

## Towards effective EPR-schemes in the Nordic-Baltic region

Nordic Council of Ministers' Office in Latvia

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## About me and status on EPR in Norway









1993 / 1995: EPR for batteries by regulation / EPR for packaging by industry agreements. Norway was among the first countries in the world with producer responsibility schemes.

2021 - 2025: "Wasted Textiles" SIFO/Oslo Met Research Project, funded by The Research Council of Norway and the Norwegian Retailers' Environmental Fund Sept 2022- sept 2023: Government-appointed working group evaluating EPR for textiles

May, 2025: Stakeholder consultation on EPR from the Norwegian Environment Agency (EPA)

August, 2025: Major textile retail chains in cooperation with the Federation of Norwegian Trade and Service Industries, Virke, establishes a PRO-organisation.

## Myths:

- 1. EPR is something new ("extended")
- 2. EPR will solve the environmental problems of the (fast) fashion industry

## **Key questions:**

Can EPR-fees take into consideration **usetime** (lifespan)? How should we **assess the fees** and in particular **eco-modulation**?



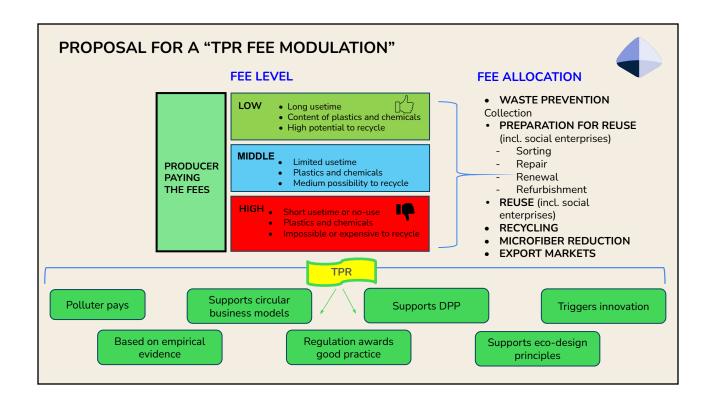
TPR-pilot 2023 - report





Sirk Norge









- EPR can be used as an effective environmental policy instrument
- **But:** What is the **legal / political room for maneuver** in the revised *Waste Framework Directive* scheduled for approval in plenary October 6?
- Key questions: What cost can be covered? Who assesses the cost, other than the textile (+recycling) industry? What can be eco-modulated and how?

The devil is in the details...

WFD, page 21: "The purpose of the extended producer responsibility for textile, textile-related and footwear products is to ensure a high level of environmental and health protection in the Union, create an economy for collection, sorting, re-use, preparing for re-use and recycling, in particular, fiber-to-fiber encycling, as well as incentives for producers to ensure that their products are designed in respect of circularity principles. The producers of textiles and footwear products, including unsold consumer products considered waste that were supplied on the territory of the Member States after the entry into collected used and waste textile, textile-related and footwear products, including unsold consumer products considered waste that were supplied on the territory of the Member States after the entry into orice of this amending Directive to ensure that the extended producer responsibility obligations do not apply retractively and comply with the principle of legal certainty. Those in ordinaries after the entry into state of carrying out to product and the contractively and comply the principle of legal certainty. Those in ordinaries are contractively and comply the producer in our common of the contractive of the contractively and comply the principle of legal certainty. Those in ordinaries are contractively and comply the principle of the producer should also finance the costs of carrying out to previous department of the contractively and comply the contractively and contr

WFD, Art 22a, #4 and #6: (4) "Member States shall ensure that the producers of textile, textile-related or footwear products listed in Annex I/c cover the costs of the following..."
(6): "The costs to be covered referred to in paragraph 4 shall not exceed the costs that are necessary to provide the services referred to in that paragraph in a cost-efficient way and shall be established a transparent way helween the artors concerned."

WFD, page 23: "it is essential that the producers making available on the market for the first time certain textile, textile-related and footwear products take responsibility for their management at their end-of life as well as <u>extending their lifetime</u> through making used textile, textile-related and footwear products assessed a fit for ne-use available on the market for re-use

WFL) page 26: The introduction of extended producer responsibility schemes should maintain and support the activities of social economy entities involved in used textities management. These introduction of extended producer responsibility schemes should maintain and support the producer creating validity jobs for all and in particular for vulnerable group:

How to make sure Extended Producer Responsibility becomes a silver bullet

C Lisbeth Løvbak Berg on 24. October 202



This is a letter sent to commissioners and members of the European Commission in October 2022, from 4 participants in the Wasted Textiles project that explains their suggestions for a way of developing an EPR scheme that addresses volumes. They suggest an Eco-modulation based on volumes in the waste and therefore include the growing online trade.

