

ANNEX I

Background Dossier for CHAPTER 27 - Environment and Climate Change – Waste Sub-Chapter

1. Request for Transitional Period for Implementation of Provisions of Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives

1. Introduction

Moldova requests a 15-year transitional period from the date of EU accession for the application of Article 22 on Bio-waste, and a transitional period of 5 years for Article 11 (2a, 2b) of Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives. Moldova requests a 15-year transitional period for Article 11 (2,c,d,e) for gradually attaining the EU targets of 2025, 2030, 2035. Also, following the latest amendments of the Directive introduced by Directive (EU) 2025/1892 of 10 September 2025, Moldova requests 7 years after accession to the EU for the implementation of Article 9a and 5-year transition for application of Article 22a and 22d.

The transitional period is requested for **Art. 11 - Preparing for re-use and recycling, Art. 22 - Bio-Waste** of the Directive 2008/98/EC, and for the latest revised provisions of the Directive: **Article 9a - Prevention of food waste generation; Article 22a - Extended Producer Responsibility Scheme for Textiles and Article 22d - Management of waste textiles.**

The transitional period is requested for the following provisions:

a) Article 11 (2a): mandates that by 2020, the preparing for re-use and the recycling of waste materials such as at least paper, metal, plastic and glass from households and possibly from other origins as far as these waste streams are similar to waste from households, shall be increased to a minimum of overall 50 % by weight; Moldova requests a transitional period of **5 years from the date of accession** as following:

- by 31 December 2035 : preparing for re-use and recycling of waste materials such as at least paper, metal, plastic and glass from households and possibly from other origins is increased to 50 percent by weight.

Currently, the Law No. 209/2016 on waste provides for 30 percent for re-use and the recycling of waste materials such as at least paper, metal, plastic and glass from households to be achieved by 2030.

b) Article 11 (2b): mandates that by 2020, the preparing for re-use, recycling and other material recovery, including backfilling operations using waste to substitute other materials, of non-hazardous construction and demolition waste excluding naturally occurring material defined in category 17 05 04 in the list of waste shall be increased to a minimum of 70 % by weight; Moldova requests a transitional period of **5 years from the date of accession** as following:

- by 31 December 2035: the preparation for re-use, recycling and other material recovery, including backfilling operations using waste to substitute other materials, of non-hazardous construction and demolition waste excluding naturally occurring material defined in category 17 05 04 in the list of waste is increased to 70 percent by weight.

c) Article 11 (2,c,d,e) provides for the following targets:
(c) by 2025, the preparing for re-use and the recycling of municipal waste shall be increased to a minimum of 55 % by weight;
(d) by 2030, the preparing for re-use and the recycling of municipal waste shall be increased to a minimum of 60 % by weight;
(e) by 2035, the preparing for re-use and the recycling of municipal waste shall be increased to a minimum of 65 % by weight.

As provided in Article 11, para 3, whereby a Member State may postpone the deadlines for attaining the targets referred to in points (c), (d) and (e) of paragraph 2 by up to five years provided that Member State: (a) prepared for re-use and recycled less than 20 % or landfilled more than 60 % of its municipal waste generated in 2013 as reported under the Joint Questionnaire of the OECD and Eurostat. Moldova meets these conditions, however, Moldova is requesting 15 years transition to achieve the EU recycling and re-use targets, as follows:

- by 31 December 2040 preparing for re-use and recycling of municipal waste shall be increased to a minimum of 55 percent by weight.
- by 31 December 2045 preparing for re-use and recycling of municipal waste shall be increased to a minimum of 60 percent by weight.
- by 31 December 2050 by preparing for re-use and the recycling of municipal waste shall be increased to a minimum of 65 percent by weight.

d) Article 22 - Bio - waste. The directive mandates that by 31 December 2023, Member States shall ensure that bio-waste is either separated and recycled at source, or is collected separately and is not mixed with other types of waste. Moldova requests a transitional period of **15 years from the date of accession** to ensure compliance with this provision.

Achieving these targets requires substantial investment in adequate collection, re-use, and treatment infrastructure, which is currently limited. Only three operators are authorised for recycling (plastic, glass, and cardboard), while most waste is landfilled. Certain streams, such as WEEE, batteries, and end-of-life vehicles, must be exported due to the absence of domestic treatment capacities. There is currently no nationwide infrastructure for separate collection of bio-waste and textiles.

The establishment of an integrated waste management system is planned by 2032-2033 with the support of European Bank for Reconstruction and Development (EBRD) / European Investment Bank (EIB) investment projects within the Solid Waste Programme.

After developing the integrated waste collection systems, with treatment facilities for recycling and composting, ensuring compliant landfills and systems for hazardous waste management, additional time will be needed to achieve a sound separate collection system to meet the targets - from 30% to 55% in 2040 and to 65% in 2050.

For further alignment with the Directive, alongside infrastructure development which is either insufficient or not established at national level, the efforts to strengthen data collection, enforcement, and local administrative capacity will be undertaken.

e) Article 9a - Prevention of food waste generation. Article 9a of the revised Waste Framework Directive, establishes binding targets for the reduction of food waste across the food supply chain, including a 10% reduction in processing and manufacturing by 2030 and a 30% per capita reduction in retail, food services, and households relative to 2020 levels. Moldova requests a transitional period of **7 years from the date of accession** to ensure compliance. A transitional period will allow Moldova to create national food waste measurement systems, gradual rollout of food donation networks and surplus redistribution systems, including fiscal incentives, and development of HoReCa sector compliance mechanisms.

As a lower-middle-income economy, Moldova's gross domestic product per capita stood at 7,617.5 United States dollars in 2024, according to World Bank estimates, approximating 7,000 euros based on prevailing exchange rates. The agricultural sector remains a cornerstone of the national economy, contributing approximately 7.6% to gross domestic product in recent years, with a notable recovery in 2023 where it expanded by 31.9% following prior disruptions. This sector also accounts for around 26% of employment, rendering it highly vulnerable to external shocks such as droughts, geopolitical tensions, and energy crises, as evidenced by the 2021-2022 period where crop yields suffered substantial declines. Article 9a's requirements for mitigating waste in primary production and processing could exacerbate these vulnerabilities, given the prevailing infrastructural deficiencies, including limited access to refrigerated storage and efficient logistics networks. Estimates from the Food and Agriculture Organisation indicate food losses in the agricultural domain ranging from 20-30%, particularly for perishable commodities, underscoring the need for gradual investments rather than abrupt enforcement. Hastened compliance may

elevate costs for producers and small enterprises, potentially leading to business failures, reduced output, and threats to food availability, thereby undermining the Union's food security priorities.

Official statistics from the National Bureau of Statistics reveal that municipal waste generation in 2021 totaled approximately 1,055.9 thousand tonnes, though per capita figures suggest around 252 kilograms annually, implying a national aggregate closer to 650-700 thousand tonnes when adjusted for population estimates. Biodegradable components, including food waste, comprise an estimated 30-56% of this volume, equating to roughly 316 thousand tonnes at the lower bound. Within this, food waste attributable to the retail sector represents about 5-7%, potentially yielding 15 thousand tonnes annually. Combustible waste fractions, such as textiles, packaging, and furniture, constitute 15-20% of municipal waste, often subjected to unregulated open burning, which contributes to greenhouse gas emissions and environmental harm. In the capital municipality of Chisinau alone, annual municipal waste generation approaches 600 thousand tonnes, with combustible elements estimated at 100 thousand tonnes; these figures are projected to rise with improved collection systems. Absent a transitional framework, enforcement risks inaccurate data reporting, punitive measures, and forgone opportunities for capacity building, favoring short-term compliance over sustainable systemic reforms.

A phased approach, permitting incremental infrastructure development and targeted investments, would mitigate these perils while advancing alignment with European standards. This could encompass support for modernizing agricultural supply chains, enhancing waste segregation mechanisms, and fostering public-private partnerships to bolster recycling and composting initiatives, as outlined in Moldova's national waste management strategies. Such accommodations would safeguard economic stability and food security, ensuring that the Republic of Moldova's integration into the European framework proceeds equitably and effectively.

f) Article 22a - Extended producer responsibility scheme for textiles

Article 22a stipulates the segregated collection of textile waste, inclusive of engagement with social economy entities. Within the Republic of Moldova, merely 0.3% of post-consumer textile waste undergoes separate collection, as indicated by 2023 data from the Environment Agency: from an annual generation of 30,391 tonnes (equating to 12.5-13 kilograms per capita), only 98.69 tonnes were collected separately. The residual portion is commingled with municipal waste, subjected to open-air incineration, or disposed of in an unregulated manner, thereby intensifying greenhouse gas emissions and environmental contamination. Approximately 15-20% of municipal waste, inclusive of textiles, comprises combustible fractions that are unlawfully incinerated, inflicting ecological harm. Within Chisinau alone, from an annual municipal waste volume of 600,000 tonnes, 100,000 tonnes are combustible, with projections of augmentation upon the introduction of separate collection. Abrupt enforcement of the extended producer responsibility scheme would overburden an inherently vulnerable system, deficient in suitable collection points culminating in logistical challenges and unrecovered expenditures. A transitional period would permit investments in infrastructural enhancements (such as collection points and sorting

facilities), stakeholder training (encompassing private and public operators, as well as local authorities pursuant to paragraphs 7(c)-(d)), and the piloting of schemes.

Substantial import volumes and textile waste generation surpassing existing management capacities. The Republic of Moldova engages in extensive importation of second-hand apparel: 19,319 tonnes (exceeding 58 million units) over the period 2020-2024, sanctioned via Government Decision No. 427/2001. Such imports subsequently constitute post-consumer waste, and Article 22a obliges producers—including importers from third countries—to designate authorized representatives and defray costs associated with collection and treatment. The domestic textile industry produced 1,400 tonnes of waste in 2023, with exports of waste derived from synthetic or artificial fibers (NC code 5505) being noteworthy, whereas imports of waste from flax or hemp remain negligible. Absent a transitional mechanism, producers—whether domestic or foreign—would be compelled to forthwith assume expenditures for inquiries into waste composition (paragraph 8(b)), informational campaigns (paragraph 8(c)), and research and development pertaining to sustainable design (paragraph 8(e)). This exigency would elevate textile pricing, impinging upon affordability for the populace (wherein second-hand clothing is indispensable) and potentially fostering illicit imports or amplified unregulated incineration. The transitional phase would also afford temporal latitude for the establishment of a producer registry (Article 22b), the incorporation of online platform providers, and logistical services, thereby securing compliance devoid of significant economic perturbations.

Deficiency in institutional stakeholders and administrative capabilities necessitating developmental time. The extended producer responsibility scheme delineates explicit roles for producers, extended producer responsibility organizations, waste operators, local authorities, and social entities. In the Republic of Moldova, mature extended producer responsibility organizations for textiles are presently nonexistent, and participation by social economy entities remains constrained. The state is obligated to delineate responsibilities and ensure engagement, extending to waste from commingled municipal streams (paragraph 9). Empirical data evinces suboptimal management of textile waste, with imports and exports omitted from pertinent legal annexes (e.g., Annex 7 to Law No. 209/2016). Expedited implementation would mandate instantaneous legislative amendments, designations of representatives, and oversight of online platforms and logistics, thereby overburdening institutional frameworks (including the Environment Agency and local authorities). A transitional period would enable harmonization of national legislation (e.g., revisions to Law No. 209/2016), stakeholder capacity-building, and the trial of voluntary schemes, thereby mitigating hazards of non-conformity and juridical disputes.

Economic and environmental ramifications: precipitous implementation could exacerbate current challenges and delay long-term convergence. Costs associated with extended producer responsibility (paragraph 12) must exhibit efficiency; Producers would be liable for waste introduced to the market commencing 2025 (paragraphs 10-11), inclusive of those arising from private resale imports. In the absence of transition, greenhouse gas emissions and pollution would intensify, in contravention of European Union objectives. Moldova requests a transitional period of **5 years from the date of accession** to ensure compliance. The transitional framework would

bolster investigative endeavors (paragraph 8(e)) aimed at fiber-to-fiber recycling, thereby assimilating the Republic of Moldova into the European Union's circular economy paradigm, absent economic dislocations (e.g., impacts upon the textile sector, which engages in waste exports).

g) Article 22d - Management of waste textiles

Paragraphs 4–10 of Article 22d impose obligations on Member States to ensure that separately collected used and waste textile, textile-related and footwear products are subject to sorting operations consistent with the waste hierarchy and that all subsequent re-use, preparing-for-re-use, remanufacturing, and recycling stages comply with strict quality, record-keeping, and traceability criteria. These provisions also require Item-level sorting to distinguish between fractions fit for direct re-use and those destined for further processing (paragraph 5); Compositional surveys of mixed municipal waste every five years to assess the textile fraction and adjust collection systems accordingly (paragraph 6); Verification and inspection mechanisms to differentiate legitimate re-use shipments from waste exports (paragraphs 7–9); and Record-keeping and documentation obligations for professional shipments of used textiles (paragraphs 8–10), including invoices, prior-sorting evidence, and declarations of non-waste status.

Only a small number of private operators and social-economy initiatives are engaged in manual sorting of second-hand clothing, mainly for resale or donation, without certified traceability or conformity with EU waste-hierarchy principles. Consequently, most used textiles collected domestically or imported as second-hand clothing are handled without standardized documentation or recovery tracking. Moldova requests a transitional period of **5 years from the date of accession** to ensure compliance. The transitional period would enable Moldova to establish and equip national and regional sorting facilities capable of item-level segregation and verification of re-use suitability; develop methodological guidelines and IT modules for textile-waste traceability within the national Waste Information System (SIA MD); and create technical standards for classification, packaging, and labelling of sorted fractions. A transitional period is also necessary to elaborate procedures for inspection, reporting, and enforcement, to train personnel within the Environmental Agency, Customs, the Environmental Protection Inspectorate and to implement digital tools enabling real-time monitoring.

1.2. Scope

In the case of Moldova, the provisions of the Directive for which a transitional period is requested apply to the following installations, activities and sectors below:

Installations and Activities:

- Regional waste operators: 6 regional operators - one per each Waste Management Zone (WMZ) (1,2,5,7,8), and 2 regional waste operators in WMZ 4;

- Municipal waste collection operators (around 49 at municipal and community level; following the development of integrated waste management infrastructure by 2032 - 6 regional sanitary landfills);
- Authorised waste managers (collection, sorting or other forms of preparation for recovery, in case of glass cullet - recycling) for paper, metal, plastic, glass, and other recyclables as follows:
 - Paper and cardboard - 12 economic operators;
 - Wood packaging - 8 installations;
 - Plastic packaging - 20;
 - Glass packaging - 9;
 - Metal packaging - 5;
 - Waste tyres - 5;
 - Batteries and accumulators - 16;
 - Waste from Electrical and Electronic Equipment (WEEE) - 3;
 - Metal scrap - 58.
- Authorised waste managers for other waste flows:
 - Clinical waste - 3;
 - Biodegradable waste - 1.
- Facilities for re-use preparing, such as, repair, refurbishment centres (data on the number of facilities need to be established);
- Construction and demolition (C&D) waste generators and treatment facilities (data on the number of facilities need to be established).

Activities:

- Backfilling operations where non-hazardous C&D waste substitutes other materials, particularly in road construction and other infrastructure projects;
- Extended Producer Responsibility systems and producers;
- Transboundary shipments of waste, export for treatment/recycling in line with Waste Shipment Regulation (WSR);
- Data collection and reporting systems.

Sectors Targeted:

- Waste generators: households – as the primary source of municipal waste; commercial and institutional sectors generating waste streams similar to household waste (e.g., offices, schools, retail);
- Construction and Demolition sector – responsible for C&D waste streams;
- Waste management sector: municipal services, authorised waste management economic operators, waste collection services, producer responsibility organisations, recyclers, recovery facilities;

- Commercial sector: producers/importers of EPR products, retail and distribution sector (supermarkets, shops, wholesalers, HORECA suppliers);
- Public authorities - municipalities, local public authorities, Environment Agency and Environmental Protection Inspection – responsible for ensuring collection infrastructure, authorisations, and monitoring compliance.

2. Current State of Play

2.1. Legal Framework

National Legislation:

Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives, was partially transposed in Law No. 209/2016 on waste, (in force since 23 December 2017) and more than 15 bylaws adopted during 2018 and 2025. The Law No. 209/2016 transposes core Waste Framework Directive provisions: definitions (Art. 3 Waste Framework Directive in Art. 2), hierarchy (Art. 4 in Art. 3), classification (Art. 7/Annex III in Government Decision No. 99/2018, aligned with EU Catalogue). EPR (Art. 8 and 8a) is partially covered in Art. 12/12¹, with bylaws for six streams (Government Decision No. 212/2018 on Waste Electrical and Electronic Equipment, Government Decision No. 561/2020 on Packaging and packaging waste, Government Decision No. 586/2020 on Batteries and accumulators/waste batteries and accumulators, Government Decision No. 610/2022 on used tyres, Government Decision No. 731/2022 on used oils, Government Decision No. 93/2023 on End-of-life vehicles). Targets (Art. 11) are set in Art. 14 (30 percent household recycling by 2030), and plans (Arts. 28-30) in Government Decision No. 972/2023 on the National Programme on Waste Management for 2023-2027) and Government Decision No. 248/2013 on Waste Management Strategy for 2013-2027. International obligations under Basel and Stockholm Conventions are met including by submitting annual reports. Further transposition of Directive 2008/98/EC is planned by the end of 2026 by amending Law No. 209/2016 on waste.

The **Law No. 209/2016 on waste**, provides for the following state policy objectives:

- a) by 2025 – introduction of separate collection systems for paper, glass, metals and plastics;
- b) by 2030 – preparing for re-use and recycling of waste, such as at least paper, glass, metals and plastics from household products and possibly from other sources, in so far as these waste streams are similar to waste from household consumption, shall be increased to a minimum of 30 percent of the total mass;
- c) by 2030 – preparing for re-use and other material recovery operations, including backfilling operations, using waste to replace other substances, non-hazardous construction and demolition waste, excluding natural geological materials, shall be increased to a minimum of 55 percent of the total mass.

According to the National Programme for Waste Management, approved by Government Decision No. 972/2023 , the objective is to reduce the amount of waste generated, increasing by up to 40-60 percent the recovery and recycling rate of products subject to EPR and increasing the level of awareness regarding the importance of waste management by 2027:

Specific Objective 2.1. - Prevention of waste generation - 30 percent reduction in the amount of waste disposed of at landfills;

Specific Objective 2.2. - Reducing the amount of recyclable municipal waste disposed of at landfills - Reduction of recyclable fractions from municipal waste disposed of through recycling as follows:

- plastics – at least 35%;
- paper – at least 25%;
- glass – at least 50%.

The Code No. 434/2023 on Urban planning and construction contains general provisions on management of C&D waste in Art. 319-321.

Law No. 178/2025 on the public sanitation service establishes the unitary legal and institutional framework regarding the establishment, organisation, management, financing, monitoring and control of the operation of the public sanitation service of localities, including the administration and operation of the infrastructure related to this service. The new law regulates the responsibilities of local public administrations (LPAs) in the field of managing sanitation services.

Full transposition is planned by the end of 2026 by amending Law No. 209/2016 on waste.

2.2. Institutional Setup

The **Ministry of Environment** is responsible for developing policy documents and draft legislation in the field of waste management and contaminated sites, coordination of implementation of waste management activities at the national level, and monitoring the status of Waste Management Programme implementation.

Environmental Agency is responsible for data collection, technical analysis, and preparation of annual reports related to waste management and implementation of Directive 2008/98/EC. It also contributes to national reporting obligations under EU and international environmental frameworks.

Environmental Protection Inspectorate is responsible for monitoring compliance of waste management installations and facilities by conducting regular inspections, enforcement activities, and applying sanctions or corrective measures, in case of non-compliance with environmental legislation.

