

Position Paper

CEN and CENELEC Position on the Revision of the Waste Framework Directive November 2023

Executive Summary

CEN and CENELEC welcomes the revision of the Waste Framework Directive (WFD). The extension of the scope of the framework to textiles and food waste is a great step in strengthening the European circular economy. European Standards can play a vital role in providing the technical guidance needed to make the necessary practical changes to implement the ambitions laid out in this proposal. Therefore, CEN and CENELEC suggests that the European Commission consider the use of standards to define criteria in textile and food waste management.

Introduction

Waste management plays a crucial role in reintegrating resources utilized in products and infrastructure into the value cycle. Once an owner decides to dispose of waste, a series of actions are initiated to safeguard both health and the environment from adverse waste-related impacts while ensuring that resources are conserved in accordance with the waste hierarchy. European Standards (ENs) are a proven tool to support EU legislation, in such cases known as Harmonized Standards (hENs), and to promote innovation in all corners of the European Single Market. ENs are designed in a transparent, open, and expert-driven system that responds to the specific needs of industry while considering broader social and environmental goals. The revision of the Waste Framework Directive (WFD) should consider existing standards related to waste management. These standards can also be further developed to ensure the effectiveness of these processes. The suggestions for waste reduction targets related to food waste and the establishment of an Extended Producer Responsibility (EPR) scheme for used and discarded textiles can be reinforced by these standards.

CEN and CENELEC believe that standards play an essential role in providing the technical guidance needed to make the necessary practical changes to implement the green transition. Bodies within the CEN and CENELEC system working on the topics of circularity, textile and food waste at both a strategic and technical level include:

- CEN and CENELEC Strategic Advisory Body on Environment (SABE)
- CEN/CLC/JTC 10 Material efficiency aspects for products in scope of Ecodesign legislation
- CEN/TC 473 Circular Economy
- CEN/TC 248 Textiles and textile products
- CEN/TC 309 Footwear
- CEN/TC 275 Food analysis - Horizontal methods
- CEN/TC 189 Geosynthetics

Requirements for sorting of textiles

The Waste Framework Directive (WFD) proposes to establish sorting requirements for textiles and footwear that have been separately collected. These sorting operations aim to produce items suitable for reuse, meeting the needs of both the second-hand textile market and recycling feedstock markets within the Union and globally. Given the greater environmental benefits associated with extending the lifespan of textiles, the primary objective of sorting operations should be reuse, with recycling coming into play only when items are professionally assessed as not suitable for reuse. The Commission should prioritize the development of these sorting requirements for both reusable and recycled textiles, developing an end of waste criteria as well for recycled textiles. This could include initial sorting processes that may occur at collection points for obvious non textile items. CEN could provide input and propose the use of standards to either support the End of Waste Criteria or entirely replace them. The End of Waste Criteria system aims to facilitate the transition of waste into non-waste materials, thus exempting it from waste regulations. However, experiences thus far have shown that the End of Waste track may not be functional for operators or Member States. Apart from Italy, where it was made mandatory, there are not many examples of established criteria.

Proposal for comment: In the introductory text (31), the WFD proposes the establishment of End of Waste Criteria for separately collected textiles and footwear. As an option to support these criteria or as an alternative approach, the European Commission could contemplate using a set of standards to define criteria for various stages of textile waste management, encompassing collection, sorting, and quality criteria. This approach would enable participants in the textile value chain to operate in accordance with objective, industry-recognized standards that also incorporate all relevant legislation and targets.

Prevention of food waste generation

In regard to Article 9a, Paragraphs 2 and 3 require Member States to monitor and assess the implementation of their food waste prevention measures, including compliance with the food reduction targets mentioned in paragraph 4. This should be done by measuring food waste levels using the methodology established in accordance with paragraph 3.

Furthermore, the European Commission is authorized to adopt delegated acts, as per Article 38a, to complement this Directive. This includes the establishment of a common methodology and minimum quality requirements for uniform measurement of food waste levels. Rather than directly setting out a methodology in delegated acts, the European Commission should consider setting out essential requirements in legislation and then referencing applicable European standards in delegated acts. European Standards are designed by technical experts with specialized knowledge who ensure that standards represent the cutting-edge best practices of the sector. European Standards are also updated at a more frequent pace than legislation and delegated acts, thus ensuring that the methodologies required are relevant and useful for those carrying out these analyses on a day to day basis. When it comes to food waste, standards can help establish common guidelines and practices for the entire food sector, from production to consumption.

It is also important to consider that food loss and waste is a global issue, thus there is great value in finding global solutions. At international level, the International Organization for Standardization (ISO) is carrying out standardization work, with the participation of European National Standardization Bodies, in this topic through the ISO/TC 34/SC20 Food Loss and Waste. The European Commission should be aware of the standardization work ongoing in ISO and could consider the possibility of a standardization request that would implement ISO standards as European standards.

Proposal for comment: The European Commission should consider issuing a standardization request to establish a common practice for conducting analyses to measure food waste in municipal waste. These standards could encompass normative descriptions of sampling methods, procedures for waste analysis, etc.

About CEN and CENELEC

CEN (European Committee for Standardization) and CENELEC (European Committee for Electrotechnical Standardization) are recognized by the European Union (EU) and the European Free Trade Association (EFTA) as European Standardization Organizations responsible for developing standards at European level, as per European Regulation 1025/2012. The members are the National Standards Bodies (CEN) and National Electrotechnical Committees (CENELEC) from 34 European countries. European Standards (ENs) and other standardization deliverables are adopted by CEN and CENELEC, are accepted and recognized in all of these countries. These standards contribute to enhancing safety, improving quality, facilitating cross-border trade and strengthening of the European Single Market. They are developed through a process of collaboration among experts nominated by business and industry, research institutions, consumer and environmental organizations, trade unions and other societal stakeholders. CEN and CENELEC work to promote the international alignment of standards in the framework of technical cooperation agreements with ISO (International Organization for Standardization) and the IEC (International Electrotechnical Commission).