ZERO WASTE EUROPE

Extended Producer Responsibility for food products

Policy recommendations

Position paper

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Introduction

The European Union faces a critical moment in food waste prevention and management. Not only do EU citizens generate 129 kg[1] of food waste per capita annually, contributing to 8-10% of global greenhouse gas emissions attributed to food waste,[2] but the systems to capture food waste are also insufficient. Generated bio-waste is too often lost in the mixed waste stream, a missed opportunity to supply the EU economy with nutrients for soils, biomaterials, and biogas.

Despite the mandatory separate collection of all bio-waste in the EU since 2024, only 26% of kitchen waste is successfully captured. This brings the current collection to just 15.1 million tonnes annually, which is far below the theoretical potential of 60 million tonnes.[3]

Moreover, in 2025, the EU established legally binding food waste reduction targets for 2030, including a 30% reduction per capita at household, retail, and restaurant levels; and a 10% reduction at the manufacturing level.[4]

Yet, the implementation of both reduction and management measures is facing significant economic barriers, as businesses and municipalities lack financial incentives to establish prevention plans and set up efficient separate collection schemes. The overhead costs alone often discourage local authorities from adopting the necessary measures.

To address this dual challenge, the **forthcoming EU Circular Economy Act offers a unique opportunity to introduce Extended Producer Responsibility for Food Products (EPRFP) across the Single Market.** This measure could partially shift the financial responsibility from public authorities and taxpayers to food producers and retailers, who have significant influence over consumer behaviour and waste generation patterns. As such, the foreseen amendment of the Waste Framework Directive (WFD) through the Circular Economy Act must become the next step towards a holistic policy response to the current challenges of our food systems.

[1] "Food waste in Europe: facts, EU policies and 2030 targets'. 2025. European Parliament. www.europarl.europa.eu/pdfs/news/expert/2024/3/story/20240318ST019401/20240318ST019401_en.pdf

[2] i: 'Emissions associated with food loss and waste are included implicitly, since emissions from the food system are related to food produced, including food consumed for nutrition and to food loss and waste. The latter is estimated at 8–10% of total anthropogenic emissions in CO2eq. See: "Summary for Policymakers — Special Report on Climate Change and Land." . 2019. United Nations' Intergovernmental Panel on Climate Change www.ipcc.ch/srccl/chapter/summary-for-policymakers

[3] "Bio-Waste Generation in the EU: Current Capture Levels and Future Potential - 2nd Edition". 2024. Bio-based Industries Consortium (BIC) and Zero Waste Europe. zerowasteeurope.eu/library/bio-waste-generation-in-the-eu-current-capture-levels-and-future-potential-second-edition

[4] "Food Waste Reduction Targets." 2025. European Commission. food.ec.europa.eu/food-safety/food-waste/eu-food-waste-relevant-legislation/food-waste-reduction-targets_en

Expected benefits of EPRFP

- **Environmental impacts,** including:
    - Positive climate and land use impacts of the avoided food production;
    - Millions of tonnes of food waste diverted from landfills and incinerators, which can reduce methane and CO_2 emissions from both disposal and upstream production;
    - Soils benefitting from regeneration through compost application;
    - Improvement in the recycling of other municipal waste streams;
    - Reducing pressure on virgin feedstocks by replacing them with new biomaterials;
    - The replacement of fossil fuel use with biogas.
- **Economic gains and job creation** through:
    - Expected shifts in cost coverage from municipalities to producers;
    - Creation of prevention incentives (better planning of sales volumes, date marking, portion sizes, and food redistribution);
    - Increasing the cost-efficiency of collection systems;
    - Providing stable funding for infrastructure development, waste management jobs, and business opportunities for bioeconomy actors.
- **Driving innovation through investments in research** financed by EPR fees to stimulate food waste reduction and circular food systems.
- **Optimisation of bio-waste collection and recycling systems,** which can reduce contamination of dry recyclables (which won't be soiled with food waste) and allow for reduced collection frequency for other waste streams.
- **Strategic autonomy**: reduction of dependency on imports of fertilisers and other feedstocks for biomaterials and recovery of critical raw materials, such as phosphorus.

Current barriers to food waste prevention

According to the EU-funded FUSIONS[5] project, achieving sustainable financing for socially innovative food waste prevention projects remains the primary obstacle to greater food waste prevention. Currently, funding for food waste reduction comes almost entirely from public authorities, fully placing the burden on taxpayers while food producers and retailers (who significantly influence consumer behaviour and waste generation) bear no financial responsibility. This misalignment of incentives was partly addressed by:

- The introduction of the binding EU-wide 10% food waste reduction target for the processing and manufacturing sectors;
- The 30% reduction target for food waste at the household, retail, and restaurant levels.

However, this left room for interpretation as to how the costs shall be covered. Municipalities and local authorities often lack the economic incentives and means to invest in prevention programmes, food redistribution schemes, consumer education campaigns, or innovation research.

Without dedicated funding streams that shift partial financial responsibility to actors who profit from food sales regardless of the eventual waste generation, the EU's food waste prevention targets risk remaining unfulfilled.

Current barriers to bio-waste collection

Economic barriers are central in preventing the widespread implementation of separate bio-waste collection across Europe. The LIFE BIOBEST[6] project identified that the lack of financial incentives for local authorities, combined with the higher costs of bio-waste collection compared to residual waste treatment, creates fundamental obstacles. Member States are therefore not fulfilling their obligation to separately collect bio-waste; and without appropriate economic strategies in place, the EU will not achieve its circularity and bioeconomy objectives.