Local Public Authorities are responsible for planning and organising public waste collection service in the locality according to Law No. 209/2016 on waste, in particular implementation of

waste hierarchy, establishment of separate collection, transport, recovery, and final disposal of waste, allocate designated sites for separate collection of different municipal waste streams and for a complementary collection system for EPR products, as well as development of local waste management programmes and regional cooperation. They are also responsible for calculation of the amount of the municipal waste management fee from waste holders and its collection.

Inter-municipal associations are responsible for organising the activity of the integrated municipal waste management system, in particular supervision and control of contractual obligations between the administrator of the integrated municipal waste management system and the operator of the municipal waste management service, and performing as well other functions entrusted by local public administration authorities regarding the organisation of the integrated municipal waste management system.

Regional Operators are responsible for the activities as follows:

- Operation of integrated waste management service in each WMZ including separate collection, transfer, sorting/Mechanical-Biological Treatment (MBT)/composting/landfill operations;
- Calculate, propose, and collect tariffs for integrated waste management service across the WMZ;
- Operate Integrated Waste Management infrastructure including, transfer stations, sorting and composting stations, bio-waste facilities and landfills; hold permits and ensure monitoring and closure/after-care where applicable;
- Consolidate regional data and report annually via automated information system Waste Management SIA MD to the central Environmental Agency, and support local plan monitoring;
- Ensure operations meet environmental protection requirements and any selective-collection obligations set in national waste legislation;
- Support awareness campaigns and user information duties defined in local and national waste management programmes.

2.3 Implementation Status

The implementation of the Waste Framework Directive 2008/98/EC takes into account other waste management requirements, in particular the targets set by the Landfill Directive (1999/31/EC), Regulation (EU) 2025/40 on Packaging and Packaging Waste repealing Directive 94/62/EC, and Single-Use Plastics Directive (Directive (EU) 2019/904). These Directives guide the way municipal waste is collected and treated, and the amounts of waste to be diverted for other types of treatment and/or to be disposed of at landfills.

Moldova relies on a regional waste management approach, by dividing the country into 6 waste management zones. The development of the integrated waste management system and appropriate infrastructure is currently ongoing based on the “Solid Waste in Moldova” Project (2023-2032),

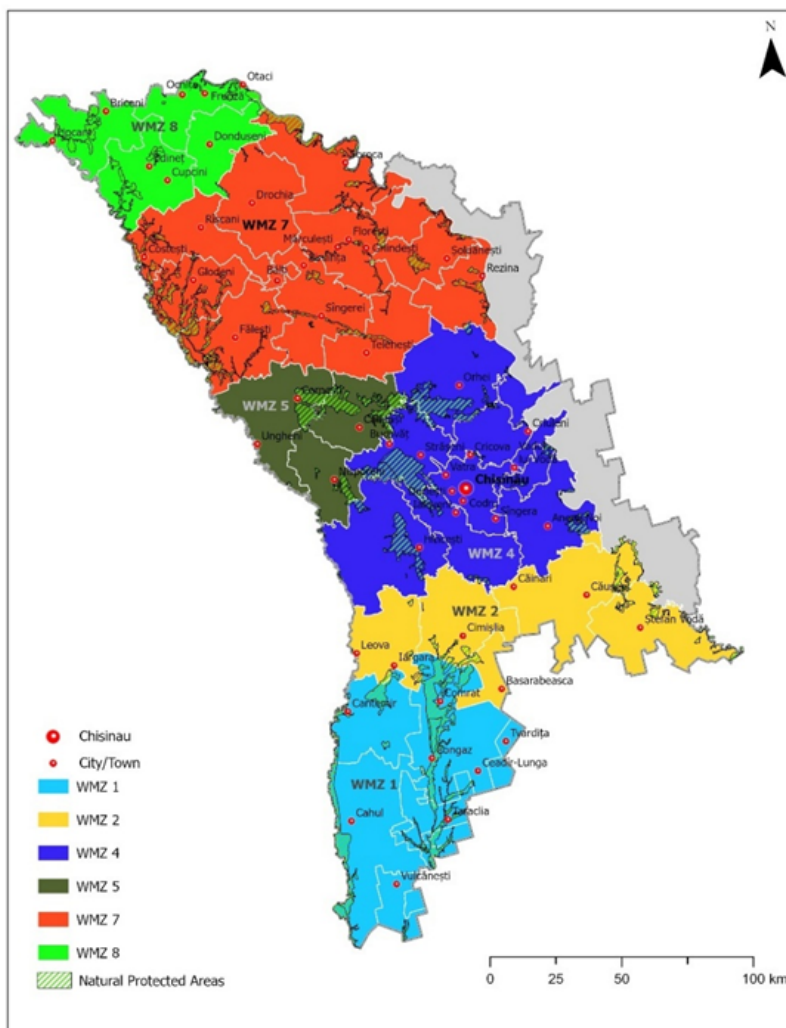
funded by the European Investment Bank and the European Bank for Reconstruction and Development, as well as by a grant provided by Eastern Europe Energy Efficiency and Environment Partnership (E5P).

Its total estimated value is over EUR 200-250 million, and the project is scheduled for completion by the end of 2032. The local public authorities will allocate the land for the construction of transfer stations and integrated waste management centres.

Implementation of integrated waste management systems is planned as follows:

- WMZ 5 - end of 2028
- WMZ 8 - end of 2028
- WMZ 1 - end of 2029
- WMZ 4 and 7 - end of 2030
- WMZ 2 - end of 2032

Figure 1. Waste management zones division in the Republic of Moldova



Source: National Programme on Waste Management for the years 2023-2027 (Government Decision No. 972/2023)

Moldova's request for the transitional period takes into consideration the currently existing waste management infrastructure which is insufficiently developed for preparing for re-use and the recycling of municipal waste and for separate collection or recycling at source of bio-waste as per Directive's requirements.

- There are 3 authorised landfills and about 500 unmanaged landfills, around 600 illegal dumpsites where population is discarding waste, 1 transfer station in Chisinau, 2 sorting stations (in Chisinau and Falesti), 2 composting stations in Chisinau. Only one sanitary landfill is under operation in the municipality of Chisinau, while there are several smaller landfills (up to 6) under operation at district level that partially comply with the sanitary landfill requirements;
- About 400 economic entities have permit for waste management, of which over 150 are collecting ferrous and non-ferrous metals, while the other are authorised for collection of other recyclables, as follows: 9 authorised plastic treatment installations, 2 authorised glass recycling installations, 2 authorised waste paper recycling installations and about 10 paper waste collection installations;
- There is one authorised installation for co-incineration of non-hazardous waste (such as tyres, packaging and some types of plastic) and for utilisation of by-products from other industrial sectors, including wastes from slag processing, unprocessed slag, and glass-based fibrous materials – operated by SA Lafarge Moldova;
- There is one authorised installation for recycling metal scrap – Ribnita Metallurgical Plant – which processes ferrous and non-ferrous metal waste into secondary raw materials for use in the steel industry;
- There is one authorised installation for dismantling end-of-life vehicles – Metalferos SA – operating as the country's largest company for metal scrap collection and preparation for recycling;
- 8 EPR collective systems and 35 individual systems for packaging and packaging waste (about 6400 producers/importers);
- 8 EPR collective systems and 3 individual system for WEEE (about 2703 producers/importers);
- 6 EPR collective systems and 12 individual systems for batteries and accumulators waste (about 480 producers/importers);
- 6 EPR collective systems and 8 individual systems for end-of-life vehicles (about 582 producers/importers);

- 4 EPR collective systems and 34 individual systems for waste tyres (about 180 producers/importers);
- 4 EPR collective systems and 11 individual systems for waste oils (about 154 producers/importers/importers);
- The establishment of a Deposit Return System has been initiated, by adopting Government Decision No. 379/2025 on establishment of the Deposit Return System (DRS). The producers are in process of developing the application dossier to be designated as Administrator. The DRS system is expected to become operational by 31 January 2027.

Table 2. Waste Recovery and Recycling Indicators in Moldova (2020–2024)

Recovery rate per type of material	2020	2021	2022	2023	2024
paper and cardboard recovery rate, including exported for recovery, %	22.18	28.51	27.13	33.58	36.10
paper and cardboard recovery rate in Moldova, %	3.23	3.21	3.39	4.88	3.26
plastic recovery rate, including exported waste%	3.72	4.15	5.13	5.75	8.83
plastic recovery rate in Moldova, %	3.06	3.88	4.90	5.18	8.76
glass recovery rate from cullet collected in Moldova, %	0.34	62.38	11.54	20.74	1.80
% imported from total recycled	230.53	155.64	75.01	80.25	95.75

Source: Environment Agency

Moldova faces several challenges in achieving the Directive’s requirements before accession and the EU targets provided for within the Directive’s deadlines.

- The collection coverage for Municipal Solid Waste (MSW) currently covers around 85 percent of urban population and less than 30 percent in rural areas or above 55 percent of total population.
- Separate collection of waste exists in some districts of Chisinau municipality and in a few other towns and communities, where municipal waste is collected in separate containers intended for collection of different types of waste (glass, paper, plastic/PET and cans).
- Separate collection of recyclables other than packaging waste from households is not yet implemented adequately. Several public utility companies that collect waste, reported separate collection of recyclables in the SIAMD only during 2022-2024. However, the officially reported amounts of separately collected waste are uncertain due to limited technical capacity of the waste operators.

- Separate collection infrastructure is at an early stage of development in both urban and rural areas. The implementation timelines planned for the development of waste management infrastructure in each zone as well as the final expected completion date of the entire project at the national level is presented below in the Roadmap for implementation.
- Recycling targets for municipal waste set up in the Law No. 209/2016 on waste, have not yet been achieved. Currently, the recycling and preparation rate for recyclables are rather modest. Based on reported waste data in SIAMD (<https://siamd.gov.md/>), the recovery rate evolved from about 10 percent in 2020 to about 18 percent in 2024, including recyclables exported to neighbouring countries (Romania and Ukraine).
- Even though municipal waste contains a high degree of organic components up to 50 percent, there are no facilities yet for biological treatment of municipal waste.
- There are no facilities for incineration of municipal waste in Moldova.
- The secondary material market is at a very early stage, and national recycling capacities are very low, thus, most of the separate collected waste goes for recycling abroad (see Table 2 above). The market for repair, re-use is based on small and medium-sized enterprises (SMEs), which need significant investments to enhance capacities and acquire additional skills to address the needs.
- Moldova currently lacks nationwide infrastructure for separate collection of bio-waste and textiles. Substantial investment in municipal waste management systems, sorting plants, and composting/anaerobic digestion facilities is required.
- Recycling targets for construction and demolition waste set up in the Law No. 209/2016 on waste, have not yet been achieved. At the moment, no recycling scheme for Construction and Demolition waste is in place, while the bulk of construction and demolition waste is landfilled or dumped at unsecured local dump-sites. Figures on recycled amounts are not available.
- Textile: while there is no official data on textile waste from households, estimates suggest that approximately 3 percent of 600 tons of household waste collected daily in Chisinau consists of textiles. The requirement for separate textile collection has not yet been transposed in Law No. 209/2016 on waste.
- There is limited access to public waste management services, as not all local public administration authorities ensure service coverage for residents in their jurisdictions.
- Insufficient institutional capacity among local public authorities to establish tariffs or fees for cost recovery in waste collection services.
- The recycling and recovery markets are underdeveloped.

2.4. State of play

Extended Producer Responsibility

The EPR implementation is still in its early stages, with a relatively complete regulatory framework, while enforcement mechanisms still require significant strengthening to ensure effectiveness. Art. 12 and 12(1) of the Law No. 209/2016 on waste set up requirements on extended producer responsibility implementation on several products, such as: waste electric and electronic equipment, packaging waste, waste oils, waste batteries and accumulators, tyres and end-of-life vehicles, and are partially aligned with Art. 8 and 8a of the Waste Framework Directive (WFD). The dedicated regulations for each waste flow are developed, but the targets set are, at the moment, far from meeting EU standards. Thus, further efforts will be undertaken to establish an adequate monitoring and enforcement framework so that producers of products and organisations implement extended producer responsibility obligations (Art. 8a (5) of the WFD).

The challenges related to EPR implementation are:

- Insufficient capacity at the Environmental Agency to oversee the implementation of Extended Producer Responsibility (EPR) schemes;
- Insufficient cooperation between municipalities and EPR schemes, which hampers the establishment of efficient collection points for waste.
- Municipal waste collection infrastructure is underdeveloped.
- Treatment and pre-treatment for waste are limited and require significant investment to enhance recycling efficiency.

Hazardous waste

Moldova currently lacks sufficient and adequate infrastructure for treatment and environmentally sound management of hazardous waste. There are no precise data to indicate the quantity of hazardous waste generated annually. Also, an adequate network of treatment installations or a centralised storage site for hazardous waste is not in place, and incineration capacity for organic industrial and medical waste is lacking. To address these gaps, Moldova intends to establish a national hazardous waste management centre, based on a feasibility study planned to be carried out by the end of 2026.

The European Bank for Reconstruction and Development launched a scoping study to provide information on the main hazardous waste (HW) generators, high-level estimates on HW types and generation, and to evaluate the proposed setup in terms of locations for the HW management system. In addition, the study intends to provide information of potential technical solutions, a high-level CAPEX-estimate and the needed institutional setup for a successful implementation and operation of a future HW management system.

Food waste

The Law No. 299/2022 on prevention of food loss and waste entered into force on 25 May 2023. It aims to ensure the transition to a circular economy by keeping food in the consumption chain and avoiding waste, as well as by reducing expenses related to food loss and waste, and by encouraging the redistribution of surplus food. Based on this legal framework, the online platform *Donezalimente.md* was developed with EU funding in 2023. This platform connects food donors- e.g., retailers and producers- with social service providers. Donors list available food, and beneficiaries can access it directly - without accessing it through the Food Bank warehouse. Since its launch, around 90 tonnes of food have been redistributed to 39 social services, benefitting more than 5,000 individuals.

Historical Waste

a.) Mercury

The inventory of mercury (Hg) stocks, including the confiscated mercury, which was carried out in 2021 confirmed the existence of approximately 500 kg of stored mercury (of which 150 kg represents the confiscated mercury, kept by law enforcement agencies). A significant amount of mercury-containing product waste is also attested in health and educational institutions (thermometers and Hg containing lamps).

b.) Polychlorinated Biphenyls (PCB) waste

Within the framework of the pilot project “Global clean-up in view of meeting the 2025 and 2028 goals regarding PCB under the Stockholm Convention”, the inventory of PCB containing equipment was conducted in 2023-2024. The results are presented in Table 3. below:

Table 3. Inventory of PCB-Containing Equipment

	Mass of total equipment, tons	Mass of oil, tons	
subtotal	211.44	54.53	PCB > 50ppm
	1298.90	270.50	PCB < 50ppm
Total under inventory	1510.33	325.02	

Source: Project “Global clean-up in view of meeting the 2025 and 2028 goals regarding PCB under the Stockholm Convention” in the Republic of Moldova

Reporting system

Data on waste management is reported to the Environment Agency via reporting platform www.siamd.gov.md - Waste Management Information System, based on European waste classification. The online system is also a platform for reporting of waste management data,

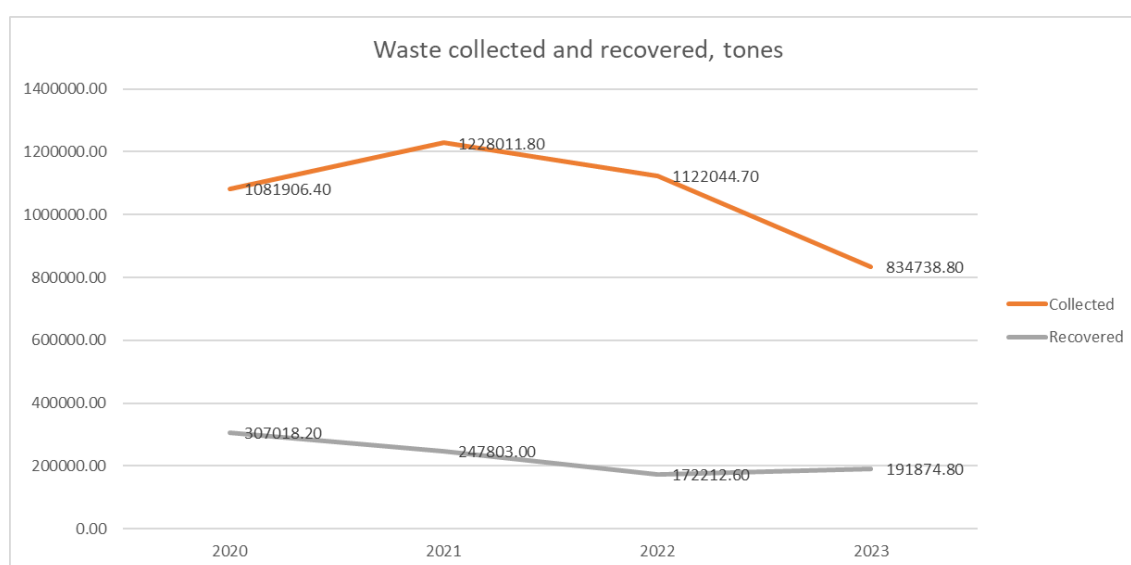
including registration of EPR producers and application for the permit issue for waste treatment facilities.

The system has been operational since 2018, and is well developed and user-friendly.

However, the challenges related to waste reporting are:

- Incomplete coverage of reporting obligations, as not all entities required to submit reports comply with this obligation;
- Difficulties in ensuring the correct classification of waste and the accurate assignment of waste management operations;

Figure 2. Waste collected and recovered (2020 - 2023)



Source: Environment Agency

Table 4. List of challenges of involved entities

Entity	Description / Roles	Challenges
Local Public Authorities	Plan and organise the public waste collection service in the locality in accordance with the Law No. 209/2016 on waste, in particular regarding implementation of waste hierarchy, establishment of separate collection, transport, recovery, and final disposal of waste, allocation of designated sites for separate collection of different municipal waste streams and for a complementary collection system for	- Limited coverage with waste collection services, especially in rural areas - Poor separate collection infrastructure for recyclables, bio-waste, and textiles. - Limited capacity to implement waste management programmes. - Poor cooperation with EPR schemes - Weak systems for the gate fees on landfills, no differentiated gate fees for

	EPR products. Develop local waste management programmes and for regional cooperation.	disposal of recyclable and non-recyclable wastes.
Waste collection operators	Provide waste collection, transport, and disposal services. They must be authorised in accordance with Law No. 209/2016 on Waste.	- Insufficient technical capacity for separate collection (containers, vehicles). - Continued disposal of mixed waste in non-compliant landfills - Non-compliance with landfill closure/rehabilitation obligations - Weak systems for the gate fees on landfills, no differentiated gate fees for disposal of recyclable and non-recyclable wastes.
Waste Management Operators	Approximately 400 authorised operators are active in collection, recycling, and recovery of various waste streams (paper, glass, plastic, metals, packaging, etc.).	- Low recycling performance. - Limited treatment capacity and insufficient financial resources (especially with regards to. bio-waste, textiles, hazardous waste). - Reliance on export of recyclables due to weak domestic secondary materials market. - Gaps in compliance with technical standards. - Limited selective collection and pre-treatment of C&D waste. - Predominant landfilling or dumping of C&D waste. - Absence of recycling infrastructure for C&D waste. - Limited hazardous waste treatment and storage capacity.
Extended Producer Responsibility (EPR) Schemes and Producers	Collective and individual compliance schemes, producers and importers subject to EPR obligations (packaging, WEEE, batteries, end-of-life vehicles, oils, tyres, textiles), which have to establish and co-finance collection and treatment in cooperation with the municipalities (for packaging, WEEE, batteries).	- Still incomplete coverage of obligated producers - Insufficient financing and investments in collection infrastructure by EPR schemes - Poor cooperation with municipalities in establishing collection points - Targets not yet achieved for packaging, WEEE, and other streams, and still the targets are far below the EU targets.

