

## The Revision of EU Waste Framework Directive



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Clean Air Task Force (CATF) commends the work of the European Commission on the most pressing issues stemming from waste management and welcomes the opportunity to provide comments to the upcoming revision of the Waste Framework Directive (WFD). As the WFD defines the basic principles of waste management in EU, the revision is an opportunity for the Union to better align its waste management system with its climate and circular economy goals, including its Methane Strategy and Global Methane Pledge commitments.

CATF is a global non-profit organisation working to safeguard against the worst impacts of climate change by catalysing the rapid development and deployment of low-carbon energy and other climate-protecting technologies. With 25 years of internationally recognised expertise on climate policy, CATF is a pragmatic advocacy group focusing on cutting GHG emissions as fast as possible. Methane emissions reduction is one of our key priorities and areas of expertise. CATF has been working on this issue for over two decades.

According to the United Nations Environment Programme, the largest potential for methane mitigation in Europe is in the waste sector.<sup>1</sup> Methane emissions from the landfilling of waste were almost halved between 1990 and 2017, in part because of the waste hierarchy and the diversion of biodegradable waste to other waste treatment options. However, as stressed in the EU strategy to reduce methane emissions, waste still represents 26% of EU anthropogenic methane emissions. Further actions are therefore needed to address methane emissions from the waste sector.

The easiest and most effective way to reduce methane emissions from the waste sector is to keep organic waste out of landfills. Additionally, due to the share of bio-waste in the EU waste stream – about 34 percent – it is essential to prevent and manage bio-waste to reach the EU's recycling and landfilling targets.<sup>2</sup> The waste hierarchy and measures currently included in the revised WFD will reduce methane and other GHG emissions. However, viewing management of bio-waste through the lens of climate change can help raise the profile of these solutions. CATF suggests the following changes to accomplish this:

- **Redesigning the EU's waste hierarchy with climate and the circular economy in mind.** The current EU waste hierarchy aims at reducing the amount of waste sent to landfills to minimise its impact on human health and the environment. The redesigned hierarchy should help increase focus on the initial steps of waste management that are necessary to reach climate and circular economy goals; an example is [the waste hierarchy as proposed by Zero Waste Europe](#). A revised hierarchy should place increased emphasis on steps related to waste prevention, so as to alter the perception of waste, including food waste, to that of a usable resource. The hierarchy should also highlight composting and anaerobic digestion in the recycling step, making options for organic waste treatment explicit.

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<sup>1</sup> United Nations Environment Programme and Climate and Clean Air Coalition (2021). Global Methane Assessment: Benefits and Costs of Mitigating Methane Emissions. Nairobi: United Nations Environment Programme. <https://www.unep.org/resources/report/global-methane-assessment-benefits-and-costs-mitigating-methane-emissions>

<sup>2</sup> European Environment Agency (2020). Bio-waste in Europe – Turning Challenges into Opportunities. Luxembourg: European Environment Agency. <https://www.eea.europa.eu/publications/bio-waste-in-europe/download>



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- **Setting separate quantitative recycling targets for municipal bio-waste.** These targets, considered in Article 11(6), would send a clear signal to Member States about the need for organic waste recycling and enhance the measures already included in the WFD, such as the requirement for source separation of bio-waste.
- **Including climate considerations in Member State waste management plans.** Though the WFD requests that Member States establish national waste management plan(s), it does not stress the importance of considering the climate impacts of waste management in these documents. Through Article 28, Member States should be encouraged to explicitly address the methane abatement potential of the waste sector within national waste management plans or through specific organic waste strategies. Organic waste strategies help countries understand their organic waste streams and develop data-driven and country-specific approaches to manage them. For example, [Chile's National Organic Waste Strategy](#), which was developed with help from the Government of Canada. Requiring Member States to plan for the climate impacts of waste management will also support the revision and strengthening of goals in the EU's Nationally Determined Contribution to the United Nations Framework Convention on Climate Change.

Separate collection of wet and dry wastes provides better quality, cleaner feedstocks for both recycling and organic waste treatment. CATF strongly welcomed the EU's requirement to separate bio-waste at source by the end of 2023. Further support could be provided to Member States in implementing these programmes. This could include funding and technical assistance regarding infrastructure needs, monitoring, and awareness raising, as well as support to develop national and local policies that incentivise source separation, such as pay-as-you-throw schemes.

Additionally, CATF is stressing the need for a comprehensive approach on reducing methane emissions from waste, including with the Farm-to-Fork Strategy and its Directive proposing legally binding targets to reduce food waste, and with the Landfill Directive planned for 2024. CATF is calling for **a collective EU food waste reduction target of 50 % by 2030** to align with United Nations Sustainable Development Goals. While some Member States have set national food waste reduction and prevention targets, a binding target is needed to ensure additional action. Targets for individual Member States should be based on national circumstances to account for waste generation rates and waste prevention and management infrastructure. In addition to enhancing progress toward EU landfill reduction and recycling targets, a food waste reduction target will further reduce methane emissions from the waste sector, increase food security, reduce upstream energy and food production costs, and likely reduce waste management costs in Member States.

Source separation and treatment of organic waste, when paired with food waste prevention programs can reduce between 41% and 55% of methane emissions from the waste sector in the EU.<sup>3</sup>

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<sup>3</sup> CE Delft (2022). Methane Reduction Potential in the EU Between 2020 and 2030.  
[http://changingmarkets.org/wp-content/uploads/2022/06/CE\\_Delft\\_210502\\_Methane\\_reduction\\_potential\\_in\\_the\\_EU\\_Def.pdf](http://changingmarkets.org/wp-content/uploads/2022/06/CE_Delft_210502_Methane_reduction_potential_in_the_EU_Def.pdf)