

## End-of-Waste Criteria for Recycling

### Enabling the European secondary raw materials single market for textiles

The revision of the Waste Framework Directive establishes the implementation of extended producer responsibility for textiles as well as the development of end-of-waste criteria for fit for reuse and recycled textiles. Recycled content targets are being considered within the framework of the ecodesign delegated act for textiles to enhance the recycling of textile waste.

While these initiatives will help scale up recycling capacity, it is **essential to ensure their coherence and support growth under a unified European vision, guided by the forthcoming Circular Economy Act**. This coordinated approach will create the necessary conditions to develop a single market for textile secondary raw materials<sup>1</sup>.

We need one Circular Economy (CEA) and not 27 different ones. EuroCommerce supports this new initiative to **address barriers to circular business models, create a well-functioning market for secondary raw materials and establish a Single Market for Waste**.

In this context, transferring secondary raw materials from all Member States to the specific locations of the recycling plants in a competitive manner, avoiding administrative burdens and associated costs to the movement of waste, will be essential. **Defining end-of-waste (EoW) criteria for textiles will be crucial to ensure “ready-to-use” materials are not treated as waste**.

In light of the Joint Research Centre’s (JRC) draft *technical proposals on Developing EU-wide End-of-Waste criteria for textile waste* (February 2025), EuroCommerce would like to share our recommendations on granting EoW status for textiles when the material is ready for recycling.

### End-of-Waste to be granted before recycling

**The End-of-Waste (EoW) for textiles should be granted at the point at which the output material is ready to be used directly in the recycling processes, after the “preparation for recycling” have taken place for both post-consumer and post-industrial waste.**

The “preparation for recycling” follows the sorting for recycling and includes, among others, the following material recovery operations: (i) removal of non-textile parts (eg zipper, buttons, labels, plastic, paper, etc), (ii) removal of textiles with excess printings or sequins, (iii) disassembling and (iv) cutting to various sizes. Preparation for recycling are operations taking place outside of the recycling process and they are mainly done by sorters or waste operators. To ensure the output

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<sup>1</sup> See EuroCommerce position paper on the Circular Economy Act (July 2025).

of the preparation for recycling will undergo a recycling operation, we propose to complement the requirement on **provision of information**, currently being developed by the JRC<sup>2</sup>, **with documentation justifying that the output materials are going to be used in the subsequent recycling process** (including but not limited to a copy of the purchase/transfer agreement, purchase order or invoice).

We believe the status of EoW should be reached after the preparation for recycling operations for the following reasons:

1. **Avoiding barriers of the textile secondary raw materials market by allowing transfer of feedstock between Member State to the recycling plants only located in specific Member States.**

The textile secondary raw materials market in Europe is underdeveloped. The main challenge is the lack of feedstock availability, which is essential for the recycling process. Textile recycling plants need large quantities of feedstock to recycle textile fibres cost-efficiently and achieving this will only be possible by driving economies of scale between Member States.

For example, the south of Europe is specialised in mechanical recycling while the north countries in chemical. Establishing EoW criteria at the EU level is crucial to removing barriers to the transfer of textile materials between Member States. However, **for the EoW criteria for textiles to truly foster economies of scale and support the development of recycling capacity in Europe, the point of end of waste should be granted once the waste becomes a secondary raw material, feedstock, ready to be used in the recycling process.** Otherwise, the material will be continued to be classified as waste, and the EoW criteria will fail to remove existing barriers to developing the secondary raw materials market for textiles in Europe. This is aligned with EEA Report 12/2022, which identifies the lack of specifications, such as the EoW criteria, as a key issue in ensuring the supply side of secondary raw materials markets. The report highlights the development of EoW criteria as a way to improve market functioning (page 7).