Industrial and Construction Sectors	Economic operators generating construction and demolition waste and hazardous waste, who will be obliged to ensure selective collection, pre-treatment, and delivery to appropriate facilities.	- Absence of recycling infrastructure for C&D waste. - Limited compliance with the legal requirements and technical norms applicable to the demolition of buildings, including environmental protection, occupational safety, and waste management obligations.
Waste generators – citizens/ households and economic entities	Generators of municipal waste are obliged to participate in separate collection and bear, through tariffs or fees, a share of the costs for improved waste services.	- Limited awareness for separate collection, waste prevention and recycling. - Resistance to tariff increases for waste services. - Illegal dumping or disposal at non-compliant sites.

3. Justification for the transitional period

Moldova’s post-Soviet legacy—characterised by centralised, underfunded waste services and a systemic reliance on landfilling—has resulted in persistent infrastructural, enforcement and data-management gaps that cannot be bridged rapidly without risking environmental harm, financial instability, and non-compliance. Immediate implementation of the Directive’s full obligations would undermine both the effectiveness and the sustainability of reforms.

At present, the waste-management infrastructure is significantly underdeveloped and, in several regions, entirely absent. Key components required for compliance—integrated separate-collection systems, sorting and treatment installations (for recycling, composting, and energy recovery), compliant landfills, hazardous-waste facilities, and traceability systems—are either insufficient or non-existent. Technical expertise and financial resources at national and local levels remain limited. Full implementation requires phased infrastructure development, substantial investment, strengthened enforcement, and time for public-awareness and behavioural-change measures.

Moldova therefore requests transitional periods due to the following structural constraints:

A. Economic and financial constraints:

Current municipal waste recycling rates remain at only 10–12% (2024 data), compared with the EU target of 50% by 2030: e.g., 4-6% paper, 3-4% plastic, 30-42% glass in 2023, with 75% glass imported; overall ~5-10% municipal recycling. Baseline from 2023 (~10% recycled, ~90% landfilled) qualifies for postponements under Article 11(3). Achieving this increase requires large-scale investments in regional landfills, sorting plants, composting/anaerobic digestion facilities, hazardous waste treatment capacity, and C&D waste pre-treatment. Current data (834.7 thousand tonnes collected in 2023, mostly landfilled) shows gaps needing EUR 68 million and additional investments (e.g., EBRD project). Rushing the targets could lead to non-compliance fines or environmental degradation.

B. Low compliance with the EPR legislation:

Although ~9,800 producers were registered in SIAMD by 2025, full EPR enforcement risks placing disproportionate burdens on SMEs, which constitute ~90% of all obligated producers/importers. Premature enforcement could increase producer costs by 20–30%, with knock-on effects on consumer prices and market stability. EPR schemes currently achieve only 25–45% of required collection targets (e.g., batteries target unmet at 25% in 2023). Moreover, cooperation with municipalities remains limited, hindering the establishment of effective separate-collection systems. A transitional period is essential to expand the producer registry, strengthen audit systems, and build the operational capacity of EPR schemes and local authorities.

C. Infrastructure Gaps and Technical Limitations:

Separate-collection systems for recyclables, bio-waste, textiles and construction/demolition waste remain in their infancy, particularly in rural areas. Hazardous-waste infrastructure is almost entirely absent. Rushing implementation would require premature closure of hundreds of non-compliant local dumpsites—164 of which are in water-protection zones—without viable alternatives for waste disposal.

Moldova must design, finance, procure, and construct installations across all six waste-management zones. This includes:

- regional sanitary landfills,
- transfer stations (1–3 per zone),
- sorting and MBT facilities (currently missing in 4 out of 6 zones),
- material-recovery facilities in each zone,
- composting/AD facilities in at least two zones and home-composting promotion elsewhere,
- upgrading of SIAMD and national IT systems for data tracking.

Immediate closure of landfills without operational alternatives would lead to unmanaged waste and non-compliance. A phased implementation allows remediation and closure in line with Government Decision No. 972/2023 (closure of 50% of old landfills by 2030).

D. Institutional capacity limitations:

The Ministry of Environment, Environmental Agency, Environmental Protection Inspectorate, and Local Public Authorities face substantial capacity constraints. Local public authorities lack specialised staff, technical equipment, experience with separate-collection schemes, and capacity to enforce EPR obligations or manage data reporting. National laboratory capacity is insufficient for testing, verification, and compliance monitoring, particularly for hazardous waste, bio-waste quality, and C&D waste. Waste data remains incomplete, undermining planning, reporting, and enforcement.

E. Social and Economic Impact

Reaching the Directive’s targets will affect all stakeholders:

- Local Public Authorities must extend waste-service coverage to rural areas, implement separate-collection systems, and close non-compliant dumpsites, financed through loans and tariff adjustments subject to affordability concerns.
- Waste management operators must upgrade equipment, expand capacities, and adopt modern technologies.
- Households will face higher waste tariffs needed to recover service costs—requiring gradual, socially acceptable increases.
- Public finances will be under pressure due to co-financing obligations, loan repayments, and long-term maintenance of new systems.

A transitional period ensures reforms proceed without compromising social equity or financial sustainability.

F. Technical and logistical challenges:

Moldova faces multiple technical challenges:

- underdeveloped separate-collection systems for recyclables and bio-waste;
- lack of treatment capacity for bio-waste, WEEE pre-treatment, textiles, and hazardous waste;
- absence of energy-recovery technologies;
- co-disposal of C&D waste, manure, hospital waste, and hazardous materials with household waste;
- substandard disposal sites and insufficient laboratory testing capacities;
- unreliable or incomplete waste-flow data;
- insufficient funding for digital systems like SIAMD;
- weak demand for secondary raw materials, affecting recycling market viability.

G. No Impact on the Internal Market, Competition, or Environmental Integrity

The requested transitional period will not negatively affect the EU internal market or create competitive distortions. Moldova contributes only a very small share to EU municipal waste volumes and secondary-materials markets. Moldovan producers represent an insignificant portion of the packaging supply chain within the Union. Existing trade flows—primarily recyclable exports to Romania—will continue under strict Waste Shipment Regulation controls.

There is no risk of environmental dumping. Moldova will maintain full compliance with the Waste Shipment Regulation and the Basel Convention. Planned investments, including the establishment of hazardous-waste treatment facilities and the closure of illegal dumpsites, will reduce, not increase, environmental risks.

H. Medium-Term Contribution to EU Circular-Economy Goals

Once the necessary infrastructure is operational—regional landfills, sorting facilities, civic-amenity sites, and upgraded EPR systems—Moldova will be able to contribute positively to EU circular-economy objectives, including:

- supplying traceable secondary raw materials,
- supporting textile sorting and plastic recycling capacities at regional level,
- enhancing cross-border waste-treatment cooperation.

Thus, this transitional period strengthens—not undermines—the environmental integrity of the internal market and EU long-term circular-economy goals.

In the context of low level of current separate collection systems and composting, the lack of energy recovery technologies, waste streams that are not yet efficiently tracked, affecting planning and reporting, and lack of specialised equipment on proper waste management, the transitional period will allow Moldova to:

- Gradually develop and modernise waste management infrastructure to meet EU standards.
- Build the necessary operational capacity for enforcement and monitoring.
- Secure corresponding funding and implement investment projects.
- Raise public awareness and, on effective separate collection and waste prevention measures.

While Moldova remains committed to align and implement the EU waste management standards, the gradual enforcement of the full obligations under Directive 2008/98/EC is needed to allow sufficient time to manage the burden on public authorities, the private sector, and citizens.

4. Tentative Roadmap for Implementation of Directive 2008/98/EC

Despite the efforts Moldova is making in terms of the improvement and extension of separate collection, secondary separation, developing composting and recycling capacities, 50 percent target for preparing for re-use and recycling of waste materials such as at least paper, metal, plastic and glass from households and possibly from other origins as far as these waste streams are similar to waste from households, is difficult to achieve by the date of accession, primarily due to the need to further develop the required regional waste management infrastructure.

The target will be gradually achieved after establishing and operationalising the integrated waste management system by which recyclables will be separately collected through the EPR and DRS system, and fractions for recycling will be prepared by secondary waste separation in the MBTs, as well by establishing composting lines and home composting for the recycling of organic municipal waste. The integrated waste management system to be developed with the financial support from the “Solid Waste in Moldova” Project will facilitate gradual achievement of the recycling target. In addition, information campaigns related to separate collection at source and

home composting for citizens will be carried out. On 28 October 2025, the preliminary research commission for declaring public utility of national interest decided that the works to create waste management infrastructure within the “Solid Waste in the Republic of Moldova” Project can be declared works of public utility at the national level. The Government is firmly committed to completing this complex project, so that Moldova has a modern waste management system, for the benefit of the population, local communities and the environment.

The requirement for achieving the target of preparing for re-use, recycling and other material recovery, including backfilling operations using waste to substitute other materials, of non-hazardous construction and demolition waste excluding naturally occurring material defined in category 17 05 04 in the list of waste to minimum of 70 percent by weight will be achieved by establishing the infrastructure for the pre-treatment of construction and demolition waste at national level prior to recycling, by designating special locations for collection, as well as establishing infrastructure for treatment and reuse.

Implementation measures for recycling C&D waste include:

- Provision of an appropriate location for C&D waste collection (amenity sites) by municipalities;
- Development of C&D waste treatment infrastructure and infrastructure for storage of the processed C&D waste in the waste management zone.

The requirement for providing an adequate network of treatment installations for hazardous waste will be achieved by establishing the following infrastructure:

- Provision of an appropriate location for hazardous waste collection (amenity sites) by municipalities;
- Building the Centre for Hazardous Waste Management;
- Increasing the capacity for physical-chemical treatment of hazardous waste;
- Development of incineration capacities.

Moldova proposes the following tentative implementation roadmap for the Waste Framework Directive:

Table 5. Planned Actions in the area of Waste Management

Year	Actions/Milestones
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2026-2027	• Adopt amendments to Law No. 209/2016 on waste in order to transpose Directive 2008/98/EC. • Adopt a new Zero Waste and Circular Economy Programme. • Develop and approve the methodologies, guidelines and implementing documents to support the implementation of the new waste related provisions, such as rules for calculation, verification and data reporting on waste and methods for verifying compliance with the targets. • Revise the penalty system for non-compliance with EPR, by amending the Contraventional Code and Law on payment for environmental pollution. • Upgrade the capacity of the reference laboratory of the Environment Agency. • Strengthen the capacities of the Environment Agency and the Environmental Protection Inspectorate by providing them specific training programmes in the field, as well as upgrading technological capacities. • Develop capacity of the Environmental Agency to implement a coordination mechanism for EPR supervision and enforcement. • Adopt amendments to Government Decision No. 682/2018 on the approval of the Concept of the Automated Information System "Waste Management" to ensure better monitoring and traceability. • Develop new modules within the SIA MD automated information system. • Compile the national inventory of landfills and dumpsites. • Approve a closing out plan for unmanaged/unauthorised landfills. • Update the methodology for closing out unmanaged/unauthorised landfills. • Develop and adopt the Biodegradable Waste Strategy. • Conduct national textile flow study; establish producer registry; amend Waste Law to include Article 22a provisions.
2027-2028	• Develop Producer Responsibility Organization (PRO) model; set eco-modulated fees; define support for social reuse networks.
2027-2032	• Develop integrated waste management infrastructure in waste management zones 1, 2, 4, 5, 7 and 8, as follows: - WMZ 5 and 8 - end of 2028 - WMZ 1 - end of 2029 - WMZ 2 - end of 2032 - WMZ 4 and 7 - end of 2030 • Based on the results of the feasibility studies of the integrated management infrastructure sites, dumpsite and landfills closure plan will be developed and approved. • Develop methodologies for calculations of gate fees on landfills.
2028-2034	Provisional closing out schedule of non-compliant landfills: - WMZ 5 and 8 - 2029 - WMZ 1 - 2030-2031 - WMZ 2 - 2033-2034 - WMZ 4 and 7 - 2031-2032 Establish textile sorting hubs; launch municipal separate collection points; support repair/reuse enterprises, mandatory producer registration and fee payment; enforcement and national reporting.
Continuous	• Ensure technical capacities maintaining operationalisation of waste management infrastructure.

	● Carry out information, awareness-raising, and public education campaigns on the correct waste management. ● Train public authorities and conduct awareness activities amongst the LPAs. ● Train inspectors on hazardous waste tracking, EPR audit procedures, and separate collection inspections. ● Update and maintain the waste management reporting system www.siamd.gov.md. ● Provide necessary equipment to the Environment Agency and the Environmental Protection Inspectorate (e.g. computers, sampling equipment, pollution measurement devices, drones, etc.). ● Develop guidelines and methodological instructions to support consistent enforcement and monitoring.
2030- 2045	Ensure monitoring and enforcement including: ● Tracking and developing annual statistics on Recycling rate of municipal waste (% by weight); ● Recycling/reuse rate of paper, metal, plastic, and glass (%); ● Recycling and recovery rate of construction and demolition waste (% by weight); ● Monitor the number of non-compliant landfills/dumpsites closed and rehabilitated; ● Degree of coverage of separate collection systems; ● Installed capacity of recycling, composting, and hazardous waste treatment facilities; ● Percentage of facilities compliant with recycling requirements; ● Number of permits issued for recycling/reuse activities; ● Number of inspections carried out and sanctions applied for non-compliance.

5. Capacity Building and institutional strengthening

Moldova will undertake the following actions in view of capacity building:

- Moldova will undertake a needs assessment for future re-planning in terms of institutional re-organisation of the Environmental Agency and Environmental Protection Inspectorate.
- Strengthening the capacities of the Environmental Agency (EA) and the Environmental Protection Inspectorate (EPI) to ensure the effective implementation of Law No. 209/2016 on waste by providing necessary equipment for their proper functioning (e.g. computers, sampling equipment, pollution measurement devices, drones, etc.).
- Developing guidelines and methodological instructions to support consistent enforcement and monitoring and, therefore, enhance the normative aspects contributing to capacity building of the Environmental Agency and Environmental Protection Inspectorate.
- Organisation of training sessions and study visits to facilitate experience exchange for staff of the EA, EPI, and the Ministry of Environment for enriching professional skills.

Conclusion

The Republic of Moldova, while fully committed to the transposition and implementation of Directive 2008/98/EC on waste, recognises the need for specific transitional periods as follows, to achieve full compliance with the Directive's requirements.

A transitional period of fifteen (15) years from the date of accession for the implementation of Article 22, concerning the separate collection and recycling of bio-waste. This period is necessary to ensure the gradual establishment of the requisite collection systems, treatment and composting capacities, and to secure the financial and institutional conditions required for sustainable implementation across the national territory.

A transitional period of five (5) years from the date of accession for the implementation of Article 11(2a) and Article 11(2b), relating to the preparation for re-use and recycling of waste materials such as at least paper, metal, plastic, and glass, as well as the preparation for re-use, recycling and other material recovery, including backfilling operations, of non-hazardous construction and demolition waste. This extension is justified by the current state of infrastructure development and the need to operationalise regional waste management systems and monitoring mechanisms.

A transitional period of fifteen (15) years from the date of accession for the gradual attainment of the targets set under Article 11(2c), (2d), and (2e), establishing the progressive increase of preparing for re-use and recycling of municipal waste to 55% by 2025, 60% by 2030, and 65% by 2035. The extended period is required to allow for the stepwise development of technical capacities, the expansion of separate collection coverage, and the effective integration of Extended Producer Responsibility (EPR) and Deposit Return Systems (DRS) into the national waste management framework.

A transitional period of seven (7) years from the date of accession for the gradual attainment of the targets set under Article 9a of the revised Waste Framework Directive, establishing a 10% reduction in food waste from processing and manufacturing and a 30% per capita reduction in retail, food services, and households by 2030, relative to 2020 levels. The transitional period is required to allow the Republic of Moldova to develop national food waste measurement systems, progressively implement food donation and surplus redistribution mechanisms (including fiscal incentives), and establish compliance systems within the HoReCa and retail sector. This period will also enable gradual investments in cold storage, logistics, and waste segregation infrastructure to mitigate economic risks in agriculture and food processing. A phased implementation will prevent adverse impacts on producers and households, support accurate data collection, and align Moldova's waste management system with European Union standards in a sustainable and equitable manner.

A transitional period of five (5) years from the date of accession for the implementation of the Extended Producer Responsibility (EPR) scheme for textiles under Article 22a. The transitional period is necessary to enable the establishment of collection and sorting infrastructure, the creation of producer registries and EPR organizations, and the engagement of local authorities and social economy entities. It will also allow Moldova to amend national legislation (including Law No. 209/2016), conduct stakeholder capacity-building, and pilot EPR mechanisms. This phased approach will prevent excessive financial burdens on producers and consumers, safeguard the

affordability of textiles (particularly second-hand goods), and reduce the risk of non-compliance, unregulated incineration, and illicit imports. The transitional framework will facilitate Moldova's integration into the EU circular economy model while maintaining economic and social stability.

A transitional period of five (5) years from the date of accession for the implementation of obligations under Article 22d concerning the management of used and waste textiles. The transitional period is required to allow Moldova to establish and equip national and regional sorting facilities capable of item-level segregation and verification of re-use suitability; to develop methodological guidelines, IT traceability modules within the national Waste Information System (SIA MD), and technical standards for classification, packaging, and labelling of textile fractions. It will also permit the training of personnel within the Environmental Agency, Customs, and the Environmental Protection Inspectorate, and the development of digital tools for real-time monitoring. This phased approach will ensure compliance with EU waste hierarchy and traceability standards while fostering an efficient and transparent textile waste management system.

2. Request for Transitional Period for Implementation of Provisions of Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC

1. Introduction

Moldova requests a 5-year transitional period after accession to the EU for the implementation of Articles 50 (1) and 52 (1) of Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC.

The transitional period is requested to develop necessary infrastructure and ensure full implementation of the Extended Producer Responsibility (EPR) system for all packaging types.

The transitional period is requested for the following provisions:

Article 50: Deposit and return systems.

Article 52: Recycling targets and promotion of recycling.

Article 52: Recycling targets and promotion of recycling.

The Directive set binding targets for Member States covering the whole of their territory as follows:

c) by 31 December 2030, a minimum of 70 % by weight of all packaging waste generated;
(d) by 31 December 2030, the following minimum percentages by weight of the following specific materials contained in packaging waste generated: (i) 55 % of plastic; (ii) 30 % of wood; (iii) 80 % of ferrous metals; (iv) 60 % of aluminium; (v) 75 % of glass; (vi) 85 % of paper and cardboard.

Moldova requests a 5-year transitional period for **paragraph 1 of Article 52**. Moldova will take the necessary measures and proposes to achieve the following recycling targets by 31 December 2035 in accordance with the following intermediate targets:

- 1) recycling of plastics: 50 % by weight by date of accession, 51% for 2031, 52% for 2032, 53% for 2033, 54% for 2034 and a minimum of 55% for 2035;
- 2) recycling of paper and cardboard: 75 % by weight by the date of accession, 77% for 2031, 78% for 2032, 80% for 2033, 82% for 2034 and a minimum of 85 % for 2035;
- 3) recycling of glass: 60 % by weight by date of accession, 63% for 2031, 68% for 2032, 72% for 2033, 76% for 2034 and a minimum of 80% for 2035;
- 4) recycling of metals: 60 % by weight by date of accession, 63% for 2031, 71% for 2032, 74% for 2033, 77% for 2024 and a minimum of 80 % for 2035;

- 5) overall recovery rate: 60 % by weight by date of accession, 63,5% for 2031, 67% for 2032, 70% for 2033, 72,5% for 2034 and a minimum of 70 % for 2035.

Article 50: Deposit and return systems

The Directive sets binding targets by 1 January 2029 for Member States that shall take the necessary measures to ensure the separate collection of at least 90 % per year by weight of the following packaging formats made available on the market for the first time in that Member State in a given calendar year:

- (a) single-use plastic beverage bottles with a capacity of up to three litres; and
- (b) single-use metal beverage containers with a capacity of up to three litres.

