



WWF Position Paper

EU waste framework directive revision

November 2023

EU Waste Framework Directive and its revision

The EU Waste Framework Directive, first put in place in 2008, sets out the basic concepts, definitions, principles, and targets related to waste management, including recycling and recovery across the EU.

Following an analysis including stakeholder consultations, the Commission has proposed a [targeted amendment of the Directive](#) in July 2023, with a focus on textiles and food waste. The rationale for its revision was to systematically reduce waste in the two most resource intensive sectors, namely textiles and food.

This paper gives a short overview of WWF Germany's position on the proposed EU targets.

Food Waste

WWF Germany welcomes the European Commission's proposal for EU-wide legally binding food waste reduction targets. The setting of binding targets is a much-needed step to stimulate action by Member States and food businesses across the value chain.

However, we would like to stress that the currently proposed targets of 30 percent per capita reduction for retail and consumption and ten percent for processing and manufacturing are neither in line with previously made political commitments, nor ambitious enough against the backdrop of the ever-progressing climate- and biodiversity crisis. WWF Germany would therefore like to **reiterate the importance of a fifty percent reduction target for food loss and waste from farm to fork by 2030.**

We are particularly concerned about the Commission proposal excluding losses on the agricultural level, the so-called primary production. Losses that occur before, during and after harvesting or livestock rearing make up a considerable amount of food waste across the value chain. A recent global report by WWF UK, "Driven to waste" estimated that as much as 15% of the food produced is wasted already at the farm stage, including during the harvest and slaughter operations.

Similarly, a 10% target for the processing sector is not sufficient against the backdrop of internationally agreed sustainability targets. Overall, the Commission is only taking a half-hearted step in the right direction.

It is particularly disappointing that the Commission falls far short of the UN Sustainable Development Goal 12.3 as well as its own commitments made in the Farm to Fork strategy, where it committed to a reduction of 50 percent by 2030 for retail and consumers and a considerable reduction of food loss and waste across the whole value chain has been made.



To appropriately take into account the different trajectories of Member States, legally binding targets should ensure that all Member States make a fair contribution to achieving the common 50% food waste reduction target by 2030. **We therefore strongly urge the European Institutions to set a target for Member States to achieve approximately the same level of food waste per capita in kg.** In practice, this would mean different efforts, as those already performing better would already be closer to that objective. So far, the commission proposal does not specify, how a fair distribution of front runners and laggards will be achieved.

Lastly, **WWF Germany welcomes the inclusion of both “edible” and “inedible” parts of food items as part of the reduction targets.** This is important as the distinction between the two categories is not always possible and currently considered inedible parts of fruits and vegetables such as potato peels, leaves and seeds have a high nutritional value and therefore a role to play in the discussion around food security.

Textiles

WWF Germany welcomes the commissions’ objective to improve textile waste management in line with the waste hierarchy, especially a focus on waste prevention. Longevity and re-use must become the norm.

Holding producers responsible for the waste their products cause is a necessary approach in limiting externalities. By creating a harmonised EPR system within the European Union with eco-modulation of fees, overall positive effects on the circular economy will result.

Here we believe, it is key that **fees collected are not only used for collection and sorting infrastructure and information tools**, but are also applied to actors establishing circular business models, as well as Research and Innovation.

We also strongly support that sorting operations are undertaken in EU countries prior to exporting outside the European Union. This will prevent the disguised export of waste and contribute to environmental protection in import countries. **Harmonised sorting criteria are a key component in that and must be developed.**

The inclusion of online platforms shipping from non-EU countries is also key as this is currently an increasing volume of textiles consumed in the EU.

We strongly urge the commission to include a separate collection target of at least 50% in line with the positive result of the impact assessment on this. Ideally, the directive **should already make way for a future reuse target and a recycling target.** At least the future development of such should be mentioned.

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