

European municipalities and cities' recommendations for the Council on the revision of the Waste Framework Directive

Brussels, 5 March 2024

Dear Environment attachés,

European municipalities and cities have extensive experience in providing sustainable waste management. In view of the adoption of the Council agreement on the Revision of the waste framework and the upcoming trilogues, the [Council of European Municipalities and Regions \(CEMR\)](#), [Eurocities](#) and [Municipal Waste Europe](#) put forward the following recommendations:

Scope and definitions

The definition of textiles covered by the EPR scheme should not be restricted to 'household' textiles when referring to used textiles and textile waste. It excludes textiles and textile waste generated in hotels, hospitals, restaurants, offices or schools. The place where the textile waste was generated is not relevant when it comes to producer responsibility and the application of the polluter pays principle.

Recommendation: Remove 'Household' reference in Article 22a paragraph 1 and Annex IVc to broaden the definition of textiles covered by EPR schemes (ENVI report AM 52 and AM 115)

EPR cost coverage

The legislative proposal does not offer comprehensive coverage of the costs to ensure effective and successful textile waste management. First, it omits the costs of necessary communication activities, such as long term and targeted awareness-raising campaigns. This communication work is instrumental and must be mentioned in the list of costs.

Moreover, producers should also bear the costs of collection and treatment of textile waste that remains in the mixed waste stream. This obligation – in line with the application of the polluter-pays principle - is an incentive to producers to communicate efficiently to the consumer about textile waste prevention and recycling.

Recommendation: Include provisions to integrate communication costs (ENVI report AM 61) and costs related to the collection and waste treatment of the textile waste remaining in the mixed municipal waste in article 22a paragraph 4.

Clarification of the role of local authorities in EPR schemes

The successful establishment and implementation of the EPR scheme will be based on inclusive and effective governance. The directive should ensure the involvement of all relevant stakeholders, including local authorities. Cooperation with local authorities should be mandatory to ensure a harmonised organisation of textile waste collection and treatment.

Recommendations:

- *Ensure inclusive and balanced governance for the EPR system with a clear definition of the roles and responsibilities of each stakeholder involved in article 22a paragraph 3 (ENVI report AM 56)*
- *Remove “one or more of the following” in article 22c, paragraph 6, to prevent producers from excluding the participation of local authorities*
- *Add the reference to local authorities in the list of organisations that cannot be excluded in the separate collection system established in the EPR scheme in article 22c, paragraph 10 (ENVI report AM 81)*
- *Include local authorities in the list of entities part of the connected collection points in article 22c paragraph 11 (ENVI report AM 81)*

Transposition and set up of EPR schemes

As explained above, it is crucial to establish the EPR as soon as possible to cover the costs of the set up and execution of mandatory separate collection of textiles, ensuring a swift, fair and effective application of the polluter pays principle. Delayed action will result in considerable financial burden for municipalities and reduced environmental benefit.

Recommendations:

- *Shorten the deadline for the establishment of EPR schemes from 30 months to 18 months in art 22a para 8 (ENVI report AM 67)*
- *Accelerate the implementation of the directive, reducing the transposition from 18 to 12 months (ENVI report AM 114)*



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About

CEMR is the broadest organisation of local and regional authorities in Europe. Its members are over 60 national associations of municipalities and regions from 41 European countries, representing 110.000 public local and regional governments and about 1 million politicians in Europe. Contact person: Axelle Griffon, policy advisor environment and mobility, axellegriffon@ccre-cemr.org

Eurocities is the largest network of European cities. We count over 200 large cities among our membership, representing more than 150 million people across 38 countries, from within and outside the European Union. Contact person: Louise Coffineau, senior policy advisor for environment and climate, louise.coffineau@eurocities.eu

Municipal Waste Europe 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. Contact person: Estefanía Jiménez Puerta, policy officer, estefania.jimenez@municipalwasteurope.eu