Moldova requests a 5-year transitional period for **paragraph 1 of Article 50**. Moldova will take the necessary measures and proposes to ensure the separate collection of at least 90 percent per year for single-use plastic beverage bottles with a capacity of up to three litres and for single-use metal beverage containers with a capacity of up to three litres, with the following intermediate targets:

- 1) by 31 December 2030 : 80 % by weight;
- 2) by 31 December 2031: 82 % by weight;
- 3) by 31 December 2032: 84% by weight;
- 4) by 31 December 2033: 86 % by weight;
- 5) by 31 December 2034: 88% by weight;
- 6) by 31 December 2035: 90 % by weight.

2. Scope

In the case of Moldova, the provisions of the Directive for which a transitional period is requested apply to the following installations, activities and sectors below:

Installations and Activities:

- Municipalities that have to create separate collection system for recyclables in cooperation with the EPR schemes;
- Inter-municipal associations;
- Extended Producer Responsibility systems;
- Deposit Refund System Administrator for single use plastic beverage bottles with a capacity of up to three litres;
- Producers and importers placing on the market packaging and packed products;
- Retail and distribution activities – supermarkets, shops, HoReCa suppliers distributing packed products;
- Municipal waste collection operators, responsible for the collection and transport of separately collected plastic waste;

- Installations and operators for recycling, preparation for re-use, and recovery of packaging and municipal waste;
- Data collection and reporting systems – registers of producers, reporting of placed-on-market, collected and treated EPR waste flows.

Sectors Targeted:

- Waste generators: households – as the primary source of packaging waste, commercial and institutional sector generating waste streams similar to household waste (e.g., offices, schools, retail);
- Commercial sector: producers/importers of packed products and packaging, retail and distribution sector (supermarkets, shops, wholesalers, HoReCa suppliers);
- Waste management sector: municipal services, authorised packaging waste management economic operators, producer responsibility organisations, operators of collection systems, recyclers, recovery facilities;
- Public authorities - municipalities, local public authorities, Environment Agency and Environmental Protection Inspectorate – responsible for ensuring collection infrastructure, authorisations, and monitoring compliance.

3. Current state of play

3.1. Legal framework

3.1.1. National legislation

Moldova has made important steps towards aligning its national legislative framework with the EU requirements in the field of packaging and packaging waste management. The main normative acts regulating this area are:

Law No. 209/2016 on waste which partially transposes the provisions of Directive 94/62/EC on packaging and packaging waste; and establishes the principles of extended producer responsibility, the obligations of authorities and economic operators.

Government Decision No. 561/2020 on the approval of the Regulation on packaging and packaging waste partially transposes the requirements for the prevention, reuse, recycling and recovery of packaging; and provides for recycling targets, labelling requirements and rules for placing on the market of packaging.

The Government Decision No. 561/2020 on packaging and packaging waste establishes the objectives on recovery and recycling of packaging waste, which must be achieved at the national level, in stages, no later than 2029, as follows:

- 1) recovery of at least 50% of the weight of packaging waste;

2) recycling of at least 45% of the total weight of packaging materials contained in packaging waste, with the achievement of the following minimum values for the recycling of each type of material contained in packaging waste:

- a) 45% by weight for glass;
- b) 50% by weight for paper/cardboard;
- c) 40% by weight for metal;
- d) 10% by weight for wood;
- e) 20% by weight for plastic, considering only the material recycled in the form of plastic.

Law No. 1540/1998 on environmental pollution charges sets out the principles for the application of payments for the placing on the market of packaging, but does not ensure a fully functional EPR system.

Government Decision No. 379/2025 on establishment of the Deposit Return System establishes the mechanism for the creation and operation at national level of the Deposit Return System (DRS), unique and applicable to reusable and single-use packaging for which a deposit has been established. The following beverage is subject to DRS: beer, beer cocktails, cider, wine cocktails, wine drinks, other fermented beverages, alcoholic cocktails and non-alcoholic beverages (soft drinks, table water), natural mineral water, spring water, drinking water, juice, nectar, packaged in single-use glass, plastic or metal packaging, with a volume of at least 0.1 liters and up to and including 3 liters. The DRS system is set to become operational by 25 January 2027.

National legislation partially transposes Directive 94/62/EC, and Moldova plans to align with the new requirements of Regulation (EU) 2025/40 by the end of 2027.

The revised and significantly increased recovery and recycling targets for each type of material are presented in Table 1 below, according to the amendment of the Government Decision No. 561/2020 on 10 September 2025).

Table 1. Revised and Increased Recovery and Recycling Targets by Material Type (2025-2030)

Year	Minimum recovery/recycle targets per type of material, %				
	Paper and cardboard	plastic	glass	metals	Wood
2025	25	12	20	20	5
2026	40	25	40	40	10
2027	50	30	45	45	15
2028	60	35	50	50	20
2029	70	40	55	55	25

2030	75	50	60	60	30
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Source: Amendment of Government Decision No. 561/2020 on 10 September 2025

The targets applied before the amendments are presented in Table 2 below.

Table 2. The targets applied before amendments made on 10 September 2025

Year	Minimum recovery/recycle targets per type of material, %				
	Paper and cardboard	plastic	glass	metals	Wood
2023	15	10	15	10	5
2024	20	11	20	20	5
2025	25	12	20	20	5
2026	30	14	25	25	5
2027	40	16	35	30	10
2028	45	18	40	35	10
2029	50	20	45	40	10

Deposit return system for packaging:

Besides this, the Law No. 209/2016 on waste establishes the collection targets for DRS packaging as follows:

- a) 55% – glass, 60% – plastic, 60% – metal, for the first calendar year of operation of the deposit system (2027);
- b) 65% – glass, 70% – plastic, 70% – metal, for the second calendar year of operation of the deposit system (2028);
- c) 75% – glass, 80% – plastic, 80% – metal, starting from the third calendar year of operation of the deposit system (2029).

3.2. Identified gaps

The Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste will be transposed by the end of 2027. The Government

Decision No. 561/2020 on packaging and packaging waste partially transposes Directive 94/62/EC on packaging and packaging waste.

Guiding documents, methodologies and instructions that would support implementation of Government Decision No. 561/2020 which is in force are missing and will be developed and approved, based on the relevant implementing decisions and guidelines adopted at EU level.

3.3. Administrative capacity gaps

- Shortage of specialised personnel, such as inspectors, environmental engineers and IT operators within the competent authorities;
- Insufficient capacity at the Environmental Agency to oversee the implementation of Extended Producer Responsibility (EPR) schemes;
- Limited financial resources for continuous updating and maintenance of the online waste management reporting system (SIAMD);
- There is insufficient cooperation between municipalities and EPR schemes, which hampers the establishment of efficient collection points for waste.

3.4. Implementation status

The Packaging Regulation has been applicable since 2021, but reporting requirements are being applied since 2024 (for the 2023 targets). In 2024, the Law No. 209/2016 on waste was amended to stipulate that importers of packaged products and packaging materials shall not be permitted to place such goods on the market unless duly registered in the official List of Producers subject to Extended Producer Responsibility (EPR). This amendment established a binding obligation for importers to ensure registration in the system and to fulfil their EPR obligations either through participation in a collective compliance scheme or by establishing an individual scheme. The compliance level increased significantly as outlined in Table 3 below which reflects the evolution of the number of economic operators registered in the list of packaging producers.

Table 3. Evolution of the Number of Registered Packaging Producers under Extended Producer Responsibility (2021-2025)

EPR scheme	2021	2022	2023	2024	2025	Total
Collectively	1	7	170	4043	2197	6386
Individually				15	19	35
Total	1	7	227	4057	2214	6421

Source: Environment Agency

3.5.1. State of play in waste management infrastructure

- About 400 economic entities have permit for waste management, of which over 150 are collecting ferrous and non-ferrous metals, while the other are authorised for collection of other recyclables, as follows: 9 authorised plastic treatment installations, 2 authorised glass recycling installations, 2 authorised waste paper recycling installations and about 10 paper waste collection installations.
- One authorised installation for co-incineration of non-hazardous waste (such as tyres and packaging) and for utilisation of by-products from other industrial sectors, including wastes from slag processing, unprocessed slag, and glass-based fibrous materials – operated by SA Lafarge Moldova.
- One authorised installation for recycling of metal scrap – Ribnita Metallurgical Plant – which processes ferrous and non-ferrous metal waste into secondary raw materials for use in the steel industry.
- 8 EPR collective systems and 35 individual systems for packaging and packaging waste (about 6386 producers/importers).
- The DRS producers and retailers are now in process of association and creation of DRS Administrator. The system shall become operational starting from 2027.
- Packaging waste from households, mixed with municipal waste, is collected by waste collection operators. Packaging waste from industrial and commercial flow is collected by private companies or collective schemes and accounted for as part of producer's responsibility and achievement of targets.

Table 4. Packaging Waste Recovery Rates for Paper, Plastic, and Glass in Moldova and Exported Volumes (2020–2024)

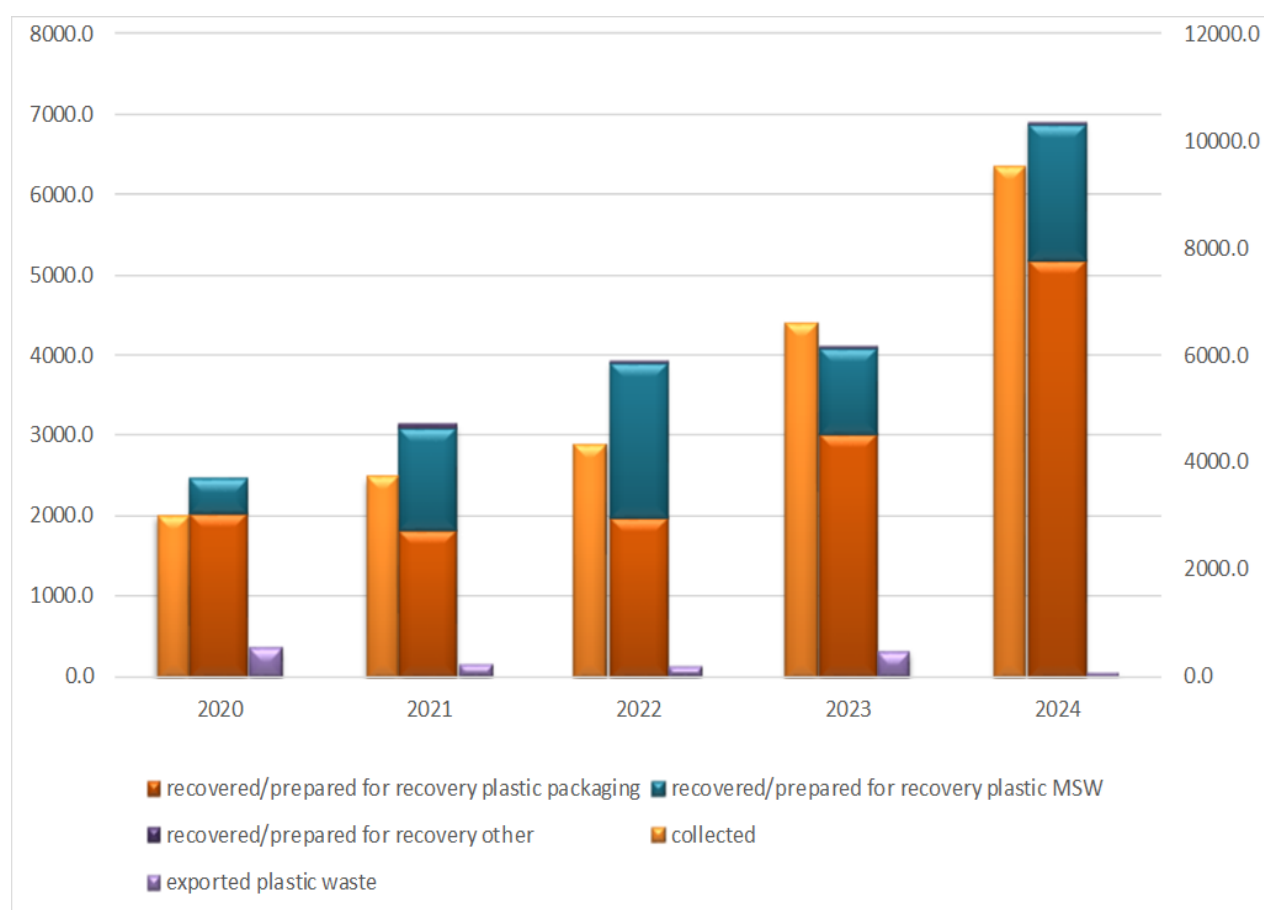
Recovery rate per type of material	2020	2021	2022	2023	2024
paper and cardboard recovery rate, including exported for recovery, %	22.18	28.51	27.13	33.58	36.10
paper and cardboard recovery rate in Moldova, %	3.23	3.21	3.39	4.88	3.26
plastic recovery rate, including exported waste%	3.72	4.15	5.13	5.75	8.83

plastic recovery rate in Moldova, %	3.06	3.88	4.90	5.18	8.76
glass recovery rate from cullet collected in Moldova, %	0.34	62.38	11.54	20.74	1.80
% imported from total recycled	230.53	155.64	75.01	80.25	95.75
paper and cardboard recovery rate, including exported for recovery, %	22.18	28.51	27.13	33.58	36.10
paper and cardboard recovery rate in Moldova, %	3.23	3.21	3.39	4.88	3.26

Source: Environment Agency

Figure 1 below contains data on quantities of plastic waste collected, recovered and prepared for recovery, including quantity exported in tonnes.

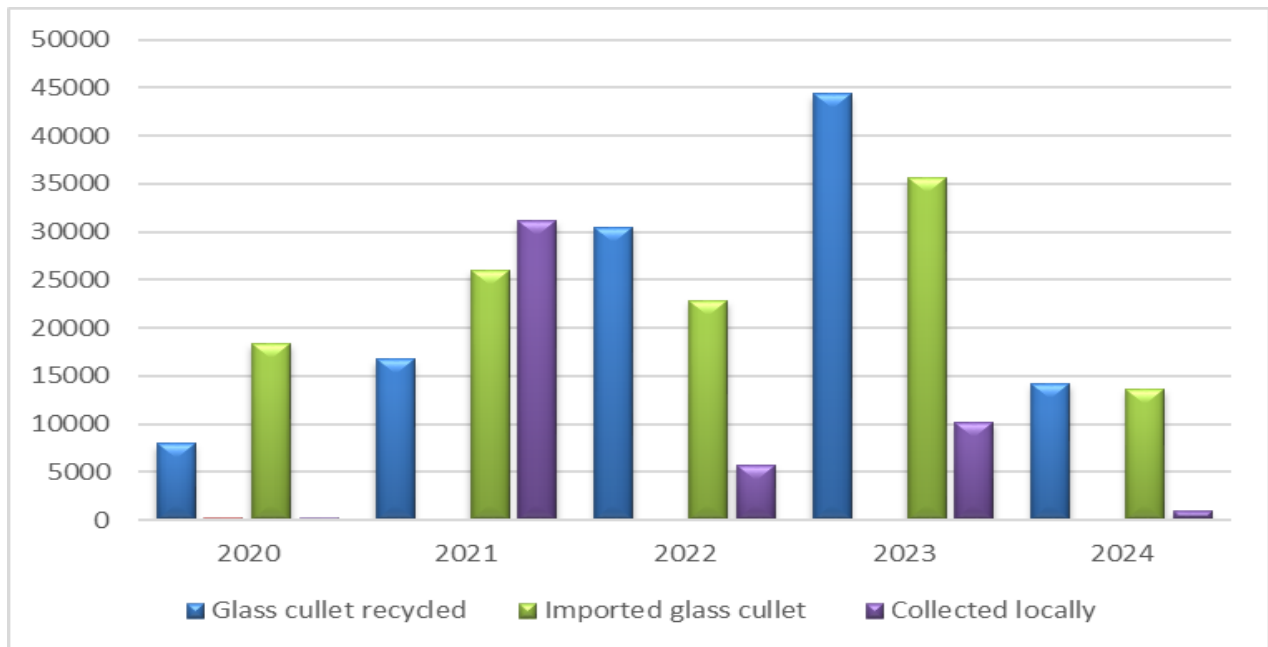
Figure 1. Plastic Waste Collected, Recovered, and Exported (Tonnes)



Source: Environment Agency

Figure 2 below contains data on quantities of glass cullet collected, recycled, including quantity imported in tonnes.

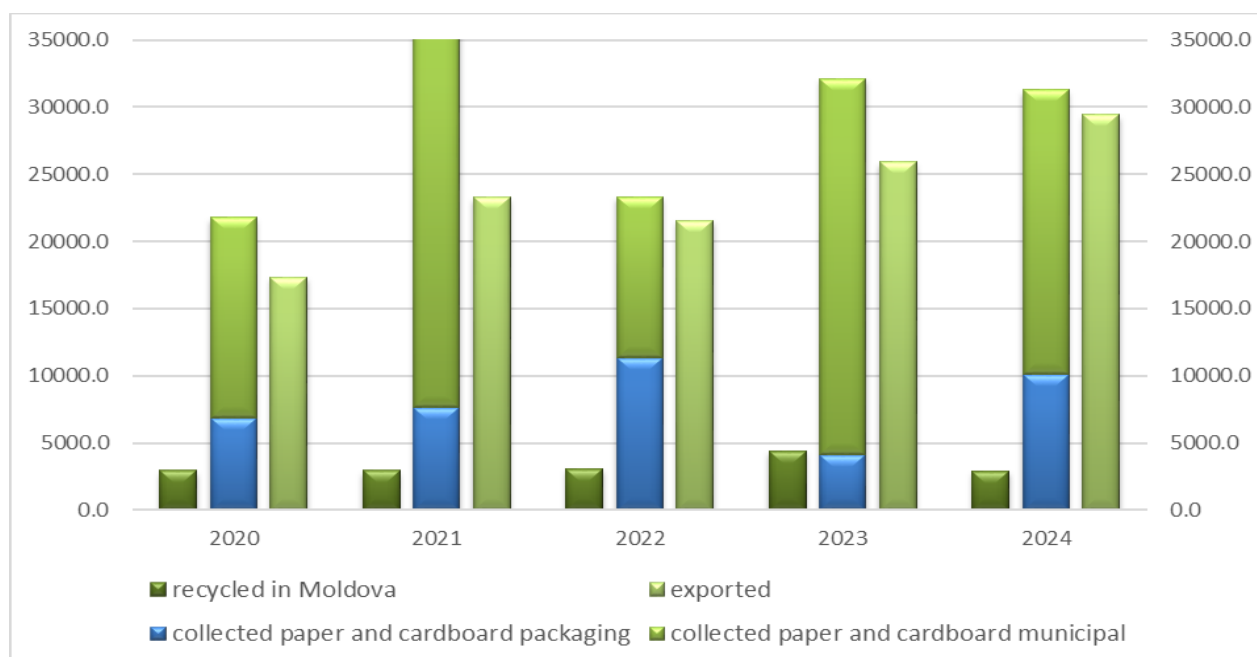
Figure 2. Glass Cullet Collected, Recycled, and Imported (Tonnes)



Source: Environment Agency

Figure 3 below contains data on quantities of paper and cardboard waste collected, recycled, including quantity exported in tonnes.

Figure 3. Paper and Cardboard Waste Collected, Recycled, and Exported (Tonnes)



Source: Environment Agency

The EPR schemes have achieved the targets set in Government Decision No. 561/2020 (much below the Directive 94/62/EC targets), for paper and cardboard, plastic and wood. Achieving the overall recycling and recovery targets remains challenging. Although EPR schemes report compliance with recovery targets, the reported data require further verification and independent audit to ensure their credibility.

3.5.2. Challenges

- The collection coverage for Municipal Solid Waste (MSW) currently covers around 85 percent of urban population and less than 30 percent in rural areas or above 55 percent of total population.
- Separate collection of waste exists in some districts of Chisinau Municipality and in a few other towns and communities, where municipal waste is collected in separate containers intended for collection of different types of waste (glass, paper, plastic/PET and cans).
- Insufficient cooperation between municipalities and EPR schemes, which hampers the establishment of efficient collection points for waste.
- Treatment and pre-treatment for waste are limited and require significant investment to enhance recycling efficiency.
- Poor investments of EPR schemes for EPR waste collection infrastructure from household users, such as packaging, WEEE and batteries. Thus, the collection targets are achieved by EPR schemes only based on waste collected from commercial/institutional sectors.
- Insufficient quality of data reported by the EPR schemes.

