

# The European Union's Revised Directive on Waste Management and Circular Economy Enters into Force

16 October 2025

On 10 September 2025, the European Parliament and Council adopted [Directive \(EU\) 2025/1892](#) (the “Directive”), amending Directive 2008/98/EC on waste. The Directive introduces significant new requirements for Member States and market participants, with a particular focus on the food and textile sectors, in support of the European Union’s circular economy and sustainability objectives.

This In Depth summarises the principal obligations introduced by the Directive, with an emphasis on the new binding food waste reduction targets and the establishment of harmonised extended producer responsibility (“EPR”) schemes for textile, textile-related and footwear products. It also highlights timelines, governance and data/reporting requirements relevant to compliance planning.

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## Key Amendments Concerning Food Waste

### Obligation to Take Active Steps to Prevent Food Waste

The Directive requires Member States **to take all appropriate measures to prevent the generation of food waste along the entire food supply chain**. These measures must include at least the following:

- Public awareness and behavioural change campaigns to reduce waste.
- Identifying and addressing inefficiencies in production, processing, retail and distribution and fostering cooperation among stakeholders.
- Promoting food donation and ensuring that human consumption is prioritised over animal feed or non-food uses.
- Supporting SMEs and social enterprises through training, skill-building and funding.
- Encouraging innovation and technology aimed at food waste prevention.

All relevant actors—especially SMEs—must be involved proportionately to their capacity and role.

### **Binding Reduction Targets by 2030**

The Directive establishes, for the first time, **binding national targets for the reduction of food waste**, in line with the United Nations Sustainable Development Goal Target 12.3. Member States must achieve, by 31 December 2030:

- A **10% reduction** in food waste generated in **processing and manufacturing** compared to the annual average between 2021 and 2023; and
- A **30% per capita reduction** in food waste generated jointly in **retail and other distribution, restaurants and food services and households** compared to the same reference period.

Member States may use earlier reference years than 2021–2023 for setting baselines, provided they have reliable data collected under comparable methods. They must notify the Commission by April 2027 of any intention to do so and publish their data and measurement methods.

### **Monitoring, Measurement and Reference Period Adjustments**

Member States must monitor and assess their food waste-prevention measures, ensuring progress toward the 2030 reduction targets. The European Commission will establish a **common EU methodology and minimum quality requirements** to ensure consistent measurement of food waste levels across all Member States.

To ensure fairness, particularly for countries with significant fluctuations in tourism affecting household and hospitality waste, the Commission will, by October 2027, introduce a **correction factor adjusting for changes in tourism levels**.

Moreover, by 31 December 2027, the Commission will review the 2030 targets and possibly propose new or extended targets beyond 2030, assess whether legally binding 2035 targets should be introduced and examine food waste and losses in primary production and how to address them.

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## Key Amendments Concerning Textiles Waste

### EPR for Textiles

A central innovation of the Directive is the mandatory introduction of **harmonised EPR schemes for textile, textile-related and footwear products** listed in Annex IVc of the Directive that are made available on the market for the first time. Member States must establish EPR schemes by 17 April 2028 and clearly define the roles and responsibilities of relevant actors<sup>1</sup> involved in implementation, monitoring and verification of EPR. By requiring producers to cover the costs of managing textile and footwear waste, the Directive aims at providing an incentive to reduce waste and increase the circularity of these products.

Producers established in another Member State or outside the European Union who sell in-scope products by distance directly to end-users must appoint, by written mandate, an authorised representative established in the Member State where the products are first made available on the market to fulfil producer obligations under the EPR scheme.

Member States must ensure that producers of products in scope cover the following costs, subject to cost-cap and transparency requirements:<sup>2</sup>

- collection of used and waste products and subsequent waste management;
- compositional surveys of collected mixed municipal waste;
- provision of information, including via appropriate campaigns, on sustainable consumption, waste prevention, re-use, preparing for re-use (including repair), recycling, other recovery and disposal;
- data gathering and reporting to competent authorities;
- support for research and development to improve product design and waste prevention and management aligned with the waste hierarchy, with a view to scaling fibre-to-fibre recycling.

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<sup>1</sup> Member States must ensure that relevant actors are involved in the scheme, including at least producers, producer responsibility organisations implementing obligations on producers' behalf, private or public waste operators, local authorities, re-use and preparing-for-re-use operators and social economy entities.

<sup>2</sup> The costs producers must cover may not exceed what is necessary to provide these services in a cost-efficient manner and must be established transparently among the relevant actors involved.

Member States must ensure that producer cost coverage applies to used and waste products deposited at collection points (including items aggregated from private take-back) for products first made available on the market as follows:

- From 16 October 2025, where an EPR scheme for the listed products is already established in the Member State on that date.
- From the date on which the Member State transposes the Directive, or at the latest 17 April 2028, where an EPR scheme is established after 16 October 2025.

