

Amendment to the Waste Framework Directive

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The Directive (EU) 2025/1892 of the European Parliament and of the Council of 10 September 2025, amending Directive 2008/98/EC on waste (hereinafter, the Waste Framework Directive), has been published.

This amendment to the Waste Framework Directive follows the publication, on 30 March 2022, of the *EU Strategy for Sustainable and Circular Textiles*, in which the European Commission highlighted the need for producers of textile products to take responsibility for the waste generated by those products, with a view to creating a circular economy based on the collection, sorting, reuse, preparation for reuse, and recycling of textiles.

The main changes are essentially as follows:

1. Producers of certain **textile products (including footwear)** will be subject to the **Extended Producer Responsibility (EPR)** scheme for the products they place on the market for the first time;
2. Member States may establish an EPR scheme for **mattress** producers;
3. Member States must create a **producer register**, and producers will be required to register;
4. Producers must ensure compliance with their obligations under the EPR scheme through **integrated management systems** for this new specific waste stream, to be duly licensed for that purpose;
5. Producers will be required to cover certain **costs**, including: (i) collection for reuse purposes, (ii) transport of used and waste products, (iii) sorting, preparation for reuse, recycling, other operations, and disposal, (iv) collection, transport, and treatment of waste by social economy entities and other operators that are part of the collection system.

These new rules will only apply to companies with fewer than 10 employees and with an annual turnover and annual balance sheet not exceeding EUR 2 million as **from 17 April 2029**.

Furthermore, the Directive must be transposed into national legislation by the Member States by **17 June 2027**, and it is expected that the integrated management systems for this new specific waste stream will be operational by mid-2028.

It is also worth noting that, although it has never been implemented, in Portugal, the Unified Regime for Specific Waste Streams previously provided, before the amendment introduced by Decree-Law No. 24/2024 of 26 March, that the Government should adopt, by 31 December 2024, the legislation necessary to integrate the textile waste stream into the Extended Producer Responsibility systems. Additionally, regarding the EPR for mattresses and related waste, such a regime is already foreseen under the Unified Regime for Specific Waste Streams.

In summary, the main innovation introduced by this amendment is the establishment, in the near future, of an Extended Producer Responsibility scheme for the specific waste stream of textiles, the implementation of which had already been anticipated in Portugal but has not yet been effectively realized.



Thinking about tomorrow? Let's talk today.

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