EXPRA's feedback on the next Early Warning report to assess Member States' progress towards reaching the 2030 recycling targets of municipal waste and packaging waste

23rd October 2026

EXPRA is the European Association of Extended Producer Responsibility Organisations (PROs), representing 25 organisations across the European Union and the European Economic Area which ensure that producers contribute to the costs associated with the life cycle and end-of-life management of their products, including collection, sorting, reuse, recycling.

In 2023, the Early Warning Report concluded that 10 Member States were at risk of missing both the targets for municipal and all packaging waste for 2025 – Bulgaria, Croatia, Cyprus, Greece, Hungary, Lithuania, Malta, Poland, Romania and Slovakia. EXPRA expressed its concerns over the challenges that 18 Member States (MS) are facing in achieving the Waste Framework Directive and Packaging and Packaging Waste Directive targets. We believed that one of the reasons was not utilizing the full potential of EPR.

In preparation for the next Early Warning report, assessing Member States' progress towards reaching the 2030 recycling targets of municipal waste and packaging waste, and also the waste reduction targets for packaging, EXPRA would like to express its views and perspectives on the attainment of such targets and associated good practices by Member States through EPR schemes.

Executive Summary

To further improve waste management systems in order to reach EU prevention and recycling targets, EXPRA recommends that policymakers:

- **Recognise the role of EPR in supporting the implementation of well functioning waste management systems to reach** the European waste prevention and recycling targets, acting as a vital catalyst for the circular economy.
- **Enforce the Waste Framework Directive EPR minimum requirements across the Union** to ensure the development of effective EPR schemes in an harmonised manner creating the right conditions to release the full potential of EPR in reaching circular economy targets.
- **Improve EPR efficiency by not limiting EPR schemes to financing mechanisms but rather, when the conditions are met, provide the possibility for PROs to actively support and manage the operational model of waste management** —

overseeing or closely coordinating the collection, sorting, and recycling infrastructure to guarantee high-quality secondary raw materials.

- **PROs must be not-for-profit entities owned and governed directly by the obliged industry**. EXPRA opposes State-run PROs operating without a producer mandate, as they substitute an effective EPR model with an opaque taxation system.

- **EPR schemes can play a key role in accompanying companies to reduce packaging waste and contribute in reaching the Member State's objectives**. EXPRA stresses good practices implemented in different Member States by PROs to contribute to waste prevention, including providing to producers services in terms of waste prevention, developing and/or financing pilot projects for improving the ecodesign of packaging and leading reuse project developments.

- **Member States must deploy the right financial, and technical levers to scale up their recycling performances, including with the help of an effective and well-functioning EPR scheme**. EXPRA stresses that achieving the "recycling at scale" obligation of the Packaging and Packaging Waste Regulation, across all 27 Member States, is achievable if national authorities adopt established best practices based on EPR front runners' performance and implement the right levers to boost recycling performances. Such good practices, developed by EXPRA members, include close collaboration between local authorities and the PRO to improve the quality of collected materials, increased focus on the recyclability of packaging, the promotion of recycling at local level or even a pivotal role in the development of new recycling streams.

Releasing the full potential of EPR to reach European targets

The Waste Framework Directive (WFD) 2008/98/CE, revised in 2018, provides for measures to tackle the harmful effects of waste production and management on the environment and human health and to improve the efficiency of resource use.

Pursuant article 11 of the Waste framework Directive:

- By 2025, the preparing for re-use and the recycling of municipal waste shall be increased to a minimum of 55 % by weight;
- By 2030, the preparing for re-use and the recycling of municipal waste shall be increased to a minimum of 60 % by weight;
- By 2035, the preparing for re-use and the recycling of municipal waste shall be increased to a minimum of 65 % by weight.

