



To: Frans Timmermans, Executive-Vice-President of the European Commission  
 Virginijus Sinkevičius, Commissioner for Environment

Brussels, 19 April 2023

**Subject: Waste Framework Directive - Inclusion of bio-waste targets needed**

Dear Executive-Vice-President Timmermans,  
 Dear Commissioner Sinkevičius,

In order for EU Member States to meet the EU municipal waste recycling target of 65% by 2035, effective bio-waste collection and treatment is absolutely essential. We, the undersigned, deem it therefore crucial that the European Commission mandates **targets for reducing the volume of bio-waste found in the mixed/residual** (non-recyclable) waste\*, within the current revision of the **Waste Framework Directive**.

The signatories of this letter are deeply concerned about the fact that, although bio-waste separate collection will be mandatory in the EU as of 1st of January 2024, this mandate is not supplemented by a concrete target. As a result, this mandate may be complied with by simply offering poor performing collection schemes that do not address the issue substantially. Since bio-waste is the most important fraction of municipal waste, evidence shows that **it will not be possible to meet the 65% recycling target unless most bio-waste is captured**. [A recent survey assessed that only 34% of the total bio-waste was collected in 2018](#), hence, leaving 40 million tonnes of potential soil nutrients to end up polluting the environment. Poorly performing systems

result in a high percentage of bio-waste remaining in the mixed/residual waste bin , which amounts to more than one third, even in countries with a long-standing obligation.

Therefore, to incentivise the proper collection and recycling of bio-waste, we recommend adopting a **binding reduction target on the amount of bio-waste included in mixed/residual waste** (i.e., before landfill, incineration or mechanical and biological treatment). Such a cap should be set at 25kg per capita by 2030 and 15kg per capita by 2035 of the maximum amount of bio-waste in mixed/residual waste per year. A target expressed in absolute numbers (kg/capita) would account for contributions from food waste reduction programmes and home or community composting initiatives. A relative target would instead create the wrong incentive to hamper the overall reduction of mixed/residual waste.

**We therefore call on the European Commission to provide the right guidance and tools so that Member States can achieve the recycling targets, by mandating specific reduction targets for bio-waste found in mixed/residual waste within the upcoming revision of the Waste Framework Directive.**

We would be very happy to discuss this further with you at your best convenience.

Yours sincerely,

*The undersigned,*

- Malte Gallee, MEP (Greens/EFA)
- Sirpa Pietikainen, MEP (EPP)
- Sarah Wiener, MEP (Greens/EFA)
- Eloi Badia, Àrea Metropolitana de Barcelona (AMB)
- Kik Arnoud, Avalex
- Ellen Verkooijen, Circ
- Franco Amigoni, Comune di Fidenza
- Mayor Giuseppe Sala, Comune di Milano
- Massimo Centemero, Consorzio Italiano Compostatori
- Percy Foster, Cré - Composting & Anaerobic Digestion Association of Ireland
- David Newman, European Bioeconomy Bureau (EBB)
- Lucile Sever, European Biogas Association (EBA)
- Jaka Kranjc, Ekologi Brez meja
- Yvonne Leenaars, EURECO
- Jon Kortajarena, Garbitania
- Isaac Peraire, Agencia de Residus de Catalunya

- Mojmír Jiříkovský and Marian Koblka, JRK
- Rutger Geelen, Mago Bio Solutions
- Nestlé
- Catia Bastioli, Novamont
- Paolo Contò, Consiglio di Bacino Priula
- Piotr Barczak, Polish Zero Waste Association
- Cecile Gotteland, Reseau Compostplus
- Sylvain Guinaudie, SMICVAL
- Wolfgang Ringel, TOMRA
- Haniyeh Jalalipour, Universitat Rostock
- Susana Fonseca, ZERO - Association for the Sustainability of the Earth System
- Joan Marc Simon, Zero Waste Europe
- Alice Elfassi, Zero Waste France
- Rossano Ercolini, Zero Waste Italy
- Eloi Badia, City of Barcelona

\*by mixed/residual waste we refer to non-separately collected waste a fraction of which can still be recycled.

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## TECHNICAL INFORMATION

### Annex 1: Examples

#### [The City of Milan](#)

Milan, despite a relatively complex context due to housing conditions, density of population, number of daily commuting workers, and annual visitors, already achieved around 10% organics in mixed/residual waste (including materials classified as 'kitchen waste' and 'garden waste'). Considering that mixed/residual waste in Milan amounts to less than 200 kgs/person, this implies less than 20 kgs organics/person/year in mixed/residual waste.

#### [The City of Ljubljana](#)

Ljubljana achieved an average of 15 kg of biowaste in mixed/residual waste. This measure would only require one additional compositional analysis of mixed/residual waste and, hence, not inflate costs for municipalities.

### Annex 2: Relevant studies

#### [How to best collect bio-waste \(2022, Zero Waste Europe\)](#)

[Unwrapping the biowaste potential \(2022, European Circular Bioeconomy Policy Initiative\)](#)

[Bio-waste generation in the EU - current capture and future potential \(2020, Bio-based Industries Consortium, Zero Waste Europe\)](#)