



Brussels, 23 November 2023

To: Members of the European Parliament – Environment Committee (ENVI)

Subject: Joint NGOs and industry call on the Waste Framework Directive revision - expansion of the current scope to improve the environmental outcome of waste management.

The undersigned organisations would like to express their support for a limited expansion of the current scope of the proposal to revise the Waste Framework Directive. While a comprehensive revision of the WFD should be envisaged in the future, we believe that the current revision should address urgent issues related to incineration and landfilling of municipal waste and introduce targets for the collection and recycling of waste oils. This is crucial to deliver on the Green Deal commitments and speed up the transition towards a circular economy. In particular, we call on you to support the following proposals:

1) Mandate sorting of mixed waste to remove recyclable materials (Amendment 291-293)

From 1 January 2030, Member States shall ensure that packaging waste that is not separately collected is sorted prior to disposal or energy recovery operations to remove packaging designed for recycling.

While separate collection rates continue to improve, the revised WFD should require that mixed waste be sorted in order to maximise further extraction of recyclable materials and reduce greenhouse gas emissions from residual treatment as much as possible, given the urgency of staying within the 1.5°C carbon budget. Applying such a requirement at scale across the EU will be important in terms of market efficiency and impact, and a clear signal of intent will provide certainty for businesses and innovators.

2) Waste oil collection and recycling targets (Amendment 300):

No later than 2030, Member States shall achieve the following EU-wide waste oils collection and regeneration targets at national level:

- a) 95 % of the collectable waste oils shall be collected in each Member State.
- b) 85 % of re-refined waste oils of the collectable waste oils in each Member States

The current revision of the WFD is a no-brainer opportunity to promote the circularity of waste oils by setting targets for the collection and regeneration of waste oils, which is the most sustainable waste oils management option. This is a key measure to increase the circularity of waste oils across the EU and significantly reduce CO₂ emissions. In addition, it would enable the consistent and harmonised implementation of the waste hierarchy and the polluter pays principle while improving the environmental outcome of waste oils management.

We hope that you will consider these essential issues in the upcoming negotiations, and we look forward to engaging in constructive dialogue and collaboration.

Yours sincerely,

Co-signed by the following organisations:

[GEIR – The European Waste Oils Regeneration Industry Association](#)

[Zero Waste Europe](#)

[European Environmental Bureau](#)

[ECOS – Environmental Coalition of Standards](#)

[Reloop Platform](#)

[TOMRA](#)

[Minderoo Foundation](#)