In this context, EXPRA underlines the important role EPR plays in supporting the implementation of well functioning waste management systems, in meeting the European waste prevention and recycling targets, acting as a vital catalyst for the circular economy. EPR schemes finance and, in many cases, organise essential environmental services. These include the collection, sorting and treatment of waste, as well as activities linked to recycling, reuse, prevention and awareness-raising.

The Article 8a of the WFD on the minimum requirements for EPR provides for the legal framework in accompanying the development of effective EPR schemes in an harmonised manner. However, EXPRA regrets that several Member States, such as Poland or Croatia, have still failed to fully transpose and implement these provisions, and thus have not established EPR schemes for packaging in compliance with the WFD minimum requirements ensuring the full potential of EPR in reaching circular economy targets.

The current framework risks leaving room for systems that impose financial responsibility on producers without being fully subject to the governance, transparency, reporting, cost-control and accountability obligations that apply to EPR schemes.

EXPRA reaffirms that well-structured EPR systems can fully support Member States in overcoming technical and operational hurdles, enforcing regulatory requirements, and meeting waste targets. A key precondition for this is a stable and reliable legislative and executive framework provided by the Government.

EXPRA asks to ensure that any system in which producers finance and/or organise waste management should, regardless of its form, be subject to the minimum EPR requirements.

In addition, to fully unlock the potential of EPR in meeting the EU's 2030 targets, **EXPRA advocates for EPR schemes grounded in robust governance, operational ownership, and strict transparency,** as reflected in EXPRA's Golden Rules for EPR, in particular :

- EXPRA believes that **EPR schemes must not be reduced to financing mechanisms**. To drive genuine efficiency, PROs should actively support and manage the operational model of waste management when conditions are met —overseeing or closely coordinating the collection, sorting, and recycling infrastructure to guarantee high-quality secondary raw materials. They also have a role to play in waste prevention. PROs must retain the operational capacity to identify and define the necessary levers to meet legal targets. In particular, they should have the capacity to design appropriate collection systems in practical and close cooperation with municipalities, ensuring for instance that eligible collection cost categories are transparently agreed in advance.
- **PROs must be not-for-profit entities owned and governed directly by the obliged industry**. Financial revenues and eco-modulated fees generated by the system should be reinvested into optimizing circularity and infrastructure, rather than extracted as corporate profit for PROs.
- **High performance requires transparency regarding material and financial flows**. This is particularly the case for State-owned PROs, operating without producer's mandate, fail to align with core EPR principles, such as transparency. Given that the money collected would fall under the taxation model, it is not a dedicated financial model that helps producers fulfill producers' responsibilities to meet recycling targets on their behalf . It contradicts the principles of EPR which has proven its effectiveness for over 30 years.

EPR good practices in helping reaching the European targets

The Packaging and Packaging Waste Regulation (2025/40) sets out waste prevention targets whereby Member States shall reduce the packaging waste generated per capita, as compared to the packaging waste generated per capita in 2018 by at least:

- 5 % by 2030;
- 10 % by 2035;
- 15 % by 2040.

As a prerequisite, and in order to ensure a harmonised implementation of the waste prevention target, EXPRA calls the European Commission to closely work with Member States to ensure that the same methodology is used to measure packaging waste generated both in the base year (2018) and the target years (2030–2040).

Pursuant to the above-mentioned objectives to reduce and prevent packaging waste, EPR scheme can play a key role in accompanying companies to reduce packaging waste and contribute in reaching the Member State's objectives. However, Member States remain the ultimate responsible party to reach the targets and, pursuant to PPWR, PROs are not accountable.