- Insufficient capacity at the Environmental Agency to oversee the implementation of Extended Producer Responsibility (EPR) schemes;
- Limited financial resources for continuous updating and maintenance of the online waste management reporting system (SIAMD).
- Lack of essential infrastructure and of fully equipped regional collection and sorting centres and reduced number of collection points and bins for packaging waste.

3.6. Impacted entities

Table 5. List of impacted entities

Entity	Description / Roles	Challenges
Local Public Authorities	Plan and organise the public waste collection service in the locality in accordance with the Law No. 209/2016 on waste, in particular implementation of waste hierarchy, establishment of separate collection, transport, recovery, and final disposal of waste, allocate designated sites for the separate collection of different municipal waste streams and as well as for a complementary collection system for EPR products, as well as development of the local waste management programmes as well as for the regional cooperation.	- Limited coverage with waste collection services, especially in rural areas. - Poor separate collection infrastructure for recyclables, bio-waste, and textiles. - Limited capacity to implement waste management programmes. - Poor cooperation with EPR schemes.
Waste collection operators	Provide waste collection, transport, and disposal services and must be authorised in accordance with the Law on waste No. 209/2016.	- Insufficient technical capacity for separate collection (containers, vehicles). - Continued disposal of mixed waste in non-compliant landfills. - No differentiated gate fees for disposal of recyclable and non-recyclable wastes, along with reduced landfill tax.
Waste Management Operators	Approximately 23 operators are active in collection and recovery of various waste streams (paper, glass, plastic, metals, packaging, etc.).	- Low recycling performance. - Limited treatment capacity and insufficient financial resources (especially bio-waste, textiles, hazardous waste). - Reliance on export of recyclables due to weak domestic secondary materials market.

Extended Producer Responsibility (EPR) Schemes and Producers	Collective and individual compliance schemes, producers and importers subject to EPR obligations (packaging, WEEE, batteries, end-of-life vehicles, oils, tyres, textiles), which have to establish and co-finance collection and treatment in cooperation with the municipalities (for packaging, WEEE, batteries).	- Incomplete coverage of obligated producers. - Insufficient financing and investments in collection infrastructure provided by schemes. - Poor cooperation with municipalities in establishing collection points.
Waste generators - citizens/ households and economic entities	Generators of municipal waste are obliged to participate in separate collection and bear, through tariffs or fees, a share of the costs for improved waste services.	- for separate collection, waste prevention and recycling.

4. Justification for the transitional period

This transitional period is requested due to the following reasons:

- **Economic and financial constraints:** Current municipal waste recycling rates remain at only 10–12% (2024 data), compared with the EU target of 50% by 2030: e.g., 4-6% paper, 3-4% plastic, 30-42% glass in 2023, with 75% glass imported; overall ~5-10% municipal recycling.

Considerable investments will be required for the introduction and operationalization of a national deposit-return system for beverage packaging - estimated at approximately EUR 20 million for initial investments from the private sector.

Further costs are to be estimated but expected to be substantial and are related to:

- o Design & product development costs
- o Compliance with reuse requirements for packaging
- o Harmonized labeling and implementation of the digital passport for packaging
- o Eco-design requirements and recyclable content of packaging
- o Enforcement, oversight, and public administration
- o Innovation / R&D costs
- o Cost of meeting performance / targets
- o Consumer costs

Domestic recycling capacity is limited, forcing reliance on the export of recyclables. Substantial investments are necessary to expand capacity and introduce modern technologies. The current recycling facilities do not allow for meeting the targets by the date of accession; therefore, a phased infrastructural build-up within a transitional period is necessary.

- **Compliance with the EPR legislation:** Around ~9800 producers registered in SIAMD by 2025. Full EPR enforcement risks economic strain on SMEs (comprising ~90% of producers/importers) and importers, potentially increasing costs by 20-30% without phased

support. Data from Environment Agency (EA) shows EPR schemes achieved up to 45% collection targets in 2023, necessitating time for registry expansion and audit systems. Compliance with Article 52 entails significant costs related to eco-design, recyclability requirements, digital passports, conformity assessment, and enforcement. Moldova's SMES would face disproportionate burdens without phased implementation.

- **Infrastructure gaps:** Separate collection infrastructure for recyclables, bio-waste, textiles and C&D waste is in the initial phase of development, particularly in rural areas. Hazardous waste treatment infrastructure is almost non-existent. It would lead to high costs for regional systems and risks of increased landfilling if rushed. Although the Deposit Return System (DRS) will become operational starting in 2027, it will require several years of progressive implementation. The high return rates mandated by Article 50 necessitate a multi-year phased rollout. This process involves ensuring territorial coverage of collection points, nationwide consumer awareness, the progressive onboarding of HoReCa operators, machine-procurement cycles, and contractual alignment between retailers, producers, and the DRS Administrator. Moreover, while the DRS will significantly increase collection rates, achieving the EU-level 90% target requires substantial behavioural adaptation, given that such a system is new for our citizens. In addition, although the DRS will operate at full capacity for approximately 30% of the packaging placed on the market, Moldova must also develop substantial infrastructure to manage the remaining packaging types through the municipal waste system. This infrastructure is planned to be built in phases by 2032 and will require considerable investment to ensure full functionality.
- **Capacity:** Article 50 introduces technically demanding recyclability and recycled-content obligations. The EU Packaging and Packaging Waste Regulation (PPWR) requires packaging to be designed for recyclability and reuse and establishes strict, material-specific design, composition, and recycled-content criteria that must be adopted and enforced across the entire value chain. Article 50's recycled-content requirements presuppose certified and traceable recycled inputs, as well as laboratory capacity to verify compliance. Moldova currently lacks widely available certification mechanisms, uniform testing protocols, and sufficient laboratory capacity for verifying packaging recyclability and recycled-content levels. Meeting Article 50 obligations typically requires product redesign (e.g. mono-material packaging, avoidance of certain additives, controlled use of coatings and adhesives) and procurement of certified recycled inputs. For Moldova's many small and medium-sized producers, these adjustments entail significant up-front costs—such as R&D, tooling, and certification—as well as recurring higher input costs in a market where recycled materials remain scarce.

Moldova requests a transitional period for the implementation of the new EU Packaging Regulation, as Articles 50 and 52 introduce significantly more detailed and technically demanding obligations than those under the previous Packaging Directive. Article 50 requires all packaging to be designed for recyclability and reuse, with strict rules on material composition, recycled

content, and the avoidance of hazardous substances, while Article 52 establishes precise, material-specific recycling targets and comprehensive reporting obligations.

Unlike Directive 94/62/EC, which focused on overall recovery and recycling rates, Regulation (EU) 2025/40 demands advanced product-design adjustments, robust data-collection and traceability systems, and extensive coordination among producers, distributors, and waste-management operators. Given Moldova's current waste-management infrastructure, limited availability of recyclate, and evolving extended producer responsibility framework, a transitional period is essential for building the technical and operational capacities required to ensure sustainable and fully compliant implementation of the Regulation.

4.1. Social and economic impact

The achievement of collection, recovery, recycling and re-use targets, will have a significant impact on multiple categories of stakeholders:

- *Local Public Authorities (LPAs)* will extend municipal waste service coverage to rural populations, develop separate collection schemes. These investments will be financed through the Solid Waste in Moldova Project loan from EBRD and EIB, as well as with the financial contribution from the EPR schemes.
- *Waste collectors* will have to use different bag sizes, bins, or weigh the waste to determine the fee, with lower costs for those who generate less residual waste. Speeded up mandatory recyclability and recycled content requirements may impose disproportionate costs on small producers lacking access to advanced materials, design tools, and conformity assessment services.
- *Waste managers:* Recycling facilities will need to expand capacities and adopt new technologies, and equipment, which will require further investments.
- *EPR Schemes and Producers:* Producers subject to extended producer responsibility obligations will need to increase financial contributions for collection, treatment, and public awareness campaigns, as the targets will increase gradually in order to align with the EU.
- *Citizens/Households:* The households will be charged based on the amount of mixed, non-recyclable and recyclable waste they produce. The speed up shift to recyclable and recycled-content packaging may lead to increased packaging costs, with potential knock-on effects on consumer prices, especially for low-income groups.

5. Tentative Roadmap for Implementation of Regulation (EU) 2025/40

The establishment and proper functioning of the regional waste management systems is planned to be completed by the end of 2032. The following measures in Table 6 are also foreseen as part of Moldova's efforts to align with and implement Regulation (EU) 2025/40:

Table 6. Implementation Timeline and Key Actions for implementation of Regulation (EU) 2025/40

Year	Actions/Milestones
2026-2027	● Adopt amendments to Government Decision on packaging and packaging waste to align with Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste. ● Develop and approve methodologies, guidelines and implementing documents to support the implementation of the new Regulation on packaging and packaging waste. ● Revise the penalty system for non-compliance with EPR, by amending the Contraventional Code and Law 1540/1998 on payment for environmental pollution. ● Strengthen the capacities of the Environment Agency and Environment Protection Inspectorate by enhancing human resources and skills (through targeted training programmes in the field of EPR compliance), and upgrading technological capabilities. ● Develop capacity of the Environmental Agency to implement a coordination mechanism for EPR supervision and enforcement which will allow for review of performance of Producer Responsibility Organisations (PROs), improve enforcement and data quality. ● Setting up minimum performance indicators for separate collection performed by waste collectors.
Continuous	● Carry out campaigns to inform and educate the public on the adequate management of packaging waste. ● Update and ensure proper maintenance of the Automatic Information System Waste Management (SIA MD). ● Organise training programmes and workshops to educate producers and importers on compliance with packaging regulations and reporting obligations. ● Organise training programmes and provide technical assistance for municipalities. ● Moldova will undertake a needs assessment and plan future re-planing in terms of institutional re-organisation of the Environmental Agency and Environmental Protection Inspectorate.

2027-2035	● Develop integrated waste management infrastructure in waste management zones 1, 2, 4, 5, 7 and 8, as follows: - WMZ 5 and 8 - end of 2028 - WMZ 1 - end of 2029 - WMZ 2 - end of 2032 - WMZ 4 and 7 - end of 2030 along with: ● Strengthening the cooperation between the regional waste management operator and the EPR schemes. ● Extending current separate waste collection networks in all urban and rural areas. ● Increasing the recycling and recovery capacity in Moldova for plastic, paper, glass, wood and metal. ● Developing packaging and packaging waste management plan according to Government Decision No. 379/2025 on establishing the deposit system for packaging.
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Conclusion

Moldova reaffirms its commitment to gradually implement the requirements of Article 50 and Article 52 and increase the recycling rates for packaging to meet EU targets. Yet, a transitional period of 5 years will enable Moldova to complete the establishment of regional waste management infrastructure, allow for the stepwise development of technical capacities, the expansion of separate collection coverage, and the effective integration of Extended Producer Responsibility (EPR) and Deposit Return Systems (DRS) into the national waste management framework. This period is necessary to ensure the gradual establishment and operationalisation of the national Deposit Return System, including the development of an extensive network of collection and return points in cooperation with municipalities, retailers, and producers but also the preparation of consumers and economic operators through information and awareness-raising campaigns to secure high participation rates.

3. Request for Transitional Period for Implementation of Provisions of Directive 2000/53/EC on end-of-life vehicles

1. Introduction

Moldova requests a 1-year (one) transitional period after accession to the EU for the implementation of Article 5 (1) (2), and Article 6 (3) of Directive 2000/53/EC of the European Parliament and of the Council of 18 September 2000 on end-of-life vehicles given the current gaps in infrastructure and collection capacity. As of 2025, Moldova has only one authorised treatment facility which is yet to be fully equipped to meet the depollution, dismantling, recycling, and recovery requirements. Most dismantling remains informal, limiting proper recovery and reuse of materials. The lack of a functional IT system for end-of-life vehicles (ELVs) registration, monitoring, traceability, and reporting constraints effective oversight and enforcement.

The transitional period is requested for the following provisions:

a.)	Article	6	-	Treatment
	Article 6 (3) requires that authorised treatment facilities must achieve the depollution of vehicles by removing and properly managing hazardous materials and components (e.g., fluids, batteries, airbags, mercury switches). They must ensure that treatment operations (such as storage and dismantling) are carried out in accordance with environmental protection standards and specific technical requirements set in Annex I of the Directive. This includes proper storage for components, prevention of leaks, and measures for reuse, recycling, and recovery.			

b.) Article 5 - Collection

Article 5 (1) requires Member States to ensure that systems are set up to collect all end-of-life vehicles (ELVs) - from both private and commercial owners - so that they can be transferred to authorized treatment facilities. These systems should also ensure the collection of waste components and materials removed during vehicle repairs (e.g., used parts, batteries, or oil).

Article 5 (2) requires that Member States ensure that all end-of-life vehicles are transferred to authorised treatment facilities.

The requested one-year transitional period as a minimum technical adaptation phase is requested in order to ensure full and sustainable compliance with Articles 5(1)(2) and 6(3) of Directive 2000/53/EC. This period will allow the Republic of Moldova to finalise and operationalise the national ELVs register and IT reporting platform, license and equip several treatment facilities, train staff within the Environment Agency, and the Environmental Protection Inspectorate to ensure better monitoring, and launch public information campaigns for citizens and producers on take-back and collection obligations. Without this short transitional period, Moldova would face a

high risk of non-compliance from the date of accession due to limited infrastructure and institutional readiness.

Although the implementation of the ELV Directive in Moldova will lead to overall positive socio-economic effects through free take-back of end-of-life vehicles and reduced illegal dumping, the main affordability impact risk for citizens is related to fees or transport costs to authorised treatment facilities.

The main financial burden will especially fall on importers and producers, who will need to finance management of each ELV (approximately EUR 20–50 per vehicle) to cover dismantling, depollution, and recycling costs. Also, ELV management facilities (dismantlers) may face higher transition costs, particularly such as for equipment procurement, acquisition and other facility upgrades.

Although the ELV Regulation (Government Decision No. 93/2023) and the Extended Producer Responsibility (EPR) framework have been adopted and have been formally in force since 2024, comprising six collective and eight individual EPR schemes authorised for approximately 582 producers and importers, their effective implementation remains at an incipient stage. While the Regulation establishes ambitious reuse and recovery targets applicable from 2025, practical enforcement is currently impeded by the limited number of authorised treatment facilities—only one of which is presently operational—the predominance of informal operators, and the absence of an integrated IT system capable of ensuring the traceability of end-of-life vehicles from deregistration through to final treatment.

The establishment and operationalisation of these elements necessitate additional time for procurement, licensing, staff training, and system integration, none of which can be fully completed by the anticipated date of accession due to ongoing procurement procedures, budgetary constraints, and the requirement for further technical assistance. In the absence of a transitional period, the Republic of Moldova would face an immediate risk of non-compliance, as the current institutional and operational framework cannot guarantee that all ELVs will be collected, transferred to authorised facilities, and treated in conformity with EU standards from the first day of accession.

A one-year transitional period is therefore required to bridge these gaps and to ensure sustainable, effective, and timely compliance, without affecting the implementation of other provisions of the Directive.

2. Scope

The provisions of the Directive for which a transitional period is requested apply to the following installations and activities below:

Installations and Activities:

- Extended Producer Responsibility (EPR) systems and producers and importers of vehicles;
- Placing on the market of M1 and N1 vehicles – producers, importers, distributors;
- Treatment and dismantling facilities (depollution, disassembly, component/material recovery);
- Transboundary shipments of end-of-life vehicles (ELV) export for treatment/recycling in line with Waste Shipment Regulation (WSR);
- Data collection and reporting systems – registers of producers, reporting of placed-on-market, collected and treated EPR waste flows.

3. Current state of play

3.1. Legal framework

Directive 2000/53/EC is partially transposed in national legislation. The management of end-of-life vehicles is regulated in Moldova by the following normative acts:

- **Law No. 209/2016 on waste** establishes the general framework for waste management, including obligations regarding end-of-life vehicles, but without detailing the requirements of Directive 2000/53/EC.
- **Government Decision No. 586/2020** on the approval of the Regulation on the management of batteries and accumulators and waste batteries and accumulators partially includes provisions on hazardous substances in ELV. The placing on the market of batteries and accumulators containing lead, mercury, or cadmium above the allowed thresholds is prohibited. This prohibition also applies to **automotive batteries** installed in vehicles.
- **Government Decision No. 93/2023** for the approval of the Regulation on the management of end-of-life vehicles, provides for establishment of individual or collective schemes for collection and ensuring recovery and reuse targets.

From 1 January 2025: Reuse and recovery: **85%** or Reuse and recycling: **80%**.

From 1 January 2028: Reuse and recovery: **95%** or Reuse and recycling: **85%**.

Identified Gaps

The Government Decision No. 93/2023 on ELV partially transposed Directive 2000/53/EC. Additional provisions will be included in relation to deregistration component in registration system, operational rules for delivering of ELV to treatment facility. Guiding documents, methodologies and instructions that would support implementation and enforcement of the Government Decision No. 93/2023 will be developed and adopted.

3.2. Institutional framework

In Moldova, the competences regarding the management of end-of-life vehicles are divided between several central and local public institutions, as follows:

The Ministry of Environment is the central authority responsible for developing public policies, harmonising national legislation with the EU *acquis* and general monitoring of the field.

The Environment Agency is responsible for assessing and reporting data on ELV, managing the register of producers and authorising economic operators in the field.

The Environmental Protection Inspectorate is responsible for controlling, inspecting and applying sanctions for non-compliance with the requirements regarding the collection and management of ELV.

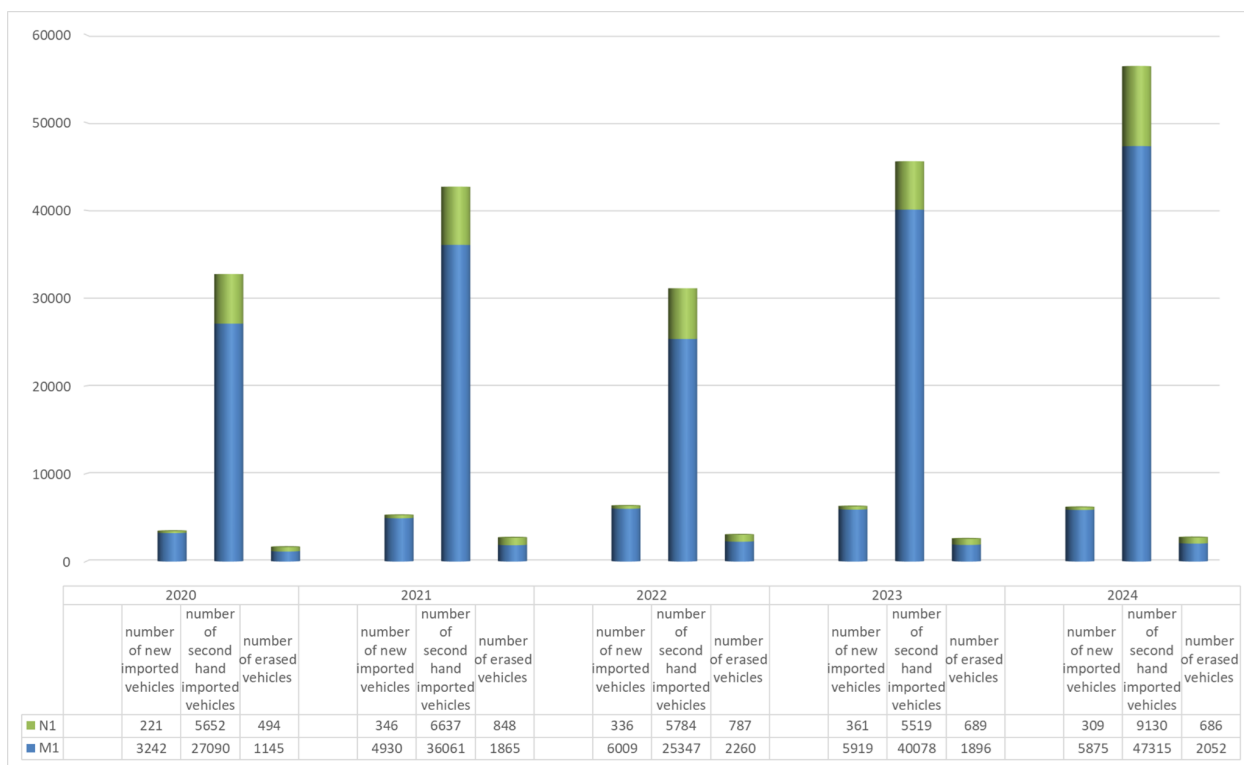
Administrative capacity gaps:

- Insufficient staff in permitting, monitoring, and enforcement authorities; Existing staff has limited experience.
- Insufficient capacity at the Environmental Agency to oversee the implementation of Extended Producer Responsibility (EPR) schemes;

3.3. Implementation Status

Of the total imported vehicles (M1 and N1), 20 percent represent new vehicles, while 80 percent are second hand. The vehicles are imported mostly by individuals who are selling them, and only a part is imported by legal persons. The data on import of M1(passenger cars) and N1 (light commercial vehicles) new and second hand vehicles, and number of erased vehicles from the State Register of Vehicles is presented in Figure 1 below. The data shows a steady increase of second hand imported vehicles.

