

Revised Waste Framework Directive – textile waste

Introduction

Our sector welcomes the revision of the Waste Framework Directive (WFD). Retailers and wholesalers are committed to supporting the circular economy and actively work towards reducing waste across a wide range of streams, from packaging to textiles and electrical and electronic equipment.

The revision of the WFD represents a crucial opportunity to deliver tangible benefits for climate action and resource efficiency. By fostering circular business models and supporting the creation of a real single market for secondary raw materials, the Directive can drive progress towards a more sustainable economy. To meet future ecodesign requirements on recycled content for apparel products, our members and their suppliers need to rely on a stable supply of secondary raw materials of sufficient quality and volume.

However, we note that the revised WFD leaves certain opportunities unaddressed, particularly in relation to textile waste. This paper sets out the key concerns and priorities of the retail and wholesale sector. We hope these considerations will help shape the forthcoming WFD secondary legislation, inform the ongoing Environmental Omnibus and Circular Economy Act discussions, and guide the next revision of the WFD.

Further need for harmonisation

Our sector calls for a harmonised extended producer responsibility (EPR) scheme for textiles at EU level. Retailers and wholesalers are currently confronted with diverging implementation requirements across the several Member States that have established EPR schemes, creating unnecessary complexity and costs.

At present, Member States have a high degree of discretion in defining their EPR schemes. This leads to significant variation in EPR rules hindering effective implementation and increasing the administrative burden on producers. Only harmonisation at EU level will leverage the effectiveness of producer responsibility organisations (PROs) schemes in delivering environmental benefits. We call the European Commission to set the maximum feasible harmonised requirements for national EPR schemes across the EU internal market, including on scope, definitions, harmonised fee structures, cost to be covered, reporting rules, and KPIs.

The lack of harmonisation is particularly challenging for reporting obligations, thus stronger emphasis should be placed **harmonising reporting rules for producers**—including aspects such as timing, frequency, operationalisation—as well as the **details and format for the disclosure of information**—including granularity of data and product categorisation. This is crucial in the context of directives,

where the flexibility granted to Member States often results in divergent interpretations and applications.

Harmonisation of reporting rules would reduce costs, streamline compliance processes, and encourage producer participation. Moreover, aligning reporting requirements must go hand in hand with ensuring the **interoperability of data systems and digital tools**. This would allow for smooth and efficient data exchange between public authorities and private operators, strengthening both compliance and transparency.

A centralised registration of producers

Reporting related to extended producer responsibility (EPR) obligations are currently fragmented across EU waste legislation. Retailers and wholesalers must comply with multiple frameworks – including the Batteries Regulation, the WEEE Directive, the Packaging and Packaging Waste Regulation, and now, for textiles, the Waste Framework Directive. In the case of textiles, additional complexity arises from divergent reporting requirements across Member States due to the Directive's transposition at national level.

The harmonisation of reporting formats and guidelines in the revised WFD is a positive step. However, it will not, on its own, resolve the significant administrative challenges faced by businesses. What is needed is an **interoperable digital interface connecting all 27 national registries**. Such a system would enable **single registration and centralised reporting**, while fully respecting Member States' competences. Crucially, it would reduce administrative burdens—particularly for SMEs—and strengthen producers' ability to comply efficiently. This centralised registration solution should ensure that is open to all PROs across Member States, assuring free competition.

We therefore **urge the European Commission to establish an EU one-stop-shop reporting solution at the heart of future legislation**. This system should be free of charge, non-discriminatory, and accessible to all producers, ensuring both fairness and efficiency.

Ecomodulation rules harmonised at EU level

We regret the inclusion of the possibility to eco-modulate EPR fees on the basis of criteria other than those established through forthcoming delegated acts under the Ecodesign for Sustainable Products Regulation (ESPR). The eco-modulation criteria based on commercial practices lack clear definitions at both EU and Member States levels, have not undergone a thorough impact assessment, and risk undermining the single market since Member States can choose whether to include them. This approach contradicts the principles of Better Regulation and could unintentionally disadvantage businesses that adhere to EU regulations.

EuroCommerce stresses the importance of ensuring that **forthcoming implementing acts** on fee modulation criteria pursuant the revised WFD are **accompanied by thorough impact assessments, including structured consultations with industry and stakeholders**. Such assessments must examine, in particular, the correlation between the likelihood of a product becoming waste and prevailing commercial strategies.

Supporting efficient textile waste collection

Our sector welcomes the establishment of a single collection network system in each Member State, rather than the creation of parallel collection schemes. A unified network, established and coordinated by Producer Responsibility Organisations (PROs) in cooperation with relevant stakeholders, including social economy entities, would optimise collection and management infrastructure, generating economies of scale and positive synergies. This approach will secure affordable feedstock for textile-

to-textile recycling, strengthen the competitiveness of the European recycling industry, and support compliance with future ecodesign requirements.

We nonetheless regret the lack of emphasis in requiring **coordination by PROs of collection networks, both in and between Member States..** The **forthcoming revision of the WFD should address this gap and strengthen PRO coordination**, particularly to support the development of a true single market for secondary raw materials for textiles.

Separate schemes for mattresses and for carpets

Our sector agrees that mattresses and carpets should be subject to EPR but through separate schemes, as their collection, transport, sorting, preparation for reuse, and recycling processes differ significantly from those for textiles such as apparel and footwear—and even between mattresses and carpets. If a mattress EPR scheme is introduced, **the Commission should be empowered to establish a harmonised framework with supporting provisions similar to those in place for textiles.** Managing these streams under a single scheme would otherwise create unnecessary costs and inefficiencies.

We therefore regret the inclusion of provisions allowing Member States to establish national EPR schemes for mattresses without EU level harmonisation. This risks leading to divergent product scopes across the Union. We strongly **call on the European Commission to develop a harmonised approach to ensure consistency, efficiency and a well-functioning single market.**