

REVISED WASTE FRAMEWORK DIRECTIVE MARKS A TURNING POINT IN THE RECOGNITION OF CIRCULAR SOCIAL ENTERPRISES

Brussels, 20 March 2025 - As EU co-legislators have reached an agreement on the targeted revision of the Waste Framework Directive (WFD), RREUSE celebrates the recognition of social enterprises' role in the management of used and waste textiles through different provisions that will be essential for the social and circular sector in the Directive's implementation.

The final text includes several promising provisions for future Extended Producer Responsibility (EPR) schemes for textiles. Notably, we welcome the specific provisions for Social Economy Entities (SEEs), which allow SEEs to:

- Maintain and operate their own separate collection points;
- Receive equal or preferential treatment in the setting of collection points;
- Retain collected textiles without being obliged to hand them over to Producer Responsibility Organisations (PROs);
- Participate in EPR schemes without being refused by PROs.

We also welcome the broad scope of activities to be covered by the EPR schemes. The final text includes references to harmful commercial practices that fuel fast and ultra-fast fashion.

"If used and implemented well, the provision allowing Member States to link the level of EPR fees to companies' commercial practices is a big step toward tackling the excessive generation of textile waste. However, regrettably, this is only voluntary. We urge Member States to implement it in their national EPR systems" said Marie-Jeanne Gaertner, RREUSE's Environmental Policy Lead.

A major missed opportunity is the lack of waste prevention and management targets in the revised WFD. Targets are crucial to ensure that EPR schemes truly prioritise reuse and do not default to the lower levels of the waste hierarchy. Given the unprecedented crisis facing the textile reuse and recycling sector, of which RREUSE has sounded the alarm over the past months, the timeframe for implementation is also concerning. A 20-month transposition period and a 30-month implementation put unnecessary pressure on an already vulnerable sector.

There is also room for improvement in the inclusive governance of EPR systems. While some progress has been made, the final text remains too vague, by merely requiring that "relevant actors are involved in the implementation of the extended producer responsibility scheme", including social enterprises. We call on Member States to translate this provision into concrete decision-making powers for all actors involved in EPR schemes, in particular social enterprises and municipalities.

Finally, there is a need for caution regarding the proposal to consider requiring a financial contribution from commercial reuse operators in the Commission's future evaluation of the Directive in 2029. Such a practice could be a major distortion of the polluter pays principle and it would be essential to carefully assess the desirability and feasibility of such a requirement in each Member State.

We are optimistic that the European Commission will build upon the above-mentioned positive provisions when developing harmonised criteria for EPR schemes in the Circular Economy Act or other new EU initiatives related to the circular economy.

For more information, please contact Marie-Jeanne Gaertner, Environmental Policy Lead, at marie-jeanne.gaertner@rreuse.org



**Co-funded by
the European Union**

Co-funded by the European Union. Views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union or the European Commission. Neither the European Union nor the European Commission can be held responsible for them.