Figure 1. Import of M1 and N1 new and second hand vehicles and number of erased vehicles from the State Register of Vehicles



Source: Public Services Agency of the Republic of Moldova

The ELV Regulation has been applicable since 2024, and the first report will be submitted by the producers in 2026 for 2025.

In 2024, the Law No. 209/2016 on waste was amended to stipulate that importers of vehicles shall not be permitted to place such goods on the market unless duly registered in the official List of Producers subject to Extended Producer Responsibility (EPR). This amendment established a binding obligation for importers to ensure registration in the system and to fulfil their EPR obligations either through participation in a collective compliance scheme or by establishing an individual scheme. This enforcement mechanism stimulated the implementation of Government Decision No. 93/2023. There are 6 EPR collective systems and 8 individual systems authorised for end-of-life vehicles (about 582 producers/importers).

There is one installation authorised for dismantling of ELV- Metalferos Joint-Stock Company – operating as the country’s largest company for metal scrap collection and preparation for recycling.

In Moldova, most dismantling is carried out informally, without the recovery of reusable materials.

Challenges in implementation also occur in the absence of IT systems for ELV registration, flow monitoring, tracking, traceability and reporting. Households are also reluctant to discard ELV, often keeping them at home instead of delivering them for proper collection and treatment.

Tentative Roadmap for Implementation of Directive 2000/53/EC

Year	Key Actions/Milestones
2026 - 2027	• Develop guiding documents and methodologies for implementation, focusing on ELV delivery rules, certificate issuance, and depollution procedures. • Strengthening the capacities of the Environment Agency and Environment Protection Inspectorate by providing targeted training programs in the field of EPR compliance. • Expand nationwide collection systems through partnerships with the authorized collective EPR systems and individual systems, ensuring wider country coverage and establishing dedicated collection points, with a focus on second-hand imports. • Implement mandatory tracking via the updated Waste Management IT System (SIAMD) for ELV registration, flow monitoring, traceability, and reporting, and interoperability with Customs ensuring preventing illegal dumping, free riders and ensuring transfer to authorized facilities.
2028 - 2029	• Conduct inspections and annual audits of treatment operators for compliance with permitting, technical requirements, and safety measures (Article 6(2)), including pre-registration checks for recovery operations. • Nationwide awareness campaigns on the need for proper management of end-of-life vehicles (continuous) to promote collection of waste components from repairs under Article 5(1) and 5(4)). • Verify depollution standards in all facilities to ensure removal of hazardous components and compliance with Annex I technical requirements as per Article 6(3). • Develop partnerships with neighboring countries (e.g., Romania and Ukraine) for transboundary ELV shipments under the Waste Shipment Regulation to support proper treatment and recovery. • Gradually increase penalties
2030 - 2031	• Optimize IT for efficiency/higher recovery, focusing on reuse/recycling measures and strengthening the capacity of the Environmental Agency and Environmental Protection Agency to control and verify the EPS plans and the traceability of funds. • Compliance checks, including verification of storage/treatment per environmental standards (Article 6(3)), permitting coverage (Article 6(4)), and no market distortions from free delivery (Article 5(4)). • Monitor progress toward 80% ELV collection target as per Environmental Strategy 2024-2030, aligning with Article 5(1) systems setup. • Expand training to include EU best practices on hazardous material removal and environmental standards. • Biennial reporting on environmental/socio-economic impacts, including reduction in illegal exports and verification of no-cost delivery under Article 5(4). • Expanded awareness campaigns on the need for proper management of end-of-life vehicles (continuous) with incentives to reduce informal dismantling and

	encourage proper delivery. Ongoing awareness campaigns on the need for proper management of end-of-life vehicles to sustain collection from repairs and owners and with incentives to prevent informal dismantling and encourage proper delivery.
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Conclusion

Moldova requests a one-year transitional period after the date of accession to the European Union for the implementation of Article 5(1)–(2) on the collection of end-of-life vehicles and Article 6(3) on treatment of such vehicles.

This short transitional phase is required to complete the technical and institutional adjustments.

Article 5 (1) (2) requires Member States to establish systems for the collection of all end-of-life vehicles (ELVs) and to ensure that these are transferred exclusively to authorised treatment facilities. At present, Moldova’s national collection system is still in its initial stage as only one authorised ELV treatment and dismantling installation is operational (Metalferos JSC), the national IT register for ELVs - covering registration, deregistration, and traceability - remains under development; and a significant share of vehicle dismantling and parts recovery continues to occur informally, outside the authorised collection network. The one-year transitional period will allow the licensing of several additional authorised operators; and to implement public awareness campaigns for citizens and producers on free take-back and collection obligations.

Article 6(3) requires that authorised treatment facilities remove and properly manage all hazardous components and fluids (batteries, airbags, oils, mercury switches, etc.) and perform depollution, storage, and dismantling in compliance with environmental protection standards. Moldova currently lacks sufficient treatment infrastructure, trained personnel, and monitoring capacity to meet these standards immediately upon accession.

The transitional year will therefore be used to ensure that authorised facilities have depollution systems and secure storage areas; train technical staff accordingly and strengthen the enforcement capacity of the Environmental Protection Inspectorate.

The one-year transitional period will allow the Ministry of Environment and the Environment Agency to finalise the IT system linking the producer register, vehicle registration, and dismantling facilities.

4. Background Dossier for CHAPTER 27 - Environment and Climate Change

Request for Transitional Period for Implementation of Provisions of Regulation (EU) 2023/1542 of the European Parliament and of the Council of 12 July 2023 concerning batteries and waste batteries, amending Directive 2008/98/EC and Regulation (EU) 2019/1020 and repealing Directive 2006/66/EC

1. Introduction

Moldova fully shares the EU's circular-economy and zero-pollution ambitions. The requested transitional period is not a postponement of obligations, but a mechanism to ensure durable, credible and economically viable compliance with the Regulation, without triggering significant social or financial disruption—particularly in rural areas, where 57% of the population lives, separate collection remains limited, and waste-management infrastructure is insufficient.

Moldova requests a 5-year transitional period after accession for the implementation of Article 59 (paragraph 3), Article 60 (paragraph 3) and Article 10 of Regulation (EU) 2023/1542 of the European Parliament and of the Council of 12 July 2023 concerning batteries and waste batteries, amending Directive 2008/98/EC and Regulation (EU) 2019/1020 and repealing Directive 2006/66/E, to develop the infrastructure and strengthen national systems for the separate collection and recycling of waste batteries and accumulators to meet EU targets. Moldova lacks proper collection and recycling infrastructure, requiring further investments, particularly in rural areas where access to collection points is scarce, transportation networks are underdeveloped, and logistical challenges hinder efficient waste battery recovery.

The transitional period is requested for the following provisions:

a) Article 59 - Collection of waste portable batteries

Article 59 (paragraph 3) of the Regulation stipulates that producers of portable batteries or producer responsibility organisations, shall attain, and maintain durably, at least the following collection targets for waste portable batteries:

- (a) 45 % by 31 December 2023;
- (b) 63 % by 31 December 2027;
- (c) 73 % by 31 December 2030.

b) Article 60 - Collection of waste LMT batteries

Article 60 (paragraph 3) of the Regulation stipulates that producers of LMT batteries or producer responsibility organisations, shall attain, and maintain durably, at least the following collection targets of waste LMT batteries:

- (a) 51 % by 31 December 2028;
- (b) 61 % by 31 December 2031.

Moldova requests a transitional period of **5 years** for implementation of **paragraph 3 of Article 59**. Moldova proposes the following collection targets for waste portable batteries to be attained as follows:

- by date of accession: 60 % by weight;
- by 31 December 2031: 63% by weight;
- by 31 December 2032: 65% by weight;
- by 31 December 2033: 68% by weight;
- by 31 December 2034: 70% by weight;
- by 31 December 2035: 73% by weight.

Moldova requests a transitional period of **5 years** for implementation of **paragraph 3 of Article 60**. Moldova proposes the following collection targets for waste LMT batteries to be attained as follows:

- by date of accession: 51 % by weight;
- by 31 December 2031: 53% by weight;
- by 31 December 2032: 55 % by weight;
- by 31 December 2033: 57 % by weight;
- by 31 December 2034: 59 % by weight;
- by 31 December 2035: 61 % by weight.

c) Article 10 - Performance and durability requirements for rechargeable industrial batteries, LMT batteries and electric vehicle batteries

With regards to Article 10, Moldova requests a transitional period of 5 years to allow economic operators placing rechargeable industrial batteries and electric vehicle batteries on the market to comply with performance and durability requirements. This request is motivated by the complexity of these requirements, which entail preparing the technical documentation described in Annex VIII, which must include methods/standards used, testing conditions, measurement procedures, equations/calculations, assumptions used in estimations. In addition, Annex IV, Part B requires the explanation to include elements such as: battery configuration and chemistry (LFP, NMC, etc.) number of cells and modules, methodology for calculating electrochemical parameters, cycle test conditions, environmental conditions during testing.

Moldovan economic operators, the majority of which are small and medium-sized enterprises, currently lack the technical infrastructure, trained personnel, and data management systems necessary for immediate compliance. In addition, national authorities require additional time to build administrative capacity, adopt implementing legislation, and develop verification and monitoring procedures in line with the Regulation's requirements.

2. Scope

The provisions of the Regulation for which a transitional period is requested apply to the following installations, activities and sectors below:

Installations and Activities:

- Inter-municipal associations;
- Extended Producer Responsibility systems and producers;
- Placing on the market of batteries and accumulators – producers, importers, distributors;
- Transboundary shipments of waste batteries and accumulators – export for treatment/recycling in line with Waste Shipment Regulation (WSR);
- Data collection and reporting systems – registers of producers, reporting of placed-on-market, collected and treated EPR waste flows.

Sectors Targeted:

- Waste generators: households – as the primary source of waste batteries and accumulators, commercial and institutional sectors generating waste streams similar to household waste (e.g., offices, schools, retail);
- Commercial sector: producers and importers of batteries and accumulators, subject to registration, reporting, financing collection and treatment, distributors, obliged to offer deposit refund system for accumulators;
- Waste management sector: municipal services, authorised waste batteries and accumulators management economic operators, producer responsibility organisations;
- Public authorities - municipalities, local public authorities, Environment Agency and Environment Protection Inspection – responsible for ensuring collection infrastructure, authorisations, monitoring compliance.

3. Current State of Play

3.1 Legal Framework

The main regulatory acts regulating this area are:

Law No. 209/2016 on waste:

- partially transposes Directive 2006/66/EC on batteries and accumulators and waste batteries and accumulators;
- establishes the principles of extended producer responsibility, the obligations of authorities and economic operators.

Government Decision No. 586/2020 on the approval of the Regulation on the management of batteries and accumulators and waste batteries and accumulators

- partially transposes Directive 2006/66/EC on requirements for prevention, reuse, recycling and recovery;
- provides for recycling targets, labelling requirements and rules for the placing on the market of batteries and accumulators.

The **collection targets** provided in the amended Government Decision No. 586/2020 (amended on 10 September 2025) are as follows: 1) 45% by 2025; 2) 50% by 2028.

The targets applied before the amendments were: 1) 25% by 2023; 2) 45% by 2025.

The **applicable recovery targets**:

- (a) recycling of 65 percent by average weight of lead-acid batteries and accumulators, including recycling the lead content to the highest degree that is technically feasible while avoiding excessive costs;
- (b) recycling of 75 percent by average weight of nickel-cadmium batteries and accumulators, including recycling the cadmium content to the highest degree that is technically feasible while avoiding excessive costs;
- (c) recycling of 50 percent by average weight of other waste batteries and accumulators.

Alignment with the new requirements of Regulation (EU) 2023/1542 is planned by the end of 2026 by amending Government Decision No. 586/2020 approving the Regulation on the management of batteries and accumulators and waste batteries and accumulators. Guiding documents, methodologies and instructions that would support implementation and enforcement of Government Decision No. 568/2020 will be developed and approved, based on the relevant implementing decisions and guidelines adopted at EU level.

3.2 Institutional Setup

The **Ministry of Environment** is responsible for developing policy documents and draft legislation in the field of waste management and contaminated sites, coordination of implementation of waste management activities at the national level and monitoring of the status of Waste Management Programme implementation.

The **Environmental Agency** is responsible for data collection, technical analysis, and the preparation of annual reports related to waste management and the implementation of Directive 2008/98/EC. The agency also contributes to national reporting obligations under EU and international environmental frameworks.

The **Environmental Protection Inspectorate** is responsible for monitoring compliance of waste management installations and facilities. This includes conducting regular inspections, enforcement activities, and applying sanctions or corrective measures, where non-compliance with environmental legislation is identified.

Local Public Authorities are responsible for planning and organising the public waste collection service in the locality in a way that ensures the application of the Law No. 209/2016 on waste, in particular implementation of waste hierarchy, establishment of separate collection, transport, recovery, and final disposal of waste, allocate designated sites for the separate collection of different municipal waste streams and as well as for a complementary collection system for EPR products, creation of civic amenity sites, development of the local waste management programmes as well as for the regional cooperation.

Customs Service ensures the enforcement of the Art. 12, para (16) of the Law No. 209/2016 regarding the prohibition of placing on the market the products supplied by manufacturers who have not registered in the Registry of EPR Producers.

3.3 Implementation Status

The Regulation on the management of batteries and accumulators and waste batteries and accumulators has been applicable since 2021, but reporting requirements applying since 2022 (for the 2021 targets). Nevertheless, the overall level of compliance by producers remained relatively insufficient. Consequently, in 2024, the Law No. 209/2016 on waste was amended to stipulate that importers of batteries and accumulators shall not be permitted to place such goods on the market unless duly registered in the official List of Producers subject to Extended Producer Responsibility (EPR). This amendment established a binding obligation for importers to ensure registration in the system and to fulfil their EPR obligations either through participation in a collective compliance scheme or by establishing an individual scheme. The compliance level increased significantly, as outlined in Table 1 below on evolution of the number of economic operators registered in the list of batteries and accumulators producers.

Table 1. Evolution of the number of economic operators registered in the list of Batteries and accumulators producers

EPR scheme	2021	2022	2023	2024	2025
Collectively	26	51	8	194	36
Individually	1	2	2	2	
Total	27	53	10	196	36

Source: Environment Agency

The separate collection of waste portable batteries has been carried out mainly through the establishment of collection points within the distribution network.

For waste automotive batteries and accumulators, the collection process is facilitated by a deposit-refund system, whereby consumers can recover the deposit amount when returning the waste accumulator to an authorised car service or commercial centre.

So far, the collection targets have been achieved. However, meeting the recovery and reuse targets remains challenging, as treatment capacities for waste portable batteries are lacking in the country.

Although EPR schemes report compliance with recovery targets, the reported data require more thorough verification by the Environment Agency.

State of play in waste management infrastructure

- About 400 economic entities have permit for waste management, of which over 150 are collecting ferrous and non-ferrous metals, while the other are authorised for collection of other recyclables, as follows: 9 authorised plastic treatment installations, 2 authorised glass recycling installations, 2 authorised waste paper recycling installations and about 10 paper waste collection installations.
- One authorised installation for the recycling of metal scrap – Ribnita Metallurgical Plant, located in the breakaway region of Transnistria – which processes ferrous and non-ferrous metal waste into secondary raw materials for use in the steel industry.
- 6 EPR collective systems and 11 individual systems for batteries and accumulators waste (about 478 producers/importers).

4. Justification for the Transitional Period

Moldova's request for the transitional period to achieve the Regulations's requirements after accession, takes into consideration the following challenges:

Entity	Description / Roles	Challenges
Local Public Authorities	Plan and organise the public waste collection service in the locality in accordance with Law No. 209/2016 on waste, in particular implementation of waste hierarchy, establishment of separate collection, transport, recovery, and final disposal of waste, allocate designated sites for the separate collection of different municipal waste streams and for a complementary collection system for	- Limited coverage with waste collection services, especially in rural areas. - Poor separate collection infrastructure for recyclables. - No established civic amenity sites - Limited capacity to develop/ implement waste management programs. - Poor cooperation of local public authorities with EPR schemes

	EPR products, development of the local waste management programmes as well as for the regional cooperation.	- Non-compliance of local public authorities with landfill closure/rehabilitation obligations - Weak systems for the gate fees on landfills, no differentiated gate fees for disposal of recyclable and non-recyclable wastes, along with reduced landfill tax.
Extended Producer Responsibility (EPR) Schemes and Producers	Collective and individual compliance schemes, producers and importers subject to EPR obligations (packaging, WEEE, batteries, end-of-life vehicles, oils, tyres, textiles), which have to establish and co-finance collection and treatment in cooperation with the municipalities (for packaging, WEEE, batteries).	- Incomplete coverage of obligated producers - Weak enforcement and monitoring of compliance schemes by the Environment Agency and Environment Protection Inspection - Insufficient financing and investment in collection infrastructure provided by schemes - Poor cooperation between EPR collective systems with municipalities in establishing collection points - Low level of achieving the targets set
Waste generators - citizens/ households and economic entities	Generators of municipal waste are obliged to participate in separate collection and bear, through tariffs or fees, a share of the costs for improved waste services.	

Administrative capacity gaps:

- Insufficient staff in permitting, monitoring, and enforcement authorities.
- The Environment Agency currently lacks a dedicated directorate with the necessary competencies and responsibilities to oversee the implementation of Extended Producer Responsibility (EPR) schemes.
- The online waste management reporting system (SIAMD) requires continuous updating and maintenance; however, the availability of financial resources to ensure its proper functioning remains limited.
-
- Lack of essential infrastructure and financial resources, including: waste batteries and accumulators treatment and recycling centers, and systems for monitoring waste streams and traceability of waste batteries and accumulators.

The new EU Batteries Regulation (Articles 10, 59, and 60) significantly increases compliance challenges for Moldova compared to the previous Batteries Directive (2006/66/EC). Article 10 imposes strict performance and durability requirements for industrial, LMT, and electric vehicle

batteries, necessitating robust testing, certification, and documentation for all batteries placed on the market. Articles 59 and 60 establish ambitious collection and recycling targets for portable and LMT batteries, requiring a comprehensive national infrastructure for separate collection, logistics, treatment, and reporting. For Moldova, strengthening the administrative capacity, legal framework, and technical infrastructure to meet these new obligations is demanding. The new Regulation's extensive obligations across the full battery lifecycle—including design, traceability, producer responsibility, and reporting—present substantial technical, financial, and institutional barriers, making timely compliance difficult without dedicated transitional support.

