MANIFESTO

Break the single-use bias: Europe's Prevention Pioneers demand EPR Reform to support packaging waste prevention and reuse

Addressed to Teresa Ribera, the Executive Vice-President for a Clean, Just and Competitive Transition and Jessika Roswall's, the Environment, Water Resilience and a Competitive Circular Economy commissioner

When the EU Single-Use Plastics Directive was approved in 2019, policymakers faced the challenge of limited real-world evidence of effective reuse & waste prevention policies. The reuse sector was still in its infancy, with very little data to demonstrate the economical, social and climate benefits these measures could have across European contexts. Now, five years later, the EU Packaging & Packaging Waste Regulation marks progress, but the inclusion of legally-binding reuse and packaging waste prevention targets lack the tools needed to achieve a fast and just transition away from today's wasteful, single-use model.

We, the cities signing this manifesto, are at the forefront of Europe's transition towards a more circular, healthier and competitive economy. Together with partners from the private sector, the investment community and civil society, we are already implementing proactive measures to reduce our dependence on single-use. These actions include innovative public procurement, reuse systems for events and the HoReCa sector, bans on single-use items in public buildings, and support to businesses transition to packaging-free practices.

However, we face major challenges, **as single-use packaging remains the default and cheaper market option, with its true environmental, social and health externalities not being accounted for by producers**. As a result, local public authorities are left to bear the consequences: a 27% rise in packaging waste over the past decade, cleanup costs, and mounting environmental damage. Meanwhile, the very solutions that could address this crisis - waste prevention policies and reuse systems - struggle to scale, hindered by an economic system that rewards waste rather than reducing it.

Without a more supportive legislative environment at the European level, our efforts will stay small and fragmented, falling short of the systemic changes we urgently need. In particular, we urge improvements to Extended Producer Responsibility (EPR) schemes transforming them from basic waste management tools into powerful levels for resource management, actively driving packaging reuse and prevention through dedicated funding that ensure these solutions are scalable and competitive.

We therefore call upon the European Commission to prioritise the following 3 key actions within the announced Circular Economy Act:

1

Full cost coverage

The EU should mandate EPR systems to cover the full costs of packaging waste, including litter clean-up, mixed-waste stream treatment costs, and collection costs of packaging that cannot be reused, repaired, or recycled. Currently these costs fall on municipalities and taxpayers, as Producer Responsibility Organisations (PROs) typically cover only part of the system. Addressing these gaps would reduce the burden on the local budget.

2

Economic levers for packaging reuse and prevention

Current eco-modulation fees have failed to significantly improve packaging design and curb the dominance of single-use products. To change this the EU should introduce an additional, harmonised environmental fee, on top of the collection and treatment costs (which are set at national level). This fee would be based on the packaging's environmental impact (e.g. litterability, carbon footprint). The revenue would be used to support the shift to a circular economy by funding, for example, reuse infrastructures. This would help local authorities by making refill and reuse solutions more economically viable and easier to implement.

3

Enhance governance and stakeholder inclusion

The EU should ensure that there is greater accountability and transparency embedded within the governance of PROs, to help make sure they reflect the realities of those most affected by the implementation of EPR systems. This should include a protected role for municipalities in the governance of PROs, most suitably through one voice such as the national association of local municipalities. As a minimum, municipalities should be consulted and have a chance to provide meaningful feedback but ideally, it should be a role with enshrined voting powers in decision-making processes.

By reforming EPR schemes as we've outlined, the EU can unlock the potential of circular economy innovations across the continent. These reforms would not only relieve financial pressure on local authorities but create favorable conditions for solutions that prevent waste at its source.

By taking such decisive action we can break the single-use bias and build, together, a resilient, competitive and resource-efficient Europe.

Sign the manifesto

Signed for Zero Waste Europe

Date:

Name:

Signature:

Signed for Brussels City

By the Counsil

Municipal Secretary

Dirk LEONARD

The Council

Alderman for Climate

Frederik CEULEMANS