[5] "Food Use for Social Innovation by Optimising waste prevention Strategies" 2021. CORDIS. European Commission. cordis.europa.eu/project/id/311972
[6] The LIFE BIOBEST project. 2024-2025. LIFE BIOBEST. www.lifebiobest.eu

Policy recommendations

1. Implement a comprehensive EPRFP with a clear scope

- Apply EPR to all solid food products likely to end up in bio-waste collection, including fresh produce, baked goods, meat and fish products, prepared foods, and used cooking oils. Liquids and semi-liquids that don't enter separate collection streams shall be excluded.
- Place EPR obligations on:
    - Wholesalers placing food products on the market.
    - Importers placing food products on the market.
    - Retailers for the sale of their own white label products.

  Producers, direct farm-to-consumer sales, and the HORECA sector shall be excluded from EPR obligations.
- Adopt comprehensive cost coverage, including:
    - Collection and recycling of food waste.
    - Research and innovation in waste management and reduction technologies.
    - Food waste prevention programmes (social meal initiatives, food bank support, redistribution schemes and businesses, etc.).
    - Consumer awareness-raising campaigns.
    - Public bin and litter management linked to food takeaway consumption.

2. Set targets for the volume of bio-waste found in residual (mixed) waste

Despite Article 22 of the Waste Framework Directive mandating bio-waste to be separately collected since January 2024, there is insufficient clarity on how much bio-waste should be collected. In the absence of a clear target, many countries and local authorities have interpreted this obligation as only needing to provide the possibility for citizens to separate bio-waste. This may count as "compliance", but in practice, this omission allows local authorities to meet the obligation by placing one bio-waste container in an entire municipality or by using street containers that collect low volumes of waste and are high in impurities.

Current collection results and feedback from stakeholders[7] show the need to set specific targets to incentivise municipalities to implement optimised separate collection schemes.

We therefore recommend establishing a **target of no more than 25 kg of bio-waste present in residual waste by 2035, with an interim target of 50 kg by 2030.**[8] These targets would complement the existing food waste reduction targets. Bio-waste in the residual waste stream is easily measured through mixed waste surveys, and the target incentivises both waste prevention and recycling, promoting a shift away from disposal.

3. Mandate immediate EPRFP implementation

To fast-track access to the nutrients present in bio-waste, reduce emissions from landfills and incinerators, and provide the financial means for the food waste reduction targets to be achieved, Zero Waste Europe recommends that the EU mandate EPRFP implementation immediately in all Member States, to reach the target of a maximum of 50 kg of bio-waste in residual waste and meet the food waste reduction targets by 2030.

The immediate mandate prevents municipalities from delaying separate collection investments while waiting for EPR funding. Evidence from the mandatory separate collection of textiles shows that announcing future EPR schemes leads

[7] "Bio-Waste Generation in the EU: Current Capture Levels and Future Potential - 2nd Edition". 2024. Bio-based Industries Consortium (BIC) and Zero Waste Europe. zerowasteeurope.eu/library/bio-waste-generation-in-the-eu-current-capture-levels-and-future-potential-second-edition

[8] i: current average-performing schemes with dedicated separation of food waste, such as Milan or Parma, achieve between 10 and 15 kg of bio-waste in residual per capita per year. Less performing systems with a dedicated separate collection of bio-waste achieve between 30 and 60 kg (60 kg in the Netherlands, 45 kg in Germany or 30 kg in Austria). Best-performing schemes, such as Treviso, achieve 3 kg bio-waste in residual waste.

to the postponement of publicly-funded collection infrastructure.[9] To achieve the 2030 targets, funding must be available as soon as possible.

4. Establish a strong EPRFP legal and governance framework

The EPRFP system must include:

- Precise definitions to reduce uncertainty around responsibilities and obligations, including the clarification that the scope excludes liquids and semi-liquids despite the broader food waste definition.
- Strong and binding legislation defining producer obligations and guaranteeing enforceability, with clarity on who is responsible for achieving targets, and that public authorities can enforce.
- Efficient, transparent, and inclusive governance structures with Producer Responsibility Organisations (PROs) that retailers can trust, and that pay recyclers and redistributors fairly.
- Clear monitoring, reporting, and enforcement guidelines, with penalties for non-compliance and dispute resolution mechanisms.

Conclusion

EPRFP is an essential economic instrument to address the EU's food and bio-waste challenges by creating dedicated funding streams for prevention and collection activities while aligning financial responsibility with actors who have significant influence over waste generation. The forthcoming EU Circular Economy Act must introduce a financing mechanism that contributes to achieving the 2030 food waste reduction targets while advancing the EU's circular economy and bioeconomy strategies. Immediate implementation across all Member States offers the best pathway to meeting 2030 targets and providing municipalities with the resources needed to establish collection schemes.

[9] "Transposing Textiles EPR: The EU State of Play in 2025." 2025. Zero Waste Europe. zerowasteeurope.eu/library/transposing-textiles-epr-eu

Zero Waste Europe (ZWE) is the European network of communities, local leaders, experts, and change agents working towards a better use of resources and the elimination of waste in our society. We advocate for sustainable systems; for the redesign of our relationship with resources; and for a global shift towards environmental justice, accelerating a just transition towards zero waste for the benefit of people and the planet.
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