### **Separate Collection System**

Producer Responsibility Organisations (“PROs”) must establish a separate collection system for used and waste textile, textile-related and footwear products listed in the Directive, regardless of the products’ nature, composition, condition, name, brand, trademark or origin. This system must:

- Offer collection to social economy entities, retailers and public authorities and provide practical arrangements, including free provision of suitable collection and transport containers to collection points within the PRO’s system.
- Ensure free collection from collection points in the PRO’s system at a frequency adapted to area and volume.
- Ensure free collection, in coordination with social economy entities and other actors, of waste generated by those entities from items collected through the PRO’s system.

The collection system must consist of collection points set up by PROs and waste operators on their behalf, in cooperation with one or more of social economy entities, retailers, public authorities or their contractors, and voluntary collection point operators. Coverage must extend across the entire territory, considering population, density, expected volumes, accessibility and proximity to end-users, and not be limited to profitable areas.

The system must maintain a sustained and technically feasible increase in separate collection and decrease in mixed municipal waste collection for the relevant products. Where multiple PROs operate, they must collectively cover the whole territory to provide uniform service quality of separate collection. Member States must designate the competent authority or appoint an independent third party to oversee coordinated compliance in accordance with EU competition law.

## Requirements for Online Platforms and Fulfilment Service Providers

To address the growing role of cross-border e-commerce, the Directive introduces new due diligence requirements for online platforms and fulfilment service providers.

More specifically, **online platforms** that allow consumers to conclude distance contracts with traders must, prior to allowing a producer to use their services, ensure that textile producers:

- are registered in the national producer register of the Member State where the consumer is located; and
- have provided a self-certification confirming compliance with EPR and separate collection obligations.

**Fulfilment service providers**<sup>3</sup> must:

- obtain the same compliance information as required for online platforms before contracting with producers;
- use official databases or reliable sources to verify accuracy; and
- suspend services if producers fail to provide or update the required information. Producers remain liable for the accuracy of the information provided, but they retain the right to challenge suspensions before courts in the Member State where the fulfilment service provider is established.

## Register of Producers

Member States must establish a **register of producers** for textile, textile-related and footwear products listed in Annex IVc to monitor compliance. The Commission must create a central website linking to all national registers, which Member States must notify to the Commission within 30 days of each register's launch. Each register's information must be easily accessible, public and free of charge, machine-readable, sortable and searchable, and based on open standards for third-party use, while safeguarding commercially sensitive information under EU and national law. Producers are required to register in the producer register in every Member State where they first

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<sup>3</sup> Fulfilment service providers are any natural or legal person offering, in the course of commercial activity, at least two of the following services: warehousing, packaging, addressing and dispatching, without having ownership of the products involved, excluding postal services, parcel delivery services and any other postal services or freight transport services.

make such products available on the market by submitting a registration application in each such Member State.

### **PROs Information Requirements**

PROs must inform end-users of:

- the role of end users in waste prevention, including best practices, sustainable consumption and product care;
- available re-use and repair arrangements for textiles and footwear;
- locations of collection points;
- proper participation in separate collection, including donation; and
- environmental, health, social and human rights impacts of textile production, recycling, recovery, disposal and improper discarding (e.g., littering) and steps taken to mitigate those impacts.

PROs must publish on their websites, at least annually and subject to commercial/ industrial confidentiality, key transparency data: the amount (including weight) of products first placed on the market, the weight separately collected (identifying unsold products), rates of re-use, preparing for re-use and recycling (with fibre-to-fibre specified), rates of other recovery and disposal, export rates of items fit for re-use and of waste items, and information on their operator selection procedures.

They must also report annually to competent authorities the same information, specifying quantities by weight for re-use/re-use preparation/recycling (including fibre-to-fibre), other recovery/disposal, and exports and for micro-enterprises (fewer than 10 employees and turnover and balance sheet each not exceeding EUR 2 million). Member States must require PROs to request only the annual amount of products first placed on the market.

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## **Data, Reporting and Oversight**

Member States must report annually on food waste levels and the implementation of EPR schemes for textiles, with data managed by the European Environment Agency. The Directive introduces harmonised formats for producer registration and reporting and requires public disclosure of key performance indicators by PROs. The Commission

is empowered to adopt delegated and implementing acts to ensure uniform application and to review and, if appropriate, revise targets and requirements.

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## Implementation and Review

Member States must transpose the Directive into national law by 17 June 2027. The Commission will evaluate the effectiveness of the Directive by 31 December 2029, including the potential for additional waste prevention and recycling targets and the adequacy of EPR scheme financing.

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## Implications

The Directive represents a significant step in the European Union's transition to a circular economy, imposing new compliance obligations on producers, distributors and other actors in the food and textile value chains. Companies operating in these sectors should review their product design, supply chain and waste management practices in light of the new requirements and prepare for the establishment of EPR schemes and enhanced reporting obligations.

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