

Position Paper

A Waste Framework Directive to boost circular design, durability and recyclability of products

This position paper responds to a [public consultation](#) by the European Commission about the revised Waste Framework Directive – Environmental impact of waste management (Ares (2022)577247).

The European Sustainable Business Federation - Ecopreneur.eu – and its membership welcomes the European Commission’s initiative to review the Waste Framework Directive (WFD) to further decrease waste generation and improve waste collection. In principle, we believe that the **EU waste hierarchy** and the **polluter-pays principles** must be at the heart of any European waste legislation. The focus of the review therefore should be on the **prevention rather than the recycling** of waste and turn the current “Waste Framework Directive” into a “Secondary Materials Management Framework Directive”.

As the genuine voice of sustainable frontrunners in Europe - most of them SMEs - we consider an ambitious new directive paramount for **preventing primary resources to be lost at industrial scale**. A meaningful revision of the current WFD should support circular product design, quality (durability) and recyclability. By addressing issues that currently hamper circular models based on repair and refurbishment, reuse, sharing and high-quality recycling, the amending law could **boost the market for secondary** materials which is essential for achieving Europe’s circular economy objectives. The **timely implementation of EU waste legislation** across Member States is critical to enable the sector to achieve a single market for waste and best waste management practices.

Ecopreneur.eu therefore advocates a forward looking and ambitious regulatory framework for waste prevention and better resources management. To achieve these goals, we call on the European Commission to consider the following policy instruments and regulations:

- 1) Adopt **common definitions** for end-of-waste, recyclability, circularity and circular design: Currently, there is no general definition for recyclability at EU level. The only existing recyclability definition in EU law is for packaging products.
 - To be considered recyclable, a product should be able to be collected for the purpose of recycling and proven at scale
 - ISO 14021 could help reduce false green claims about recyclability
 - Circular objectives like recyclability and durability should be considered as much as the use of recycled content
 - Waste generated in the production process should be considered a raw material
 - The exponential benefits of multiple loops should be acknowledged by a proper definition, considering the reduction of GHGs

- 2) A reviewed WFD must be fully in line with the measures and objectives of the **Sustainable Product Initiative (SPI)**. It should incentivise the quality/durability, reusability and recyclability of a product by rewarding its extended lifespan and value-retention due to enhanced transparency and ecodesign.
- Digital Product Passports (DPP) foreseen under the SPI should include information about both products and packaging, clearly indicating the share of recycled content, hazardous substances and their sources, the compliance standards met, the environmental footprint, as well as instructions about maintenance and repair, available spare parts and upgrades, end- of-life treatment and links to relevant external data sources. The system should be secure and easy to use for SMEs, with the possibility to enter data in their own language in one go by connecting the DPP with other relevant databases.
 - Products and services meeting these requirements should be privileged in calls for public procurement
- 3) Introduce **eco-modulated Extended Producer Responsibility (EPR)** schemes that are harmonised at EU level and designed in a cost-effective way so that additional costs are not passed on to consumers. The absence of sufficient sorting and separate collection schemes often hampers efficient recycling processes and the gradual attainment of mono-streams of secondary materials.
- As a general rule, each EU and national waste management measures must be benchmarked against their CO₂ performance to ensure that it does lead to counterproductive effects on overall CO₂ emissions of the sector
 - Eco-modulation of EPR schemes should be based on a bonus/malus system, whereby companies receive a bonus (lower fee) for products and services that are more circular, while companies with more linear products and services pay a levy (higher fee)
 - Reinforce the polluter pays principle by expanding EPR schemes to other product categories, like textiles, furniture, food waste and oils along with construction and demolition waste
 - EPR requirements and fees criteria must be redefined to expand their scope and cost coverage to include waste prevention
 - Incentivise separate waste collection of used items by introducing minimum requirements for source segregation and separate collection
 - Compensation for “closed-loop” systems, including door-to-door collection and takeback schemes
 - Promote high-quality recycling of waste, avoiding contamination of recyclable waste
 - Improve the enforcement of EPR requirements, especially for products sold to EU customers online
 - Ban landfilling for recyclable products and limit the incineration of waste through higher prices

- 4) Ecopreneur.eu strongly advocates specific **mandatory targets** for waste prevention, reuse and recycling of both products and their packaging:
- Waste prevention targets should apply for industrial and municipal solid waste (MSW), including hazardous waste and biowaste, especially in high impact sectors like textiles, packaging, food (biowaste), furniture, vehicles, batteries and electronics.
 - Binding targets for MSW should be set in the form of a cap of organic content in residual waste before further treatment to drive prevention and collection.
 - We also call for binding quotas for reuse of product packaging and industrial packaging in offline and online trade by 2030. Quotas should be sector-specific and apply for all packaging placed on the EU market.
 - The prevention of packaging waste and the reuse of packaging should be regarded separately and therefore should have their own targets. For instance, an overall packaging waste prevention target of 50% by 2030, which would include 30% to be achieved through reuse could be set.
 - Recycling quotas should refer to the mechanical recycling process. Waste that is recycled in extremely energy-intensive processes such as chemical “recycling” must not be included in the recycling quotas but be considered as incineration.
- 5) **Capacity building, training and education** on circularity and circular design based on information on products, their environmental impact, means of lifespan extension and recyclability, take back schemes and donation are key components to help both companies and consumers avoid, reduce and reuse waste.
- From this perspective, Circular Acceleration Houses should be implemented at the regional level throughout the EU. Funded by the EU and aligned with EU research and support programmes, these hubs would provide comprehensive, easily accessible and aligned support for companies and hence serve as a local facilitator to grow expertise and share best practice of circular business models as economically viable alternative to linear production, purchasing and consumption patterns.
 - For SMEs, regional innovation funds should be created issuing small grants of 5.000 - 50.000 EUR with low administrative and reporting requirements in form of vouchers, as well as other mechanisms providing easy and long-term access.
 - For consumers, funding should be provided for educational programmes to raise their sense for a more responsible behaviour in buying, (re)using and disposing of products, including sorting, repair and reuse, upcycling and recycling.

About Ecopreneur.eu

[Ecopreneur.eu](https://ecopreneur.eu) is the European Sustainable Business Federation of currently seven national associations representing about 3000 sustainable companies - mostly SMEs. A member of the Coordination Group of the European Circular Economy Stakeholder Platform, Ecopreneur.eu is the only cross-sectoral EU business organisation committed to ambitious measures, rules and regulations for a low-carbon circular economy. We advocate a new economic framework in which sustainability is promoted, the environment respected, and ecological principles are followed. Ecopreneur.eu and our members bring concrete experience from pioneering companies into the political debate, show best practice examples and represent the needs of green SMEs in a credible way.

Contact

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