

CALL FOR EVIDENCE FOR AN INITIATIVE (without an impact assessment)

This document aims to inform the public and stakeholders about the Commission's work, so they can provide feedback and participate effectively in consultation activities.

We ask these groups to provide views on the Commission's understanding of the problem and possible solutions, and to give us any relevant information they may have.

TITLE OF THE INITIATIVE	Waste – early warning report
LEAD DG – RESPONSIBLE UNIT	DG ENV - B.3 Circular Economy & Secondary Raw Materials
LIKELY TYPE OF INITIATIVE	Report to the Council and European Parliament
INDICATIVE TIMING	Q4-2027
ADDITIONAL INFORMATION	https://environment.ec.europa.eu/topics/waste-and-recycling_en

This document is for information purposes only. It does not prejudice the final decision of the Commission on whether this initiative will be pursued or on its final content. All elements of the initiative described by this document, including its timing, are subject to change.

A. Political context, problem definition and subsidiarity check

Political context

The Waste Framework Directive, Packaging and Packaging Waste Regulation and the Landfill Directive include the concept of 'early warning reports' (EWR) to be drawn up by the Commission at the latest three years before the deadline of each target. The objective of an EWR is to assess Member States' progress towards reaching the 2030 recycling targets of municipal waste and packaging waste, waste reduction targets for food and packaging waste and the 2035 landfill target. The report will list Member States at risk of not attaining the targets within the respective deadlines and provide recommendations for Member States to improve their waste management performance, including by sharing best practice.

The [Environmental Implementation Report](#) (EIR) provides a context for an analysis, dialogue and collaboration between the European Commission, EU Member States and stakeholders based on the published country reports. The EIR has a wider scope than the EWR, covering all essential topics in environmental policy and law in each EU Member State, and includes a chapter on waste in general.

This EWR is specific to municipal waste, food waste, packaging waste and landfilling. The EWR will focus on the national information and policies that have a direct impact on the prospects of achieving the municipal waste and packaging recycling targets, the packaging and food waste reduction targets and the landfill targets and will have a specific Annex for each Member State considered at risk of not reaching any of the targets.

Problem the initiative aims to tackle

The early warning report 2023 considered that 8 Member States were at risk of only missing the municipal waste target only – Estonia, Finland, France, Ireland, Latvia, Portugal, Spain and Sweden; while 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.

Despite efforts at EU and national level, the amount of waste generated has not decreased between 2010 and 2022 ⁽¹⁾. The European Environment Agency's (EEA) [reviews on waste generation and decoupling in Europe](#) show that, while the EU as a whole and many individual countries have achieved a relative decoupling of waste generation from economic growth, the EU is not set to meet its policy goal of reducing waste generation. To reach the ambitious goal of halving the amount of municipal waste that is not recycled by 2030, the EU Member

¹ [Waste statistics - Statistics Explained - Eurostat, https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Waste_statistics#Waste_generation_excluding_major_mineral_waste](https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Waste_statistics#Waste_generation_excluding_major_mineral_waste)

States need to reduce municipal waste generation and considerably increase recycling. According to Eurostat data, in 2023, only 40% of municipal waste and 64% of packaging waste was recycled with the figures varying considerably among Member States - ranging from 12% to over 63% for municipal waste and from around 30% to over 80% for packaging waste. This means that lost resources cannot re-enter the EU economy. The Eurostat data also show insufficient progress in reduction of food waste compared to the recently adopted food waste reduction targets as set out in Article 9a(4) of Directive 2008/98/EC as amended in 2025.
Basis for EU action (legal basis and subsidiarity check)
Legal basis
The early warning mechanism is a legal obligation on the Commission to report on Member States' performance and their prospects to meet waste reduction, preparing for re-use and recycling, and landfilling targets. The early warning mechanism obligations are laid out in the following acts: - Article 11b of Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives on municipal waste and food waste - Article 6b of European Parliament and Council Directive 94/62/EC of 20 December 1994 on packaging and packaging waste - Article 5b of Council Directive 1999/31/EC of 26 April 1999 on the landfill of waste
Practical need for EU action
The EWR aims to guide Member States in implementing measures that can improve their performance on waste prevention and management and, specifically, improve recycling rates and reduce both disposal and reduce food waste across the EU.
B. What does the initiative aim to achieve and how
The EEA, supported by its European Topic Centre on Circular Economy and Resource Use (ETC/CE), has developed a methodology to assess Member States' prospects of reaching the targets set in the legislation mentioned above. This consists of a list of quantitative and qualitative success and risk criteria (based on 2024 data) used to assess the likelihood that each Member State will achieve the 2030 recycling targets and the 2035 landfill target. The EWR is meant to alert Member States by providing a more detailed assessment of their waste policy than the waste chapter included in the Environmental Implementation Report. The EWR will identify Member States at risk of not meeting the targets. In addition, the report will be complemented with Annexes to provide general and country-specific recommendations to improve performance and achieve the targets.
Likely impacts
This initiative does not propose any new policy objectives. It aims to help Member States achieve the existing objectives and targets set in waste legislation. Therefore, this initiative will not generate new impacts on stakeholders that have not already been assessed in preparation for the 2018 proposal and the 2025 amendment of the WFD, as well as the packaging and packaging regulation adopted in 2024.
Future monitoring
No additional monitoring is envisaged.
C. Better regulation
Impact assessment
An impact assessment will not be carried out as this initiative is not a legislative proposal and there are no new objectives nor policy choices to be proposed.
Consultation strategy
The EEA will consult Member States through a questionnaire on the state of play of their implementation in view of meeting the municipal waste and landfill targets. In addition, the Commission has commissioned a study that includes the task to present the EEA country assessments to (mainly) national stakeholders. The consultations will focus on requesting stakeholders' input on what they think general and country-specific recommendations should be – to support Member States in their effort to improve waste prevention, separate collection, sorting

and recycling, with a view to achieving the targets.

This call for evidence is intended to gather public feedback on this initiative. Particularly, the Commission welcomes input on what implementation challenges are present in the Member States and which measures they would suggest those Member States could put in place to improve their waste management performance.