



Brussels, 6 October 2025

To the attention of:

Teresa Ribera

Executive Vice-President for a Clean, Just and Competitive Transition

Stéphane Séjourné

Executive Vice-President for Prosperity and Industrial Strategy

Jessika Roswall

European Commissioner for Environment, Water Resilience and a Competitive Circular Economy

Subject: Beyond waste management – EPR to finance circularity

Dear Executive Vice-Presidents Ribera and Séjourné, and Commissioner Roswall,

As a coalition of progressive organisations committed to building a truly circular, fair, and resilient European economy, **we welcome the European Commission's decision to address Extended Producer Responsibility (EPR) within the forthcoming Circular Economy Act (CEA)**. This is a timely and necessary step towards transitioning to more circularity and helping achieve the EU's industrial, economic, and environmental goals.

In this context, we support the Commission's plans to optimise EPR systems by improving harmonisation and reducing the administrative burden for producers across the EU. A more efficient EPR framework would help tackle key challenges such as a lack of transparency, fragmentation, limited oversight, and free-riding. Establishing a European EPR advisory and monitoring body could further ease the administrative load through centralised registration and harmonised reporting while strengthening compliance by coordinating with customs and enforcement authorities.

The envisaged system optimisation will not be sufficient to advance circularity. EPR is one of the main sources of funding for the creation and operation of waste management infrastructure in the EU, however, it currently falls short of contributing to financing more resource-efficient options such as waste prevention, reuse, repair, refurbishment, or remanufacturing. **This lack of funding for non-waste-related circular processes partly explains the limited progress on circularity achieved in the past decade.¹ Waste**

¹ EEA (2025) [Circular Material Use Rate](#)

streams such as packaging or WEEE have been growing at a much faster pace than their collection and recycling rates.²

EPR offers an untapped potential to finance circularity that is key for the EU to increase its resource productivity and strategic autonomy. For example, the EU's new Packaging and Packaging Waste Regulation (PPWR) requires that part of the EPR budget supports prevention and reuse measures—though it fell short of mandating a meaningful funding share. Similarly, in France, the EPR for textiles already allocates a share of the revenue to a reuse and repair fund.

To meet Europe's climate, circularity, and strategic autonomy goals, on top of optimising and harmonising EPR criteria, the CEA must:

- Redefine EPR to include the **full cost coverage of a product's end-of-life treatment**, including littering/clean-up costs.
- **Mandate EPR to finance the waste prevention, repair, and reuse stages of a product's life cycle**, with the amount necessary to achieve the relevant policy goals and targets.
- Introduce binding **targets for waste prevention and reuse** (in addition to recycling) for the relevant product streams to be achieved with the funding of EPR schemes.
- **Define the meaning of cost-coverage for non-waste-related activities** (e.g. prevention, reuse, and repair) in order to delineate the limits of producer responsibility.
- **Review the governance of EPR schemes** not only to ensure harmonisation and oversight of PRO performance but also, in particular, where they address upstream measures, to ensure that municipalities, social enterprises, reuse organisations, and recyclers have a seat at the table in scheme design and decision-making.
- Ensure that EPR schemes include a '**fee transfer mechanism**' to finance the end-of-life treatment of **second-hand products** when those are **exported outside the EU**.

Dear Executive Vice-Presidents Ribeira and Séjourné, dear Commissioner Roswall, increasing resource productivity is crucial for the EU to navigate uncertain times; investing exclusively in waste collection and recycling will be insufficient to meet the challenges of the day. We, therefore, call on you to mobilise the power of EPR to finance prevention and reuse activities.

We are ready to work alongside the Commission to ensure this legislation delivers on its transformative potential.

Yours sincerely,

² Eurostat waste statistics for [WEEE](#) and [Packaging](#)



The signatories

Association of Cities and Regions for sustainable Resource management (ACR+)

Bond Beter Leefmilieu (Belgium)

ConsumAction (Belgium)

Community Resources Network Ireland

Deutsche Umwelthilfe e.V. (Germany)

E-Circular (Republic of Moldova)

Ecologists Without Borders Association (EBM, Slovenia)

Ecopreneur.eu

ECOS

European Environmental Bureau (EEB)

Fair Resource Foundation (Netherlands)

Friend of the Earth (Cyprus)

Friends of the Earth – SPZ (Slovakia)

Gallifrey Foundation (Switzerland)

HERWIN (Belgium)

Humusz Szövetség (Hungary)

NABU (Germany)

New European Reuse Alliance (NewERA)

No Plastic In My Sea (France)

Ocean. Now! (Germany)

Polish Zero Waste Association

Rediscovery Centre (Ireland)

RREUSE

Retorna (Spain)

Réseau Vrac & Réemploi (France)

United Kingdom Without Incineration Network (UKWIN)

Za Zemiata (Bulgaria)

Zelena akcija / Friends of the Earth Croatia

ZERO – Associação Sistema Terrestre Sustentável (Portugal)

Zero Waste Austria

Zero Waste Belgium

Zero Waste Estonia SA

Zero Waste Europe

Zero Waste France

Zero Waste Kiel e.V.

Zero Waste Latvija

Zero Waste Nederland

"Žiedinė ekonomika" / Circular Economy Lithuania