

Waste Shipment Regulation – harmonizing classification of waste to accelerate the Circular Economy

General messages

Retailers and wholesalers welcome the European Commission’s work on possibly green-listing waste streams for shipments for recovery between Member States, pursuant to the Waste Shipment Regulation (WSR). This initiative presents a significant **opportunity to develop a true single market for waste**, ensuring smooth and predictable shipments for recovery and thereby **boosting markets for secondary raw materials**. Achieving this goal is essential for positioning the EU as a global leader on circular economy by 2030, as envisaged under the Clean Industrial Deal.

However, several obstacles currently hinder progress. **Divergent of interpretation** by Member States on the classification of some waste streams, or the **application of the “notification procedure”** to “unlisted waste” frequently delay or even prevent the shipments of waste for high quality recycling between EU Member States. These inconsistencies undermine the functioning of the **single market for secondary raw materials** and significantly **discourage investments** in cross-border recycling projects, which are essential to achieving the industrial-scale volumes required for economy viability.

Effective cross-border waste shipments are crucial to ensuring that waste materials can reach facilities where recycling capacities exist. To facilitate these intra-EU shipments, it is essential that waste from **footwear, mattresses and wood** be classified as **“green-listed”** under Annex III of the WSR.

Finally, it is important to emphasise that **extending circular business activities beyond the EU’s borders** is equally critical to achieving a sustainable and resilient global circular economy.

Footwear waste and mixture of waste footwear waste clothing and other textile waste

Issue

- Textile waste is listed under entry B3030 in Annex III of the WSR are recognised as green-listed, i.e. can move under simplified procedure. However, **textile waste is often mixed with items that are not under Annex III**, i.e. waste of footwear, accessories (belts, hats) or household (carpets, curtains)
- Furthermore, textile waste as described in **entry B3030** in Annex III may **not align** with the current scope of the **EPR schemes** under the **revised WFD**

Asks

1. Include a **specific "footwear" category in the green list**

Once footwear waste has been sorted and separated from textile waste, it must be shipped to suitable recycling facilities when preparation for reuse is not possible. While sorting activities generally take place within individual Member States, recycling technologies often operate at a cross-border scale. Many recycling plants require large volumes of feedstock to function efficiently, which can only be achieved by pooling resources across several Member States; establishing such facilities in every country would not be economically feasible. The lack of a dedicated "footwear waste" category in the green list therefore poses challenges for managing this waste stream, particularly as EPR schemes are introduced across Europe.

2. Ensure that the **interpretation of textile waste in the green list (Annex III (i.e. B3030)) is aligned with the current scope of the EPR schemes under the revised WFD**

First, the entry B3030 in Annex III of the WSR highlights a **significant disconnect** between the **legal framework** governing textile waste shipments and the **practical reality** of what is actually collected for sorting. In practice, containers for used textiles typically contain a mix of items (such as used clothing, footwear, accessories (i.e. belt, scarves, gloves, hats and bags), and household textiles) since consumers tend to deposit these all together in the same container. However, and secondly, **not all** of these items are **mentioned in entry B3030**.

The revised WFD establishes harmonised rules for EPR schemes for textiles, textile-related products and footwear. Under EPR schemes, textile waste will be collected and, as noted above, it will be mixed. Where this mixed textile waste needs to be shipped to other Member States for recovery operations, the current lack of alignment between the entry B3030 in Annex III of the WSR and the scope of EPR schemes in the revised WFD will prevent the container from following the simplified procedure set out in Annex III.

To ensure regulatory coherence and well-functioning of the single market, the current scope of EPR schemes under the WFD should be included in the green list, as well as the **mixtures** of waste footwear, waste clothing and other textiles.

Mattresses waste

Issue

- Discarded mattresses fall under **mixed bulky waste codes** (e.g., 200307), requiring a "notification procedure" for shipment. However, mattresses are **non-hazardous and homogeneous** and can be separately collected and safely recycled.

Asks

1. **Green-list waste from mattresses**

In certain countries, mattresses are a separately collected, non-hazardous stream that can be prepared for recovery without posing risks to human health or the environment. Dedicated dismantling and recycling facilities (e.g. RetourMatras in the Netherlands, France, Belgium, Denmark) demonstrate that safe, high-quality recovery routes already exist. Accordingly, shipments for recycling meet the conditions under Annex III of the WSR.

Each mattress contains recoverable materials such as steel, polyurethane foam, textiles, and, in some cases, latex or coconut fibres. These components can be recycled into new steel products, rebond foam for insulation and underlays, or chemical feedstock for polyols.

Centralised recycling facilities have developed specialised dismantling and recovery processes that are not available in every Member State. To ensure economies of scale and maintain viable circular business models, cross-border shipments are therefore essential.

Requiring such shipments to follow a “notification procedure” significantly increases costs, causes logistical delays, and discourages recycling, without providing any additional environmental protection compared to the Article 18 (“green-list”) procedure.

Green-listing mattresses under Annex III would unlock substantial recycling volumes, reduce incineration, and contribute directly to the EU circular economy objectives. This harmonisation is especially relevant given upcoming EPR schemes for mattresses across Member States.

Wood waste

Issue

- **Only two categories exist** in the WSR:
 - B3050 Untreated wood/cork (“green list” – simple procedure)
 - AC170 Treated/contaminated wood (“amber list” – prior notification required)
- In practice, **most wood waste includes mixed materials**, thus authorities often require “notification procedure”, even for non-hazardous mixtures.

Asks

1. **Green-list non-hazardous waste from wood**

The WSR currently only recognises two broad categories of wood waste. Untreated or clear waste wood is currently “green-listed” under Annex III of the WSR and can therefore be shipped for recovery via a “simple procedure”. By contrast, **treated or contaminated wood** falls under “amber list”, **requiring a “notification procedure”** which is significantly more burdensome and costly.

However, this classification framework does **not reflect the real composition of wood waste streams**. Under the Waste Framework Directive¹, only one waste code (i.e. 030105) clearly covers non-hazardous waste and certain wood-based materials, such as particleboard and veneer.

In practice, nonetheless, the wood recycling and panel industries handle a much broader range of materials, including MDF, HDF, plywood, fibreboard and honeycomb panels, all of which combine wood with glues, resins and bonding agents. Other waste codes, like 170201 (for construction and demolition wood) and 191207 (for processed wood), also include these kinds of mixed wood products. This demonstrates that the current classification framework does not align with how wood waste is actually generated, collected, or recycled in the EU.

As a result, **most mixed wood waste**, even when non-hazardous, is **subject to the amber-list notification procedure**, since local authorities often require notification when waste contains any material other than solid wood. This creates unnecessary administrative barriers, limits intra-EU recycling flows, and discourages circular use, as processors cannot feasibly separate solid wood from engineered panels.

¹ Commission Decision 2000/532/EC, adopted under Article 7 of the Waste Framework Directive (2008/98/EC).

From a technical and economic standpoint, such separation is unjustified. Panel manufacturers can process mixed wood streams safely and efficiently without compromising product quality. Furthermore, advanced internal separation systems are already integrated within panel production facilities, making upstream segregation impractical.

To enable the circular use of wood, **mixed non-hazardous wood waste should be green-listed under Annex III of the WSR**. This would facilitate cross-border recovery and panel manufacturing within the EU, reduce unnecessary administrative and logistical burdens, and support the EU's circular economy and zero-waste objectives by maximising resource efficiency in wood recycling.

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