR)	Incentivise ecodesign & consumer behaviour	Supranational level (harmonised across markets)	EU strategic circular infrastructure/activities, digital infrastructure of data collection & management

Overcoming cost-coverage as a barrier to circularity

- For the fees to be effective drivers of circularity, a **clear definition of their roles is required**;
 - The definition of EPR in the WFD should make it clear that EPR **covers the cost** of the *various parts of the entire use and end-of-life cycle of a product with the objective of providing the best environmental outcome in line with the waste hierarchy*;
 - The proposed ‘*ecodesign fee*’ should become a price incentive—not a cost-coverage tool—to contribute to creating market incentives for circularity.

Building effective EPR systems

- **Clear financial responsibilities**—producers must cover the full cost of managing impact of the products they sell –collection, reuse, recycling, disposal, communication, etc.–.
- **A supportive legal framework**—one that includes prevention, reuse and recycling targets, as well as clear definitions, criteria and methodologies.
- **Good governance and transparency**—so that brands can trust the system, public authorities can enforce it, and recyclers get paid fairly.

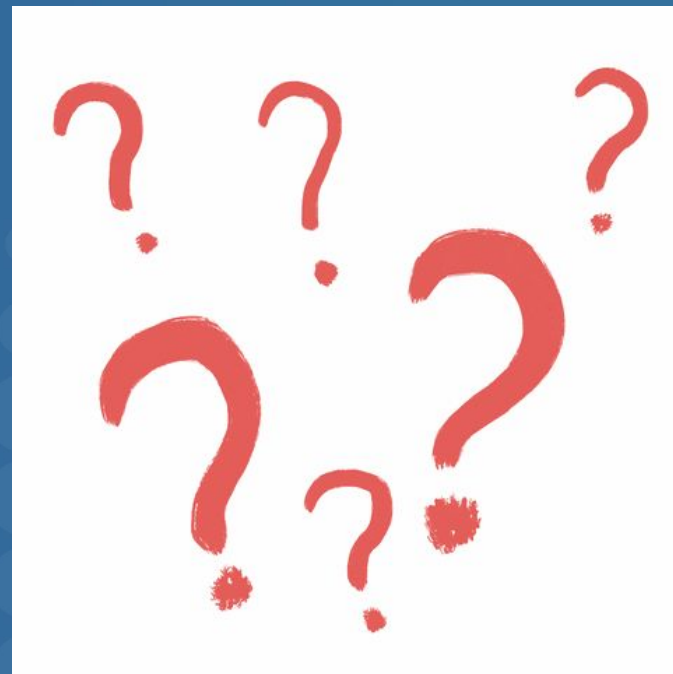
PRO governance and stakeholder inclusion

Protect the role of stakeholders (municipalities, social enterprises from the repair and reuse sector, recyclers) in the EPR system by:

- Guaranteeing a role in the design process of the EPR schemes;
 - e.g., for textiles, the revised Waste Framework Directive (Article 22a (3a)) includes the provision that Member States shall ensure that '*relevant actors are involved in the implementation of the extended producer responsibility scheme.*'
- Ensuring the option for stakeholder representation in the central decision-making & strategy-setting authority that oversees the implementation activities of the PRO and/or in the PRO itself.



Q&A





Panel Discussion

Stakeholder perspectives on the future of EPR



Closing words & call to action

Before to leave..

- Respond to the [EU public consultation of the Circular Economy Act](#) (deadline November 6)
- **Get active at the national level** in the development of EPR, especially textiles, as it will be mandatory by mid-2028!
- Help us amplify our demands. Share the [manifesto](#) & the [letter](#) on your social media.



Thank you !