

Revising the EU Waste Framework Directive in 2025:

A stepping stone forward or a wasted opportunity?

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The EU Waste Framework Directive 2008/98/EC¹ (hereinafter “the Directive”), constituting the cornerstone of the EU waste framework legislation, established a fundamental framework for waste management in the European Union. “Its primary goal is to protect the environment and human health by preventing or reducing waste generation, mitigating the adverse impacts of waste generation and management, and reducing the overall impacts of resource use while improving efficiency”.² During the last decade, the Directive has undergone significant amendments to address emerging problems in waste management, through, *inter alia*, Directive (EU) 2018/851³ as well as Regulation (EU) 2023/1542⁴ concerning batteries and waste batteries. In February 2025 the legislative institutions of the European Union reached a provisional agreement on a proposal, originally brought forward by the European Commission in July 2023,⁵ for a new targeted revision of the Directive with the aim of significantly reducing food and textile waste in the EU (hereinafter “the Proposal”).

The aim of this paper is twofold. Initially, this paper aims to bring forward, as well as discuss in detail, the key provisions as well as measures that can be found within this legislative Proposal as agreed by the co-legislators. In principle, the European Parliament and the Council of the European Union agreed to introduce binding food waste reduction targets to be met at national level by 31 December 2030: 10% in food processing and manufacturing and 30% per capita in retail, restaurants, food services and households. These targets will be calculated in relation to the average annual amount generated between 2021 and 2023. Furthermore, according to the agreement reached, member states will have to implement extended producer responsibility for textiles (EPR) to cover the costs of collecting, sorting and recycling waste textiles. These systems will need to be in place within 30 months of the Directive’s changes coming into effect.

¹ Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives, OJ L 312/3.

² EU Waste Framework Directive, <https://www.iea.org/policies/24849-eu-waste-framework-directive>

³ Directive (EU) 2018/851 of the European Parliament and of the Council of 30 May 2018 amending Directive 2008/98/EC on waste, OJ L 150/109.

⁴ Regulation (EU) 2023/1542 of the European Parliament and of the Council of 12 July 2023 concerning batteries and waste batteries, amending Directive 2008/98/EC and Regulation (EU) 2019/1020 and repealing Directive 2006/66/EC (Text with EEA relevance), OJ L 191/1.

⁵ European Commission, Proposal for a Directive of the European Parliament and of the Council amending Directive 2008/98/EC on waste, COM (2023) 420 final.

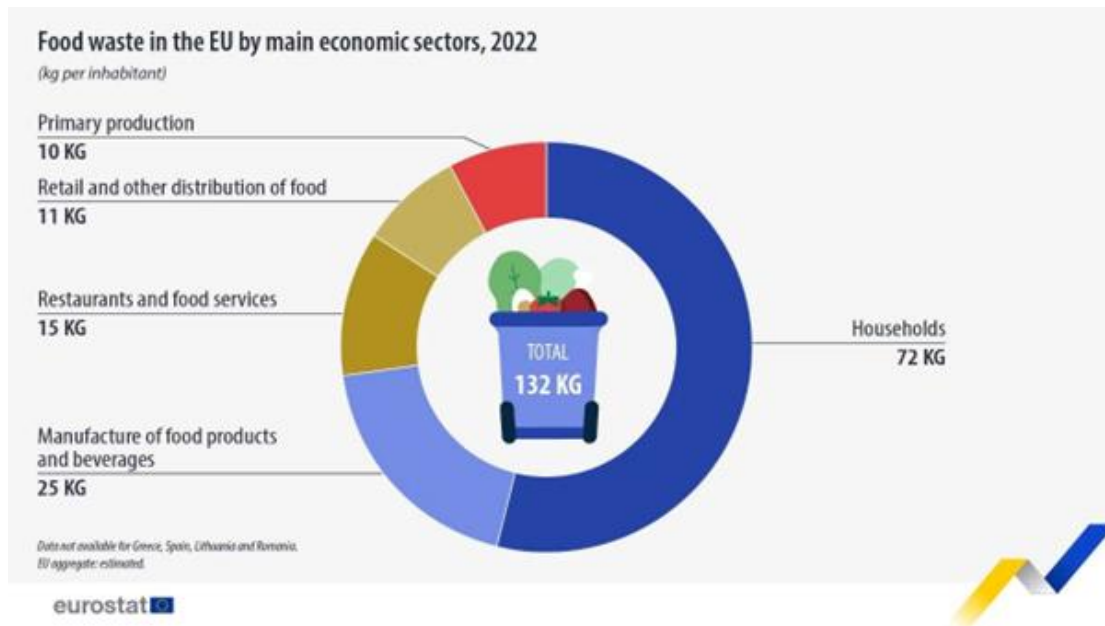


Figure 1 : Source Eurostat

Secondly and most importantly, this paper aims to assess whether the content of this Proposal appears to be a welcome step forward in tackling waste management in 2025. In detail, one could comment that on the one hand, while the first-ever legally binding food waste generation targets as well as the introduction of EPR for textiles are two welcome steps forward, the fact that primary production is completely excluded from the food waste reductions targets as well as that no concrete targets on textile waste management to achieve circularity have been introduced, leaves room for improvement. Furthermore, apart from setting in place efficient and ambitious or even realistic waste reduction targets, one may claim, that these legislative provisions ought to be accompanied by their actual implementation and realization at national level for making a difference regarding the advancement of circularity.

This paper will conclude, *inter alia*, that the Proposal, through the introduction of realistic targets, for many member states, appears to be a stepping stone forward, for the reduction of food waste and the encouragement of the circularity of textiles, Yet certain of its provisions need to be rethought and become more ambitious for the actual advancement of circularity provided that national level implementation and enforcement EU waste legislation weaknesses are additionally and in parallel tackled.