

STATEMENT ON THE COUNCIL NEGOTIATIONS ABOUT THE WASTE FRAMEWORK DIRECTIVE

Brussels, 23 April 2024 - RREUSE welcomes the recognition of social enterprises' role in driving forward the circularity of textiles, expressed by numerous EU ministers during the latest Environmental Council of March 25. Amidst discussions in the Working Party on the Environment to examine a new compromise developed by the Belgian Presidency on the Waste Framework Directive, we highlight two critical concerns from the perspective of social enterprises:

- **Lack of inclusive governance framework**

Setting up a robust and inclusive governance framework within the governance of Extended Producer Responsibility (EPR) schemes is a prerequisite for the future system to work well, and in line with the waste hierarchy. A recent [white paper](#) by researchers from Utrecht University explains how involving all circular value chain stakeholders in decision-making mechanisms, including social economy actors and municipalities, would counter monopolistic behaviour by producers who tend to focus exclusively on recycling. This would therefore be conducive to increase the environmental performance of EPR schemes by driving up reuse rates. According to available information the Council has not addressed this aspect of the future EPR schemes.

→ **RREUSE recommends introducing a clear provision in Art. 22a, paragraph 3 to ensure that all relevant stakeholders are fully involved in the decision-making mechanisms of EPR schemes, in line with the European Parliament's Report.**

- **Cost-coverage for social reuse operators**

Proposals to impose EPR fees on social economy actors engaged in textile reuse are deeply concerning. Such measures would run counter to the environmental objectives at the basis of the whole concept of Extended Producer Responsibility. Requiring social reuse operators to contribute to the EPR scheme would be a major distortion of the polluter pays principles. Instead of being financially supported for the costs that they incur in carrying out their reuse activities, reuse operators would be forced to pay a contribution for clothes they did not produce themselves. Paradoxically this would mean that reuse operators would be required to pay for the overproduction generated by fast fashion brands. Furthermore, introducing a similar proposal without a proper impact assessment also raises major concerns due to the risk of unintended effects.

→ **RREUSE strongly recommends rejecting the idea that social reuse operators should be subject to the payment of EPR fees. The proposed amendment to Art. 22a, paragraph 6, should be deleted. The Council should revert to the Commission's original proposal.**

"We welcome the swift progress made in the negotiations and urges the representatives from the Member States to translate the Ministers' resounding support for waste hierarchy and the role of social enterprises in textile EPRs into the Council's General Approach on the Waste Framework Directive," said **Edoardo Bodo, Environment Policy Officer at RREUSE.**

Notes to editors:

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RREUSE is the international network of social enterprises active in re-use, repair and recycling. The 1,100 social enterprises in RREUSE network provide work opportunities for more than 110,000 employees, volunteers and trainees, the majority of whom face barriers in the mainstream labour market. Every year they collectively collect 1,2 million tonnes of goods with the intention of reuse. In 2022 alone, social enterprises in RREUSE network collected over 360,000 tonnes of textiles and created 20-35 local, inclusive, jobs per 1,000 tonnes.