In this perspective, and aligned with the waste hierarchy principles, **EXPRA members are committed to provide producers services in terms of waste prevention**, such as:

- **In France, CITEO** is committed to implementing reuse at the national level by introducing in spring 2025 a national reuse scheme for supermarkets in Pays-de-la-Loire, Brittany, Normandy & Hauts-de-France regions for food products, including the introduction of standardised reusable packaging. Citeo not only organises working groups with companies to foster innovation in packaging in relation to reduction but it also finances waste prevention projects to support businesses and help them reduce their packaging, and in particular it funds practical innovations aimed at bringing minimized packaging to market, such as eliminating group packaging for batches, switching to larger formats, and moving from rigid to flexible packaging, etc.
- **In Belgium, Fost Plus** assists members in making packaging more sustainable: packaging reduction, removal of overpackaging, reduction of empty space, material efficiency, reuse or refill solutions and design for recycling. The services including coordination, consulting, coaching, best practice development, field trips to leading companies, and a matchmaking tool to connect businesses with relevant partners. For reduction and reuse, they run pilot projects, such as the launch of reusable mushroom trays in 2026 or BringMeBag, a test with reusable e-commerce packaging.

These are only a few of the EXPRA members' activities on waste prevention across the EU territory.

On recycling, the PPWR also provides for ambitious recycling targets combined with recyclability requirements for packaging in 2030 and recycling at scale requirements by 2035, in particular (by weight):

- 55 % of plastic;
- 30 % of wood;
- 80 % of ferrous metals;
- 60 % of aluminium;
- 75 % of glass;
- 85 % of paper and cardboard.

Concretely, and pursuant to article 6 of PPWR, this framework dictates that from 2030, packaging placed on the Union market complies with the Design for Recycling (DfR) criteria. **By 2035, compliance will further depend on proving that packaging waste is effectively recycled at scale**—requiring state-of-the-art separate collection, as well as sorting and recycling processes proven in operational environments that yield an annual recycled output of at least 30% for wood and 55% for all other material categories.

This means that failure to reach the recycling at scale objectives, targeted packaging will be banned on the EU market.

Therefore, Member States must deploy the right financial, and technical levers to scale up their recycling performances, including with the help of an effective and well-functioning EPR scheme.

EXPRA stresses that achieving "recycling at scale" across all 27 Member States is achievable if national authorities adopt established best practices based on front runners' performance and implement the right levers to boost recycling performances. It is important that Member States that perform well should not be penalised for the lack of performance of other Member States.

We have identified - amongst others - the following measures which are a prerequisite for achieving the recycling targets:

- **CONAI** reports that Italy recycled 10.97 million tonnes of packaging in 2025, representing 77.3% of packaging placed on the market, alongside strengthening support for municipal collection and reuse. This achievement reflects consistent progress across all material streams. Close collaboration between Conai and local authorities in delivering these outcomes has been pivotal to attaining these targets. It has been reinforced by the deployment of a **new national EPR Agreement in 2026 with local authorities with a greater focus on the quality of collected materials** supported by more sophisticated incentive and penalty mechanisms.
- **Verpact** reports a packaging recycling rate of 75% in 2025, underlining its effort to ensure the recyclability of packaging placed on the Dutch market. Verpact collaborates with producers to **enhance recyclability** of packaging by providing advice and concrete guidelines about how to make packaging more sustainable and more recyclable. In addition, they also support recyclable plastic packaging by means of financial incentives with ecomodulation of EPR fees.

- **Fost Plus** reports in its activity report that Belgium achieved a 74% recycling rate for plastic packaging in 2025 (relative to its members). **Recycling at a local level forms a cornerstone of this performance**, with 51% of these plastics recycled in Belgian recycling plants. Additionally, no plastic packaging material marketed by Fost Plus is exported beyond EU borders.
- **In France, Citeo** became operational for plastic packaging that did not have recycling solutions, such as flexible packaging, to boost the development of recycling streams and ensure that recyclers equipped with the right technologies will be supplied with raw materials. In 2025, the dedicated recycling streams for PS pots and single-layer PET trays became operational. It helped in increasing the recyclability of plastic packaging in France from 65% to 75%.

EXPRA calls the European Commission to push Member States to use proven models in order to reach the environmental targets, drastically reduce carbon emissions and increase resource availability while reinforcing the European secondary raw materials market.

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