2. **Defining EoW after recycling is unnecessary as the material, substance or product resulting from recycling operation is no longer waste, according to the Waste Framework Directive legal framework.**

According to the legal definition in Directive 2008/98/EC on waste (WFD), “recycling” means any recovery operation by which waste materials are reprocessed into products, materials or substances, either for the original purpose or other uses. As a result, **a recycled product is no longer classified as waste. EoW aims to establish this transition earlier, to avoid challenges associated with transferring waste between Member States.**

Therefore, defining EoW *after* recycling is unnecessary as **the material, substance or product resulting from a recycling operation is no longer a waste**, according to the WFD legal framework. In contrast, defining **EoW after “material recovery” operations** (i.e. preparation for recycling) other than recycling **is necessary for the output of such operations to cease to be considered as waste.**

3. **“Preparation for recycling” operations are material recovery operations, and thus comply with the WFD precondition to reach EoW**

The WFD defines as a basic precondition to reach EoW that waste has to undergo a recycling or other recovery operation (Article 6 of the WFD). According to the WFD, preparation for **recycling**

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<sup>2</sup> See JRC technical proposals on *Developing EU-wide End-of-Waste criteria for textile waste* (February 2025 (Draft)).

**operations is considered “recovery operations”, meaning its output meets the precondition required to attain EoW status (R 12 of Annex II of the WFD).**

TABLE 1. CORRELATION BETWEEN RECOVERY OPERATIONS LISTED IN THE WFD AND THE OPERATIONS INCLUDED IN THE PREPARATION FOR RECYCLING PROCESS

Operations included in the Preparation for recycling process	WFD Recovery operations
(i) removal of non -textile parts (e.g. zipper, buttons, labels),	R 12 Exchange of waste for submission to any of the operations numbered R 1 to R 11 (*)
ii) removal of textiles with excess printings or sequins,	
(iii) disassembling	
(iv) cutting to various sizes.	R 12 Exchange of waste for submission to any of the operations numbered R 1 to R 11 (*)

This approach is aligned with other EoW European regulation:

- Regulation 1179/2012 of 10 December, Regulation 715/2013 of 25 July, and Regulation 333/2011 of 31 March (establishing EoW criteria respectively for recovered glass, copper scrap and iron, steel and aluminium scrap) allow the EoW to be granted once input waste has undergone material recovery operations analogous to the preparation for recycling operations that we have proposed for textile waste.
- Spanish EoW for recovered paper and cardboard (Orden TED/426/2020)<sup>3</sup>, establishes the EoW after the paper and cardboard have been separated collected, sorted and pretreated with the aim to be used later in the paper and cellulose industry facilities (recycling).

#### 4. Preparation for recycling operations enhances the value of waste materials by converting them into valuable secondary raw materials.

The preparation for recycling operations are mainly manual operations that imply a high cost of processing. As stated in the JRC draft technical proposals<sup>4</sup>, “*sorting and preparation are essential steps to avoid disruption of the recycling process and to generate a homogenous raw material in line with industrial, market or customer specifications and thus facilitate selling and/or increase the market value of secondary materials*” (page 98). Therefore, **after the preparation for recycling, the output materials have added value and cannot be considered waste but rather a secondary raw materials ready to be directly used in the different recycling technologies.**

#### 5. If EoW is granted after preparation for recycling, the submission of the output materials to the subsequent recycling process would be ensured from a twofold perspective.

The JRC draft technical proposals argue against setting the End of Waste (EoW) point after sorting and preparation for recycling, as these processes produce "intermediate fractions" that still

<sup>3</sup> [https://www.boe.es/diario\\_boe/txt.php?id=BOE-A-2020-5208](https://www.boe.es/diario_boe/txt.php?id=BOE-A-2020-5208)

<sup>4</sup> See JRC technical proposals on *Developing EU-wide End-of-Waste criteria for textile waste* (February 2025 (Draft)).

require recycling. However, **if EoW is set after preparation for recycling, it ensures that these "intermediate fractions" will undergo further recycling.**

- From the perspective of the producer or the importer of each consignment of output materials, with the provision of the documentation justifying the transfer of such outputs stating that they will be used in the subsequent recycling process. According to our proposal above, this documentation would constitute a supplementary information requirement that would accompany the EoW declaration (Section 6.2.5).
- From the perspective of the next holder, with the obligation to retain a copy of the statement of conformity issued by the producer of the output materials resulting from the preparation for recycling operations (and, according to our proposal, the supplementary documentation stating that such materials should be used in the recycling process) for at least 3 years after its date of issue and to make it available to competent authorities upon request. And, moreover, because in the event that the next holder discards those output materials or uses them for any other purpose than for recycling- those materials shall be handled as waste according to current waste regulations.