5. Estimated cost and financial constraints

Taking into consideration the limited financial resources, the financial investments involved pose as well a constraint on the ability to fully implement the Regulation (EU) 2023/1542 before accession.

- The procurement of IT equipment for digital traceability and automated reporting would cost approximately EUR 5 million;
- The training of institutional staff and economic operators - approximately EUR 1.2 million;
- External audits and supply chain verifications - approximately EUR 3 million/year.

6. Tentative Roadmap for Implementation of Regulation (EU) 2023/1542

Moldova proposes the following implementation roadmap:

Year	Actions/Milestones
2026-2027	- Develop a regulation to ensure alignment with Regulation (EU) 2023/1542. - Develop and approve the methodologies, guidelines and implementing documents to support the implementation of the Regulation (EU) 2023/1542 (mostly by aligning with the relevant decisions of the European Commission). - Revise the penalty system for non-compliance with EPR, by amending the Contraventional Code and Law on payment for environmental pollution. - Approve guidelines for checking the operational and financial report provided by EPR schemes. - Consolidate capacity of the Environmental Agency to implement or act as a coordination mechanism for EPR supervision and enforcement. - Strengthen the capacities of the Environment Agency and Environment Protection Inspectorate by enhancing human resources and skills (through targeted training programmes in the field of EPR compliance), and upgrading technological capabilities.
Continuous	- Carry out campaigns to inform and educate the public on the proper management of batteries and accumulator waste. - Update and ensure proper maintenance of the Automatic Information System Waste Management.

	- Organise training programmes and workshops to educate producers and importers on compliance with regulations and reporting obligations. - Organise training programmes and provide technical assistance for municipalities.
2027-2035	Development of integrated waste management infrastructure in waste management zones 1, 2, 4, 5, 7 and 8 will allow the following: - Strengthening the cooperation between the regional waste management operator and the EPR schemes. - Extending current separate waste collection networks in all urban and rural areas. - Creation of civic amenity sites for collection of batteries and accumulators, among other types of waste.

Conclusion

Moldova's request for a 5-year transitional period for the implementation of Articles 59(3), 60(3), and 10 of Regulation (EU) 2023/1542 is based on the current infrastructural, institutional, and financial constraints affecting the national system for the collection, recycling, and traceability of batteries and accumulators. While Moldova has made significant progress in transposing EU waste management principles and establishing Extended Producer Responsibility (EPR) schemes, full compliance with the Regulation's targets requires additional time and investment to ensure sustainable and effective implementation.

The requested transitional period will allow Moldova to build its collection and recycling infrastructure and strengthen cooperation between municipalities and EPR schemes. It will also provide the necessary timeframe to enhance data management and establish digital traceability systems, as well as to build the administrative and technical capacity required for supply chain monitoring obligations.

During this period, Moldova will continue to align its national legislation with the Regulation, improve enforcement mechanisms, and progressively increase collection and recycling rates to reach EU targets.

5. Background Dossier for CHAPTER 27 - Environment and Climate Change

Request for Transitional Period for Implementation of Provisions of Council Directive 1999/31/EC of 26 April 1999 on the landfill of waste

1. Introduction

For the implementation of Council Directive 1999/31/EC of 26 April 1999 on the landfill of waste, Moldova requests a transitional period of:

- a. 10 years after accession for the implementation of Art. 5(2);
- b. 15 years after accession for the implementation of Art. 5(5);
- c. 10 years after accession for the implementation of Art. Article 14(c).

The transitional period is requested to develop waste management infrastructure and close existing non-compliant landfills. In Moldova, there are only three compliant and authorised landfills. Moldova has at the moment insufficient treatment capacity for biodegradable waste, and limited financial resources to ensure compliance in the short-term.

The transitional period is requested for the following provisions:

a.) Article 5 - Waste and treatment not acceptable in landfills:

- amount of the biodegradable municipal waste going to landfills reduced;
- amount of municipal waste landfilled reduced from the total amount of municipal waste generated (by weight).

Article 5 of the Directive stipulates that Member States shall set up a national strategy for the implementation of the reduction of biodegradable waste going to landfills. This strategy should include measures to achieve the targets set out in **paragraph 2** which mandates that Member States should achieve the following targets on the amount of biodegradable waste going to landfills:

75% - no later than (2 years after entry in force of the directive + 5 years) - 2006

50% - no later than (2 years after entry in force of the directive + 8 years) - 2009

35% - no later than (2 years after entry in force of the directive + 15 years) - 2016

b.) Article 5 (paragraph 5) of the Directive stipulates that Member States shall take the necessary measures to ensure that by 2035 the amount of municipal waste landfilled is reduced to 10 % or less of the total amount of municipal waste generated (by weight).

c.) Article 14 - Existing landfill sites:

Article 14 (point c) of the Directive, stipulates that any existing landfill shall comply with the requirements of this Directive with the exception of the requirements in Annex I, point 1 within eight years after the entry into force of the Directive.

a.) Moldova requests a 10-year transitional period for Article 5(2) on the biodegradable municipal waste going to landfills that must be reduced from the total amount (by weight) of biodegradable municipal waste produced in 2020 for which consistent and reliable data is available.

Moldova requests this transitional period to achieve the final target of 35% based on data available for 2020 according to the following timeline and intermediate targets:

- by date of accession: the biodegradable municipal waste going to landfills reduced to 85% of the total amount (by weight) of biodegradable municipal waste produced in 2020;
- by 31 December 2031: the biodegradable municipal waste going to landfills reduced to 80% of the total amount (by weight) of biodegradable municipal waste produced in 2020;
- by 31 December 2032: the biodegradable municipal waste going to landfills reduced to 75% of the total amount (by weight) of biodegradable municipal waste produced in 2020;
- by 31 December 2033: the biodegradable municipal waste going to landfills reduced to 70% of the total amount (by weight) of biodegradable municipal waste produced in 2020;
- by 31 December 2034: the biodegradable municipal waste going to landfills reduced to 65% of the total amount (by weight) of biodegradable municipal waste produced in 2020;
- by 31 December 2035: the biodegradable municipal waste going to landfills reduced to 60% of the total amount (by weight) of biodegradable municipal waste produced in 2020;
- by 31 December 2036: the biodegradable municipal waste going to landfills reduced to 55% of the total amount (by weight) of biodegradable municipal waste produced in 2020;
- by 31 December 2037: the biodegradable municipal waste going to landfills reduced to 50% of the total amount (by weight) of biodegradable municipal waste produced in 2020;
- by 31 December 2038 the biodegradable municipal waste going to landfills reduced to 45% of the total amount (by weight) of biodegradable municipal waste produced in 2020;
- by 31 December 2039: the biodegradable municipal waste going to landfills reduced to 40% of the total amount (by weight) of biodegradable municipal waste produced in 2020;
- by 31 December 2040 the biodegradable municipal waste going to landfills reduced to 35% of the total amount (by weight) of biodegradable municipal waste produced in 2020.

b.) Moldova requests a 15-year transitional period for Article 5(5) on the amount of municipal waste landfilled that is reduced from the total amount of municipal waste generated (by weight) produced in 2020 for which consistent and reliable data is available.

Moldova requests this transitional period to achieve the final target of 10% based on data available for 2020 according to the following timeline and intermediate targets:

- by the date of accession: the amount of municipal waste landfilled is reduced to 90% from the total amount of municipal waste generated (by weight);
- by 31 December 2031: the amount of municipal waste landfilled is reduced to 86% from the total amount of municipal waste generated (by weight);
- by 31 December 2032: the amount of municipal waste landfilled is reduced to 82% from the total amount of municipal waste generated (by weight);
- by 31 December 2033: the amount of municipal waste landfilled is reduced to 78% from the total amount of municipal waste generated (by weight);
- by 31 December 2034: the amount of municipal waste landfilled is reduced to 74% from the total amount of municipal waste generated (by weight);
- by 31 December 2035: the amount of municipal waste landfilled is reduced to 70% from the total amount of municipal waste generated (by weight);
- by 31 December 2036: the amount of municipal waste landfilled is reduced to 65% from the total amount of municipal waste generated (by weight);
- by 31 December 2037: the amount of municipal waste landfilled is reduced to 60% from the total amount of municipal waste generated (by weight);
- by 31 December 2038 the amount of municipal waste landfilled is reduced to 55% from the total amount of municipal waste generated (by weight);
- by 31 December 2039: the amount of municipal waste landfilled is reduced to 50% from the total amount of municipal waste generated (by weight);
- by 31 December 2040: the amount of municipal waste landfilled is reduced to 45% from the total amount of municipal waste generated (by weight);
- by 31 December 2041: the amount of municipal waste landfilled is reduced to 40% from the total amount of municipal waste generated (by weight);
- by 31 December 2042: the amount of municipal waste landfilled is reduced to 35% from the total amount of municipal waste generated (by weight);
- by 31 December 2043: the amount of municipal waste landfilled is reduced to 30% from the total amount of municipal waste generated (by weight);
- by 31 December 2044: the amount of municipal waste landfilled is reduced to 20% from the total amount of municipal waste generated (by weight);

- by 31 December 2045: the amount of municipal waste landfilled is reduced to 10% from the total amount of municipal waste generated (by weight).

c.) Moldova requests a 10-year transitional period for Article 14(c) to ensure that all non-compliant landfills are closed as well as ensure compliance with Annex 1 according to the following timeline:

- by the date of accession: 85 % of municipal waste generated landfilled not in compliance with the Directive;
- by 31 December 2031: 77,5 % of municipal waste generated landfilled not in compliance with the Directive;
- by 31 December 2032: 70 % of municipal waste generated landfilled not in compliance with the Directive;
- by 31 December 2033: 59 % of municipal waste generated landfilled not in compliance with the Directive;
- by 31 December 2034: 36 % of municipal waste generated landfilled not in compliance with the Directive;
- by 31 December 2035: 32 % of municipal waste generated landfilled not in compliance with the Directive;
- by 31 December 2036: 25% of municipal waste generated landfilled not in compliance with the Directive;
- by 31 December 2037: 20 % of municipal waste generated landfilled not in compliance with the Directive;
- by 31 December 2038: 15 % of municipal waste generated landfilled not in compliance with the Directive;
- by 31 December 2039: 10 % of municipal waste generated landfilled not in compliance with the Directive;
- by 31 December 2040: 0 % of municipal waste generated landfilled not in compliance with the Directive.

Therefore, by 2040, all illegal landfills will be fully closed and properly secured. Additionally, by 2035, all landfills will be authorised and compliant with EU *acquis* requirements.

2. Scope

In the case of Moldova, the provisions of the Directive for which a transitional period is requested apply to the following installations, activities and sectors below:

Installations and activities:

- Regional waste operators (7 regional operators - one per each Waste Management Zone (WMZ) (1, 2, 5, 7, 8) and 2 regional waste operators in WMZ 4);
- Municipal waste collection operators (around 49 at municipal and community level, and following the development of integrated waste management infrastructure by 2032 - 6 regional sanitary landfills);
- Authorised waste managers (collection, sorting or other forms of preparation for recovery, in case of glass cullet - recycling) for paper, metal, plastic, glass, and other recyclables as follows:
 - Paper and cardboard - 12 economic operators;
 - Wood packaging - 8 installations;
 - Plastic packaging - 20;
 - Glass packaging - 9;
 - Metal packaging - 5.
- Authorised waste managers for other waste flows:
 - Clinical waste - 3;
 - Biodegradable waste - 1.
- Landfill sites receiving municipal waste, including biodegradable fractions;
- Data collection and reporting systems.

Sectors targeted:

- **Waste generators:** households – as the primary source of municipal waste, commercial and institutional sectors generating waste streams similar to household waste (e.g., offices, schools, retail).
- **Waste management sector:** municipal services, authorised waste management economic operators, waste collection services, producer responsibility organisations, recyclers, recovery facilities.
- **Public authorities** - municipalities, local public authorities, Environment Agency and Environmental Protection Inspectorate – responsible for ensuring collection infrastructure, authorisations, monitoring compliance.

During the transitional period of 15 years for full application of Article 5, the targets will be achieved gradually as described in Table 1 below:

Table 1. Gradual targets matrix for the 15-year transitional period for Article 5

	2030	2031	2032	2033	2034	2035	2036	2037
Art. 5(2)	85%	80%	75%	70%	65%	60%	55%	50%
Art. 5(5)	90%	86%	82%	78%	74%	70%	65%	60%
	2038	2039	2040	2041	2042	2043	2044	2045
Art. 5(2)	45%	40%	35%					
Art. 5(5)	55%	50%	45%	40%	35%	30%	20%	10%

3. Current state of play

3.1. Legal framework

National Legislation

Directive 1999/31/EC is transposed in Law No. 209/2016 on waste and Government Decision No. 939/2023 on the approval of the Regulation on the landfill of waste, which establishes the legal framework for waste landfilling operation, the design, construction, operation, monitoring, closure and post-closure monitoring of new and existing landfills. The Regulation introduces measures and guidelines for the prevention and reduction of negative effects on environmental components (surface water, groundwater, soil, air, including the evening effect) and human health caused by landfills throughout their entire life cycle.

Some provisions of the Directive have not yet been transposed, such as the development of a Strategy on the reduction of biodegradable waste going to landfills. Moldova plans to establish a national planning instrument, as part of a New Waste Management Programme 2028-2032, for the implementation of the reduction of biodegradable waste going to landfills.

The targets related to biodegradable municipal waste going to landfills reduction are aligned partially, as follows:

- 1) separate collection, recycling, composting, mechanical-biological treatment, biogas production and energy recovery shall reduce the amount of biodegradable municipal waste going to landfill and, respectively, shall reduce the number of municipal landfills by 15 percent by 2027;
- 2) prepare for reuse of large-size waste, contributing to reducing the amount of waste going to landfill by 25 percent by 2027.

The Law No. 209/2016 on waste provides the following state policy objectives:

- a) by 2025 – introduction of separate collection systems for paper, glass, metals and plastics;

- b) by 2030 – preparing for re-use and recycling of waste, such as at least paper, glass, metals and plastics from household products and possibly from other sources, in so far as these waste streams are similar to waste from household consumption, shall be increased to a minimum of 30 percent of the total mass;
- c) by 2030 – preparing for re-use and other material recovery operations, including backfilling operations, using waste to replace other substances, non-hazardous construction and demolition waste, excluding natural geological materials, shall be increased to a minimum of 55 percent of the total mass.

The National Programme for Waste Management, approved by Government Decision No. 816/2023 focuses on reducing the amount of waste generated, increasing by up to 40-60 percent the recovery and recycling rate of products subject to the EPR and increasing the level of awareness regarding the importance of waste management by 2027:

- a) Specific Objective 2.1. Prevention of waste generation - 30 percent reduction in the amount of waste disposed of at landfills
- b) Specific Objective 2.2. Reducing the amount of recyclable municipal waste disposed of at landfills - Reduction of recyclable fractions from municipal waste disposed of through recycling as follows:
 - plastics – at least 35%;
 - paper – at least 25%;
 - glass – at least 50%.

Law No. 178/2025 on the public sanitation service establishes the unitary legal and institutional framework regarding the establishment, organisation, management, financing, monitoring and control of the operation of the public sanitation service of localities, including the administration and operation of the infrastructure related to this service.

By the end of 2026, Moldova plans to revise the Law No. 209/2016 on waste and amend Government Decision No. 939/2023 on the approval of the Regulation on the landfill of waste to transpose Directive 1999/31/EC by:

- providing clear regulations on the obligation to pre-treat waste before landfilling (Article 6(a) of the Directive), and adjusting the authorisation procedure to explicitly provide for the submission of a waste management plan in accordance with Annex I, point 1 of the Directive.
- establishing concrete deadlines in the regulatory framework and waste legislation for completing the closure of landfills that do not comply with the requirements.

With the support of the Solid Waste in Moldova Project, financed by European Bank for Reconstruction and Development (EBRD), European Investment Bank (EIB), Eastern Europe Energy Efficiency and Environment Partnership (E5P), Moldova plans to close the uncompliant landfills according to the following deadlines:

- WMZ 5 - by the end of 2028
- WMZ 8 -by the end of 2028
- WMZ 1 - by the end of 2029
- WMZ 4 and 7 - by the end of 2030
- WMZ 2 - by the end of 2033

Once the Solid Waste in Moldova Project is completed, Moldova will have 6 operation compliant landfills, one in each WMZ.

3.3. Institutional framework

The **Ministry of Environment** is responsible for developing policy documents and draft legislation in the field of waste management and contaminated sites, coordination of implementation of waste management activities at the national level and monitoring the status of Waste Management Programme implementation.

The **Environmental Agency** is responsible for data collection, technical analysis, and the preparation of annual reports related to waste management and the implementation of Directive 2008/98/EC. The agency also contributes to national reporting obligations under EU and international environmental frameworks.

The **Environmental Protection Inspectorate** is responsible for monitoring compliance of waste management installations and facilities. This includes conducting regular inspections, enforcement activities, and applying sanctions or corrective measures, where non-compliance with environmental legislation is identified.

Local Public Authorities are responsible for planning and organising the public waste collection service in the locality in a way that ensures the application of the Law No. 209/2016 on waste, in particular implementation of waste hierarchy, establishment of separate collection, transport, recovery, and final disposal of waste, allocate designated sites for the separate collection of different municipal waste streams and as well as for a complementary collection system for EPR products, development of the local waste management programmes as well as for the regional cooperation, calculation of the amount of the municipal waste management fee from waste holders and its collection.

Inter-municipal associations are responsible for organising the activity of the integrated municipal waste management system, in particular supervision and control of contractual obligations between the administrator of the integrated municipal waste management system and the operator of the municipal waste management service, and other functions entrusted by local public administration authorities regarding the organisation of the integrated municipal waste management system.

Regional Operators are responsible for the following activities:

- Operation of integrated waste management service in each WMZ including separate collection, transfer, sorting/MBT/composting/landfill operations;
- Calculate, propose, and collect tariffs for integrated waste management service across the WMZ;
- Operate Integrated Waste Management infrastructure including, transfer stations, sorting and composting stations, bio-waste facilities and landfills; hold permits and ensure monitoring and closure/after-care where applicable;
- Consolidate regional data and report annually via SIA MD to the central Environmental Agency, and support local plan monitoring;
- Ensure operations meet environmental protection requirements and any selective collection obligations set in national waste legislation;
- Support awareness campaigns and user information duties embedded in local/national waste management programmes.

3.4. Implementation status

The Landfill Directive 1999/31/EC is implemented along other waste management requirements, in particular taking into consideration the targets set by the Waste Framework Directive 2008/98/EC, Regulation (EU) 2025/40 on Packaging and Packaging Waste (repealing Directive 94/62/EC) and Single-Use Plastics Directive 2019/904/EU. These Directives will guide the efforts for collecting and treating the municipal waste, and their implementation will impact, in the end, the amounts of waste to be diverted for other types of treatment and/or to be disposed of at landfills.

Moldova's request for the transitional period takes into consideration the currently existing waste management infrastructure which is insufficiently developed to attain the targets for the amount of municipal waste landfilled and for the amount of biodegradable waste going to landfills as well as to meet the requirements regarding existing landfills as set by Council Directive 1999/31/EC.

- It should be noted that the collection coverage for municipal solid waste (MSW) currently covers around 85 percent of urban population and less than 30 percent in rural areas or above 55 percent of total population.
- The separate collection of waste exists in some districts of Chisinau Municipality and in a few other towns and communities, where municipal waste is collected in separate containers intended for collection of different types of waste (glass, paper, plastic/PET and cans).
- There are 3 authorised landfills and about 500 unmanaged landfills, about 600 dumpsites where the population is discarding waste (please see table 6). 164 landfills are located in the water body protection area; 292 landfills are located at a distance of less than 500 m from the residential sector.
- There is 1 transfer station in Chisinau, 2 sorting stations (in Chisinau and Falesti), 2 composting stations in Chisinau. Only one sanitary landfill is under operation in Chisinau,

while there are several smaller landfills (up to 6) under operation at district level that partially comply with the sanitary landfill requirements.

