

# WASTE FRAMEWORK DIRECTIVE AND EXTENDED PRODUCER RESPONSIBILITY SCHEMES FOR TEXTILES

Guidance for RREUSE members

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# WASTE FRAMEWORK DIRECTIVE AND EXTENDED PRODUCER RESPONSIBILITY SCHEMES FOR TEXTILES

## Guidance for RREUSE members

This guidance in an FAQ format is designed to help RREUSE members, and their members, navigate the key upcoming changes, with a particular focus on **Extended Producer Responsibility (EPR)** requirements.

If you have additional questions about the changes introduced by the revised WFD, please share them with the RREUSE secretariat so that we can update these FAQs.

*The final act is available online:*

[\*\*DIRECTIVE \(EU\) 2025/1892 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 10 September 2025 amending Directive 2008/98/EC on waste\*\*](#)

## 1. When will the WFD take effect?

- Directive's entry into force: **17 October 2025**
- Deadline for Member States to transpose the new provisions: **17 June 2027**
- Deadline for Member States to set up textiles EPR schemes: **17 April 2028**
  
- Because this is not a regulation, the rules do not automatically apply across the EU as such. Instead, each Member State needs to implement the WFD in its national legislative framework (this is called the transposition). Member States have **20 months** from the WFD's entry into force to adopt the necessary laws and regulations.
  
- EPR schemes must be established **within 30 months** of the Directive's entry into force.

*See Article 2, 3, 22(a) – Transposition & entry into force*

## 2. What are the Extended Producer Responsibility (EPR) requirements for textiles?

- **Textiles, textile-related, and footwear products** will have to be covered by EPR schemes across the EU.
- Producers must **take responsibility** for the products they place on the market in a Member State.

*See Article 22a – EPR Requirements*

## 3. Are mattresses included in the EPR scheme?

Mattresses **may** be included under national EPR schemes, but this is **optional** for Member States.

*See Article 22a(1a)*

## 4. What obligations do producers have under EPR?

- Finance **waste management operations**.
- Cover costs for **surveys, awareness campaigns, data reporting, and R&D support**.
- **Appoint an authorised representative** if operating in another Member State.
- Designate or join a **Producer Responsibility Organisation (PRO)**.

*See Articles 22a(3), 22a(4–6), 22c(1–3)*

## 5. Who is involved in implementing EPR schemes?

Stakeholders that must be included are the following:

- Producers
- PROs
- Waste operators
- Local authorities
- Reuse operators
- **Social economy entities** (e.g. local social enterprises)

*See Article 22a(3a)*

## 6. What will EPR fees cover?

EPR must cover:

- Waste management operations, including **collection, transport, sorting, and treatment** of waste textiles
- Public information campaigns
- Data collection and reporting
- Contributions are eco-modulated based on product design, durability, and recyclability.

*See Article 22a(4), 22c(3)*

## 7. What is eco-modulation?

Eco-modulation means adjusting EPR fees based on:

- Ecodesign requirements
- Product lifespan
- Harmful commercial practices like fast fashion

*See Articles 22c(3a), 22c(3a)*

## 8. What are the rules for the separate collection of textiles?

- Producer Responsibility Organisations must ensure the **separate collection** of textile waste.
- Collection systems must:
  - be **nationwide, free of charge, and accessible**;
  - involve **social economy entities**, retailers, and public authorities;
  - prioritise **local sorting and reuse**.

*See Article 22d & Article 22c(5–6)*

## 9. Which specific provisions on social economy entities are included?

- Social enterprises can:
  - **maintain and operate their own collection points**;

- receive **preferential treatment** for the collection points' locations;
- be **exempt from reporting** if the burden is disproportionate.
- Social enterprises may not:
  - **be required to hand over the collected textiles** to the PRO;
  - **be refused participation** in the EPR by the PRO

*See Article 22c(8–10)*

## 10. What are the sorting requirements?

- Sorting must:
  - prioritise **local reuse**;
  - allow for **granular sorting** (item-by-item);
  - prepare non-reusable items for **remanufacturing and fibre-to-fibre recycling**;
  - meet **End-of-Waste (EOW)** criteria (Technical proposals for EoW criteria for textile waste expected in Q4/2025).

*See Article 22d(5)*

## 11. How are textile shipments regulated?

- Textiles must be **inspected, sorted, and protected** during shipping.
- Must include proper **documentation and labelling**.
- **Producers, third parties acting on their behalf or other persons arranging the shipment may be charged** the costs of the inspection and storage if a shipment labelled as reuse is suspected of being waste.

*See Article 22d(7–10)*

## 12. What reporting obligations apply to social economy entities?

- Social economy entities must **report annually the quantities** collected, reused, recycled, and exported.
- Social enterprises, even if they decide to operate outside of the EPR scheme, must comply with the reporting requirements.
- However, a Member State may exempt them from the reporting requirements if these create a disproportionate administrative burden.

*See Article 22c(9-10)*

## 13. What information must PROs publish?

- PROs must share:

- quantity of products placed on the market;
- separate collection rates;
- rates of reuse, recycling, and disposal;
- export figures;
- selection criteria for waste operators.

*See Article 22c(15)*

## 14. How will the WFD evolve in the future?

- The Directive foresees a revision by the end of **2029**.
- By 31 Dec. 2029, the Commission will:
  - evaluate the **effectiveness** of EPR schemes;
  - consider setting **targets for waste prevention, collection, reuse, and recycling**;
  - assess the need for **financial contributions from commercial reuse operators** (including social enterprises) to cover the costs arising from the application of the WFD requirements (this would apply in particular to Member States where the proportion of used textiles is high compared to that of new textiles, and where the EPR fees collected from textile producers may not be sufficient to cover the costs of waste management for these products).

*See Article 41b*