

## Position Paper

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

*This position paper is our input for the European Commission's a [public consultation](#) about a revised Waste Framework Directive – Environmental impact of waste management (COM (2023)420).*

Brussels, 27 October 2023 - The European Sustainable Business Federation - Ecopreneur.eu – and its membership of sustainable frontrunners welcome the European Commission's initiative of a revised Waste Framework Directive (WFD) to reduce waste.

While we understand the prioritisation of textiles and food waste, the ultimate goal must be a **EU regulatory framework for any type of waste**, in full alignment with the “**polluter pays**” principle and the **EU waste hierarchy**, to reduce the use of primary resources and stop them from being wasted at industrial scale. This should include chemicals, construction material, oils, furniture, mattresses, carpets, among other products.

From this perspective, a revised WFD must be fully in line with the objectives of the Ecodesign for Sustainable Products Regulation (ESPR), incentivising the durability, reusability and recyclability of all products. To establish an EU single market for secondary materials and promote circular business models based on repair and refurbishment, reuse, sharing and high-quality recycling, a **timely implementation of harmonised EU legislation** is crucial. So is the implementation of **mandatory targets for waste prevention, collection, reuse and recycling**.

To achieve these goals, we call on the European Commission to **prioritize** the following policy measures:

1. Implement **harmonised eco-modulated Extended Producer Responsibility (EPR) schemes** in all EU Member States by **December 31, 2025**.
  - Schemes must be fully aligned with the “polluter pays” principle and include the harmonisation of fees, use of revenues and governance rules of Producer Responsibility Organisations.
  - Eco-modulation of EPR schemes should be based on a bonus/malus system and work as a financial incentive for both producers and consumers, whereby companies pay a significantly lower EPR fee for products and services that are more circular or easier recyclable.
  - EPR requirements and fees must be redefined to expand their scope and cost coverage to include waste prevention, by linking it to eco-design criteria (ESPR), recyclability performance grade and greenhouse gas equivalent (CO2e) for example.
  - A common fee structure should be set for the EU market to avoid price competition between PROs, which otherwise could result in a “race to the bottom” regarding service quality and investments.
  - Eco-modulated EPR schemes must be designed to be highly efficient for SMEs and avoid additional administrative burden.

- EPR fees should only apply to products put on the market for the first time rather than to second-hand products that have been collected and sorted for reuse.
  - Closed-loop systems, including door-to-door collection and takeback schemes, should equally be incentivised and rewarded.
  - Improve the enforcement of EPR requirements, especially for products sold to EU customers online, to avoid free-riding.
  - Introduce a ban on landfilling and the incineration of recyclable products.
2. Adopt **common definitions for end-of-waste, recyclability, circularity and circular design** in EU laws as currently the only definition of recyclability applies to packaging products.
- Circularity aspects like durability and recyclability should be considered as well 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 GHG emissions.
3. To help SMEs put the measures foreseen in the WFD into practice, the EU should **provide capacity building support programmes** on circular design, sustainable business models, supply chain governance and digital data management.

To this end, circular business hubs should be implemented at the EU regional level, funded by and aligned with EU research and support programmes. These hubs should provide companies vouchers of 5.000 to 50.000 EUR per company, allowing them to easily access comprehensive, practical support services locally and without administrative burden.

## About Ecopreneur.eu

Ecopreneur.eu is the European Sustainable Business Federation of currently seven national associations representing nearly 4000 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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