



20 December 2023, Brussels

## ***No full revision of the Waste Framework Directive without a corresponding impact assessment and stakeholder involvement***

We, the undersigning associations, active in the waste management and recycling sector raise our serious concerns about an extension of the revision of the Waste Framework Directive (WFD) beyond the targeted revision scope proposed by the European Commission.

In July 2023, the European Commission proposed a targeted revision focusing on the environmental sustainability of the food and textiles sectors. These represent the first and the fourth highest pressure categories regarding total use of primary raw materials in the supply chain for consumption in the EU<sup>1</sup> and have not yet fully adhered to the EU waste management hierarchy. As outlined in the Commission's proposal, they represent top resource intensive sectors causing significant negative environmental externalities, where financing and technological gaps have impeded progress towards the transition to a circular economy and decarbonisation.

Specifically on textile waste, mandatory separate collection starting in 2025 aims at reducing cross-contamination by other waste streams, stimulating recycling and moving up its treatment in the waste hierarchy. However, textiles are a waste stream that require special treatment for proper sorting and recycling, necessitating substantial investments in treatment capacities. To create the scale of textile waste processing and recycling that the EU is aiming for, McKinsey estimates the investment need to be 6 -7 billion euros by 2030.<sup>2</sup>

A mandatory Extended Producer Responsibility (EPR) scheme as proposed by the Commission in Article 22a(1), together with other measures to stimulate demand for recycled materials is vital. It will incentivise investments in infrastructure and foster a recycling market. **Completing the WFD revision in the current mandate is essential to ensure EPR implementation across the EU in time to meet the separate collection deadline and to improve sorting for reuse and recycling as soon as possible.** Therefore, we urge co-legislators to adhere to the scope of a targeted revision as proposed by the Commission. Acknowledging that the WFD itself is not the most appropriate instrument to regulate single waste streams, and that an in-depth revision of the Directive is needed, broadening the discussions to the overall WFD now could delay any agreement at all, potentially stalling any progress until after the 2024 elections.

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<sup>1</sup> <https://www.eea.europa.eu/publications/textiles-in-europes-circular-economy/textiles-in-europe-s-circular-economy>

<sup>2</sup> <https://www.mckinsey.com/industries/retail/our-insights/scaling-textile-recycling-in-europe-turning-waste-into-value>

**Especially problematic is Amendment 43 to Article 11 tabled in Parliament, which would lay down the possibility of changing ‘the definition of recycling to include the production of fuel products from materials, including waste’. The ambiguity of such a proposal threatens all ongoing investments in recycling capacities and technologies.** The waste hierarchy outlined in Article 4 clearly categorises Waste-to-Fuel solutions as energy recovery, which is ranked below material recovery (recycling) and above disposal (landfill or incineration without energy recovery). Broadening the definition of recycling to include waste converted into fuels risks watering down the waste hierarchy and could have a high environmental impact if certain wastes then cease to be considered as waste and are seen as fuel, a product. Aside from undermining material recycling, this would mean that these wastes would no longer be subject to the strict requirements of EU waste legislation, including the Waste Shipment Regulation.

**The introduction of mandatory ‘mixed waste sorting systems’ by Amendments 291, 292, 465 and 467 tabled in Parliament is another concern as such measures must first be subject to an impact assessment.** While maximising recycling is strongly supported by the undersigning associations, it is estimated that such a measure would correspond to 60 million tonnes of additional waste sorting infrastructure capacity across the EU. **The costs and benefits of introducing such mixed waste sorting systems across the EU must be assessed for all waste flows (not limited to textiles), looking at the impact on the whole value chain, and considering the relevance of local conditions:**

- As mentioned above, textile waste has particular requirements, including the need for separate collection to prevent cross-contamination from other waste flows and proper management in dry spaces to avoid damage from humidity. This means that the quality of textile waste sorted out from residual municipal waste cannot be suitable for reuse and/or recycling compared to that collected separately.
- Substantial investments (60 million tonnes estimated) will be necessary and will also lead to increased energy and resource consumption. Therefore, a cost/benefit analysis and environmental impact assessment of this proposal must be based on actual figures rather than theoretical data and assumptions. This analysis requires full transparency throughout the value chain, from the input to the sorting plant to the final recycled product.
- The efficiency of this measure will also depend on local conditions (available space, most efficient location, objectives, i.e., targeted waste streams as a function of the local waste management system, etc.). Local authorities and waste management companies must be considered to design the system that delivers the best outcome.

**For these reasons, the undersigning associations strongly believe that the scope of this revision must be tailored to the available time before the end of the mandate, and to the scope of the preparatory work carried out by the European Commission, including the impact assessment and public consultations.**



**CEWEP** (Confederation of European Waste-to-Energy Plants) is the European umbrella association of operators of Waste-to-Energy plants (WtE, waste incineration with energy recovery). They fulfil a hygienic task by treating the residual, non-recyclable waste.

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**EuRIC** represents the recycling industry at a European level. Gathering the vast majority of national recycling federations from EU/EEA Member States, the Confederation represents about 5,500+ recycling companies – from market leaders to SMEs – generating an aggregated annual turnover of about 95 billion € by treating various waste streams such as household or industrial & commercial waste including ferrous and non-ferrous metals, end-of-life vehicles (ELVs), electronic waste (WEEE), packaging (paper and plastics), end-of-life tyres or textiles.

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**FEAD** is the **European Waste Management Association**, representing the private waste and resource management industry across Europe, including 18 national waste management federations and 3,000 waste management companies. Private waste management companies operate in 60% of municipal waste markets in Europe and in 75% of industrial and commercial waste. This means more than 320,000 local jobs, fuelling €5 billion of investments into the economy every year.

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**Municipal Waste Europe (MWE)** represents European public responsibility for municipal waste management. Our members are municipalities and public waste management companies that play a crucial role in providing this Service of General Interest and in delivering a circular economy in Europe. We support the waste hierarchy, resource efficiency and the exchange of good practices to develop environmentally sound and efficient waste management systems in Europe.

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