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21 November 2023

**25th MEETING OF THE EEA EFTA FORUM OF LOCAL AND REGIONAL
AUTHORITIES OF THE EEA EFTA STATES**

Brussels

6 and 7 December 2023

**Opinion on the Targeted Revision of the Waste Framework
Directive**

Rapporteur: Beate Marie Dahl Eide

The EEA EFTA Forum of Local and Regional Authorities:

- A. Having regard to the European Commission's proposal for a targeted revision of the Waste Framework from 2008;
- B. Noting the role of the EEA EFTA Forum as a body in the EFTA structure as stipulated in the Decision of the Standing Committee of the EFTA States No 10/2009/SC establishing a Forum of Elected Representatives of Local and Regional Authorities of the EEA EFTA States;
 1. Welcomes the Commission's proposal to revise the Waste Framework Directive from 2008 in a targeted manner, focusing on textiles and food waste. The Forum is fully aligned with the proposal's general objectives of reducing environmental and climate impacts and increasing environmental quality when it comes to both textiles and food waste. The Forum commends the Commission for fighting the proliferation of textile waste through "fast fashion" and notes that 78% of post-consumer textiles are not collected separately and end up in mixed household waste, which is usually burned. This must be avoided.
 2. Underlines that due to the important role that local and regional authorities play in waste management, this targeted revision should be carefully discussed with local and regional authorities at all stages of the legislative process. The Forum takes note of the Commission's emphasis on the importance of setting targets with regard to food waste. When setting such targets, local and regional authorities should be consulted, since they are the governance structures in closest contact with individuals and societies. The Forum underlines that there is valuable information to be gathered

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from local and regional authorities when it comes to waste management that may not be present at the national level or with private waste collectors.

3. Notes that the proposed revision is marked as EEA relevant by the European Commission and will therefore be carefully considered for incorporation into the EEA Agreement by the EU and EFTA experts. The Waste Framework Directive was adopted by the EEA EFTA States, and therefore it is likely that this proposal will be adopted.
4. Supports the European Commission in requiring producers to be responsible for collecting “*all* used and waste textiles, textile-related and footwear products”. This ensures a system where the entire cost lands on the producers, who are defined as polluters. Local and regional authorities agree that citizens do not have the expertise to distinguish between reusable textiles and textiles suitable for material recycling, hence the need for a one-stream solution.
5. Suggests not excluding small businesses from the scheme, as they too need incentives to produce sustainably. Solutions should rather be found that entail a lower administrative burden for them. We must avoid free riders, which lead to underfunding, which in turn increases the risk of municipalities not being able to have their costs covered by the producers.
6. Is encouraged by the inclusion of the “polluter pays” principle in the legislative act. Waste management and increased waste sorting will be expensive. Producers should pay for the negative externalities caused by the products they produce. The Forum recognises that the financial burden must lie closest to the party that can do something about the problem, and hence it welcomes extended producer responsibility (EPR) that covers all costs, including for the communication needed to achieve targets.
7. Underlines the importance of a predictable collection system. When producers are given responsibility for collecting “all used and waste textiles, textile-related and footwear products” we would add “throughout the country, throughout the year”. Citizens will continue to sort their waste regardless of the targets being achieved by the producers. It is important that what the citizens sort and the municipalities collect is actually picked up and handled according to the waste hierarchy.
8. Notes that manufacturers and designers of textiles have a great deal of influence on the environmental impact of their product, and much can be done to avoid problems of recycling at an earlier stage in the process. The Forum underlines the importance of coherent regulation that strengthens the effect of sorting used textiles and textile waste, as well as measures against food waste.