- About 400 economic entities have permit for waste management, of which over 150 are collecting ferrous and non-ferrous metals, while the other are authorised for collection of other recyclables, as follows: 9 authorised plastic treatment installations, 2 authorised glass recycling installations, 2 authorised waste paper recycling installations and about 10 paper waste waste collection installations;
- Municipal waste collection in urban areas follows a "door-to-door" system for individual houses and a collection-point system for residential blocks;
- In rural areas, waste collection is conducted mainly through a "gate-to-gate" approach or, occasionally, at collection points. The key features of this system include:
 - Collection frequency: weekly or biweekly for individual homes, and daily for residential blocks. Similar waste from businesses and institutions is collected based on requests.
 - Containers: 1.1 m³ containers are used at collection points and 120 l and 240 l bins are used for individual houses.
- Approximately 30-50 percent of household waste containers were purchased over 15 years ago. Many other localities still use containers purchased between 2005 and 2010.

Even though municipal waste contains a high degree of organic components up to 50 percent, there are no facilities for biological treatment of municipal waste. There are no facilities for incineration of municipal waste in Moldova.

Separate collection infrastructure remains at its early stage of development in both urban and rural areas.

The implementation of integrated waste management systems is envisaged within the following deadlines:

- WMZ 5 - end of 2028;
- WMZ 8 - end of 2028;
- WMZ 1 - end of 2029;
- WMZ 4 and 7 - end of 2030;
- WMZ 2 - end of 2032.

Municipal waste generation indicators in Moldova for the period 2020-2024 are below the European average. This is explained by low consumption, determined by much lower purchasing power and the fact that the rural population accounts for a large share. The waste collection and landfilling data reported in SIAMD were used to estimate the average per capita waste generation indicators (please see examples in Table 2), which will serve as the basis for determining the size of the integrated waste management system.

Table 2. Municipal Waste Generation and Estimated Per Capita Indicators by Locality (2020–2024)

Name of the waste operator	Locality	Quantity of waste, tonnes	Number of population , inhabitants	Estimated per capita indicator, kg/year
Municipal Enterprise Regia Autosalubritate	Chisinau municipality (urban)	187 341	552 124	340
Municipal Enterprise DRCD Balti	Balti municipality (urban)	32 997	114 472	288
Municipal Enterprise RCL Vatra	Chisinau suburb (rural)	551	3345	164
Municipal Enterprise Î.M.G.C.L. Cahul	Cahul municipality (urban)	12668	36000	352
Municipal Enterprise IMDP "Apa-Canal" Anenii Noi	Anenii Noi (urban)	2530	7452	339
Prest Energy SRL	Malcoci (rural)	222	1100	200

Source: Environmental Agency

Landfills do not meet sanitary and ecological requirements, respectively, the volume of household waste accumulated since their operation is not known.

Currently, in Moldova, there are only 3 compliant and authorised landfills:

1. Tintareni landfill operated by Î.M. „Regia Autosalubritate”;
2. Nisporeni landfill operated by Î.M. „Gospodaria Comunala Nisporeni”;
3. Ungheni landfill operated by „AVE Ungheni” S.R.L.

The construction of integrated waste management systems for regions 5 and 8 is expected to begin in 2026 and completed by 2028, the amount of municipal waste collected and stored will increase by 11.2 percent compared to 2020, against the backdrop of full coverage of sanitation services throughout the country. At the same time, by 2027, the amount of separately collected and recycled waste is expected to increase by 239 percent, and composted waste by 337 percent compared to 2020, as these will be diverted from the municipal waste stream through the promotion of separate collection. In addition, with the closure and recultivation of all non-compliant landfills and the construction of one regional landfill, the number of landfills will be reduced by 99.3 percent by 2032, and the area of landfills will be reduced by 87 percent by 2032.

Moldova faces several challenges in achieving the Directive’s requirements before accession.

- There is limited access to waste management services in many communities. The service coverage is still low: approximately 85 percent of urban population has waste collection, and less than 30 percent in rural areas (estimated at 55 percent of total coverage).
- The separate collection is still weak because it is limited to Chisinau and a few towns. Also, the infrastructure is still in the early stage of development.
- The recycling rate of municipal waste is approximately 12 percent in 2024. There is no scheme in place for construction and demolition waste and most of it is landfilled.
- The treatment facilities are limited. There is no biological treatment in place; and the organic waste (approximately 50 percent of MSW) remains unmanaged, while the EPR flows need to be exported.
- The national recycling capacity is low and most recyclables are exported. Repair and reuse sector exists but relies primarily on underfunded small and medium-sized enterprises (SMEs).
- There is no nationwide infrastructure for bio-waste and textile collection and the Textile regulation is still under development and is planned for 2026.
- There are challenges in collecting data. The reported amounts of separately collected recyclables are uncertain due to low operator capacity.
- Poor quality of sorted waste, low performance of the collection rates, and underdeveloped recycling/recovery markets.

3.5. Impacted entities

Table 3. List of impacted entities

Entity	Description / Roles	Challenges
Local Public Authorities	Plan and organise the public waste collection service in the locality in a way that ensures the application of the Law No. 209/2016 on waste.	- Limited coverage with waste collection services, especially in rural areas. - Poor separate collection infrastructure for recyclables, bio-waste, and textiles. - Limited capacity to develop/ implement waste management programs. - Poor cooperation with EPR schemes - Non-compliance with landfill closure/rehabilitation obligations - Weak systems for the gate fees on landfills, no differentiated gate fees for disposal of recyclable and non-recyclable wastes, along with reduced

		landfill tax.
Waste collection operators	Provide waste collection, transport, and disposal services and must be authorized in accordance with the Law on waste no. 209/2016.	- Insufficient technical capacity for separate collection (containers, vehicles). - Continued disposal of mixed waste in non-compliant landfills. - Limited enforcement of permit conditions - Non-compliance with landfill closure/rehabilitation obligations - Weak systems for the gate fees on landfills, no differentiated gate fees for disposal of recyclable and non-recyclable wastes, along with reduced landfill tax.
Waste Management Operators	Approximately 400 authorized operators are active in collection, recycling, and recovery of various waste streams (paper, glass, plastic, metals, packaging, etc.).	- Low recycling performance - Limited treatment capacity and insufficient financial resources (esp. bio-waste, textiles, hazardous waste). - Reliance on export of recyclables due to weak domestic secondary materials market. - Gaps in compliance with technical standards. - Limited selective collection and pre-treatment of C&D waste. - Predominant landfilling or dumping of C&D waste. - Absence of recycling infrastructure for C&D waste. - Limited hazardous waste treatment and storage capacity.
Extended Producer Responsibility (EPR) Schemes and Producers	Collective and individual compliance schemes, producers and importers subject to EPR obligations (packaging, WEEE, batteries, end-of-life vehicles, oils, tyres, textiles), which have to establish and co-finance collection and treatment in cooperation with the	- Incomplete coverage of obligated producers. - Insufficient financing and investment in infrastructure provided by EPR schemes - Poor establishment of collection points. - Targets underachieved for packaging, WEEE, and other streams, although the targets are far below the EU targets.

	municipalities (for packaging, WEEE, batteries).	
Large and small generators of biodegradable waste	Households, food-processing industries, restaurants, catering services, markets, and institutions such as schools and hospitals – will be directly impacted by the progressive landfill diversion targets	- Limited separate collection of organic waste at source. - Reduced level of home or community composting. - Very limited sorting, reporting, and delivery to authorised facilities of commercial biodegradable waste.
Waste generators - citizens/ households and economic entities	Generators of municipal waste are obliged to participate in separate collection and bear, through tariffs or fees, a share of the costs for improved waste services.	- Illegal dumping or disposal at non-compliant sites.

4. Justification for the transitional period

Moldova's request for transitional periods under Articles 5(2), 5(5) and 14(c) of Directive 1999/31/EC is driven by a clear political commitment to fully implement EU environmental standards while ensuring that the transition remains socially equitable, economically viable, and institutionally manageable. Waste management reform is one of the most complex and capital-intensive areas of the environment chapter, requiring structural change across municipalities, operators, regulators and households. Despite major progress and unprecedented investment efforts, Moldova faces an inherited system characterised by decades of under-financing, fragmented infrastructure, and a large number of non-compliant disposal sites, which cannot be brought to EU standards before accession without disproportionate economic, social and environmental consequences. The requested transitional period therefore reflects not a delay of obligations, but a realistic and responsible sequencing of reforms that safeguards public health, ensures affordability for citizens, and aligns infrastructure development with the strategic EU-supported investment pipeline already underway.

A longer transitional period is necessary because Moldova is not starting from a partially compliant baseline but from a fundamentally different structural reality: over 500 non-compliant dumpsites, only three authorised landfills, minimal separate collection, and no biological treatment capacity

for biodegradable waste, which represents up to 50% of municipal waste. Meeting the Directive's targets requires not only upgrading existing installations but building an entirely new waste management system, including six regional landfills, transfer stations, MBT plants, separate collection fleets, and bio-waste treatment facilities—investments that depend on large, phased international financing tranches and multi-year construction cycles. The timelines requested therefore reflect the real pace at which such infrastructure can be financed, contracted, built, and made operational, especially in a low-income country with a highly dispersed rural population and limited tariff-raising capacity. In short, the duration is not a request to delay effort, but the minimum realistic timeframe to ensure full, credible, and sustainable compliance—avoiding the risk of failing prematurely due to insufficient infrastructure, unaffordable costs for households, or unmanageable institutional burdens.

4.1. Social and economic impact

- **Waste Collection Operators:** Municipal and private operators will need to modernise their fleets and infrastructure, acquiring new collection vehicles, containers, sorting equipment, and digital tools for monitoring and reporting.
- **Waste Managers / Recycling Sector:** recycling and recovery facilities will be required to expand treatment capacities and align with EU environmental and technical standards. Meeting these requirements will most probably require access to loans or private capital, which remains challenging.
- **EPR Schemes and Producers:** Producers covered by Extended Producer Responsibility (EPR) obligations (e.g. for packaging, WEEE, batteries, tyres, oils, textiles) will face higher financial contributions to support collection, treatment, and awareness campaigns. These additional costs will ultimately increase consumer prices.
- **Large and small generators of biodegradable waste** will have to implement separate collection of organic waste at source, participate in home or community composting schemes, and deliver clean biodegradable fractions to municipal collection systems. Awareness-raising, training, and the introduction of clear regulatory obligations will be key to ensuring participation and minimising contamination of biodegradable fractions.
- **Citizens / Households:** Households will experience tariff increases to reflect the costs of improved waste services.
- **Public Finances:** Both national and local budgets will face additional pressure due to repayment of international loans (e.g., from EIB and EBRD) taken to finance waste infrastructure. A phased and gradual introduction of tariffs and compliance measures will be essential to maintain affordability.
- The local public authorities will allocate the land for the construction of transfer stations and integrated waste management centres.

4.2. Estimated cost and financial constraints

Current sources of financing (local budgets and tariff revenues) are insufficient to cover the investment and operational costs required by the directive. Without external financial support through pre-accession instruments and/or bilateral assistance, the public budget cannot support the implementation effort in the short term.

In this context, Moldova has concluded a Financing Agreement with the European Investment Bank and the European Bank for Reconstruction and Development, which will allow the creation of waste management infrastructure throughout the territory of Moldova.

To cover the implementation costs, Moldova has signed a Loan Agreement with the European Bank for Reconstruction and Development and the European Investment Bank, for the purpose of implementing the Moldova Solid Waste Project. The project is also supported by a grant part provided by E5P. The Project aims to regionalise waste management by territorially dividing the country into 6 waste management regions and its total estimated value is over EUR 200-250 million. The project is scheduled for completion by the end of 2032.

The transition to full compliance with the Landfill Directive as well the Waste Framework Directive requires large-scale investments estimated at several hundred million EUR, primarily in the following areas:

- Construction of regional sanitary landfills;
- Closure/rehabilitation of more than 500 unmanaged landfills;
- Establishment of sorting and mechanical-biological treatment (MBT) plants in 2 (two) out of the 6 (six) waste management zones;
- Establishment of material recovery facilities in each waste management zone;
- Building transfer stations (1-3 per zone);
- Development of composting and anaerobic digestion plants for bio-waste in 2 zones and promote home composting in other zones;
- Purchase of separate collection infrastructure (waste collection and vehicles for both mixed and separate collection) for urban and rural municipalities;
- Establishment of hazardous waste management infrastructure, including storage facilities, treatment units, and incineration plants;
- Upgrading the national reporting system (SIAMD) and IT infrastructure for data reporting, verification and monitoring.

4.3 Technical and logistical challenges

The main technical challenges that Moldova faces in meeting the Directive's requirements before accession are:

- There are 500 non-compliant dumpsites currently used by local authorities for the waste disposal. These dumpsites do not meet sanitary and environmental standards, and the volume of accumulated household waste since they have been operating is unknown. At

present, only 3 compliant and authorised waste landfills exist in Moldova. Landfills do not meet sanitary and ecological requirements: 164 landfills are located in the water body protection area; and 292 landfills are located at a distance of less than 500 m from the residential sector.

- The collection coverage for municipal solid waste (MSW) currently covers around 85 percent of urban population and less than 30 percent in rural areas or above 55 percent of total population.
- Separate collection of waste exists in some districts of Chisinau municipality and in a few other towns and communities, where municipal waste is collected in separate containers intended for collection of different types of waste (glass, paper, plastic/PET and cans);
- Insufficient capacity for final waste disposal, built and operated in accordance with environmental standards.
- Disposal of hazardous waste, including hospital waste, together with household waste at solid waste landfills, which poses an increased risk to the environment.
- Chaotic dumping of construction and demolition waste, animal manure, street waste.
- Insufficient funding for waste management at the state and private levels.
- Challenges in collecting data on waste generation and management, including separate collection, recovery, reuse, recycling, landfilling, and of approved methodology for estimation of recovery, reuse, preparing for re-use and recycling targets, in accordance with the EU approaches.

If the transitional period were not granted, Moldova would face serious operational and environmental risks. Premature closure of non-compliant landfills, without alternative regional facilities yet operational, would lead to illegal dumping in other sites, uncontrolled waste burning, and pressure on the few existing authorised sites—undermining the Directive’s purpose. Municipalities would face sudden tariff shocks, generating public resistance and undermine the efforts of separate collection schemes. Waste operators could struggle to finance rapid upgrades, leading to service interruptions and unrecoverable financial losses. These risks would pose serious environmental and health consequences, disproportionately affect institutional capacities to issues permits, superficial EIAs, and inconsistent enforcement.

The proposed transitional period is designed precisely to avoid such risks by synchronising targets with the construction and full operationalisation of new infrastructure, the maturation of EPR systems, and planned tariff adjustments as well as structural behavioral changes. Milestones, monitoring obligations, and clear intermediate targets ensure that progress is measurable, irreversible, and fully aligned with EU requirements.

5. Roadmap for Implementation of Directive 1999/31/EC

The target will be possible to achieve after establishing the integrated waste management system by which recyclables will be separately collected through the EPR and Deposit Return System (DRS) and fractions for recycling will be prepared by secondary waste separation in the mechanical-biological treatment plants (MBTs), as well by establishing composting lines and home composting for the recycling of organic municipal waste. In addition, information campaigns related to separate collection at source and home composting for citizens are foreseen.

The development of the integrated waste management system and appropriate infrastructure is currently ongoing based on the Solid Waste in Moldova Project, funded by the European Investment Bank and the European Bank for Reconstruction and Development, as well as a part of the grant provided by E5P.

Table 4 below presents the waste management regions and the planned infrastructure.

Table 4. The waste management regions and the planned infrastructure

Waste management zone	Infrastructure planning regional waste management infrastructure (Government Decision No. 972/2023)
Zone No. 1 - Cahul, Cantemir, Taraclia, Ceadir-Lunga and Vulcanesti	1 regional landfill, including: 1 sorting station and 1 composting facility; 2 transfer stations.
Zone No. 2 - Leova, Cimislia, Basarabeasca, Causeni and Stefan Voda	1 regional landfill, including, 1 sorting station and 1 composting facility; 2 transfer stations.
Zone No. 4 - Chisinau, Straseni, Ialoveni, Hincești, Criuleni, Dubasari, Anenii Noi	1 regional landfill, including, MBT in Chisinau Municipality, 1 sorting station and 1 composting facility; 6 transfer stations.
Zone No. 5 – Ungheni, Nisporeni, Calarasi	1 regional landfill, including 1 sorting station and 1 composting facility; 2 transfer stations.
Zone No. 7 –mun. Balti, Drochia, Riscani, Glodeni, Floresti, Falesti, Falesti, Singerei, Soroca, Soldanesti, Rezina and Telenesti	1 regional landfill, including MBT in Bilicenii Noi locality, 1 sorting station and 1 composting facility; 5 transfer stations.
Zone No. 8 – Briceni, Ocnita, Edinet and Donduseni	1 regional landfill, including 1 composting station and 1 sorting station; 2 transfer stations.

Moldova proposes the following tentative implementation Roadmap:

Table 5. Tentative Roadmap for Implementation of Directive 1999/31/EC

Year	Actions/Milestones
2026-2027	● Amend Government Decision No. 939/2023 approving the Landfill Regulation in order to transpose Directive 1999/31/EC and Council Decision of 19 December 2002 establishing criteria and procedures for the acceptance of waste at landfills pursuant to Article 16 of and Annex II to the Directive 1999/31/EC. ● Set up a national planning instrument as part of a New Waste Management Programme for 2028-2032 for reducing biodegradable waste going to landfills. ● Adopt methodologies to establish rules for calculation, verification and reporting of data on waste and methods for verifying compliance with the targets. ● Revise the penalty system for non-compliance with EPR, by amending the Contraventional Code and Law on payment for environmental pollution, develop legal framework and methodology for application differentiated gate fees and raise landfill tax to promote and incentivise separate collection and recycling. ● Strengthen the capacities of the Environment Agency and the Environmental Protection Inspectorate by providing them specific training programmes in the field, as well as upgrading technological capacities. ● Conduct the national inventory of landfills and dumpsites. ● Approve a closing out plan for unmanaged/unauthorised landfills. ● Update the methodology for closing out unmanaged/unauthorised landfills. ● Develop and adopt the Biodegradable Waste Strategy.
Continuous	● Carry out information, awareness-raising, and public education campaigns on the need for proper and correct waste management. ● Develop annual inspection plans for the Environmental Inspectorate, including EPR compliance. ● Train inspectors on hazardous waste tracking, EPR audit procedures, and separate collection checks. ● Promote home and community composting. ● Enforce sorting, reporting, and delivery of commercial bio-waste to authorised facilities. ● Update and maintain the waste management reporting system www.siamd.gov.md ● Provide the necessary equipment for the Environment Agency and the Environmental Protection Inspectorate proper functioning (e.g. computers, sampling equipment, pollution measurement devices, drones). ● Develop guidelines and methodological instructions to support consistent enforcement and monitoring. ● Moldova will undertake a needs assessment for future re-planing in terms of institutional re-organisation of the Environmental Agency and Environmental Protection Inspectorate in order to strengthen the capacity for planning, organisation, implementation of an integrated waste management system at all levels (national and regional).
2027-2032	Creation of integrated waste management infrastructure in waste management zones 1, 2, 4, 5, 7 and 8, as follows: - WMZ 5 and 8 - end of 2028 - WMZ 1 - end of 2029 - WMZ 2 - end of 2032 - WMZ 4 and 7 - end of 2030

	Based on the results of the feasibility studies of the integrated management infrastructure sites, dumpsite and landfills, closure plan will be developed and approved.
2028-2034	Provisional closing out schedule: - WMZ 5 and 8 - 2029 - WMZ 1 - 2030-2031 - WMZ 2 - 2033-2034 - WMZ 4 and 7 - 2031-2032
2030-2045	Ensure monitoring and gradual attainment of the targets including: ● Monitoring and tracking the number and percentage of facilities compliant with the technical requirements of the Directive (e.g. leachate and gas collection system); ● Share of biodegradable waste diverted from landfill (compared to reference year); ● Number of environmental permits issued/renewed for waste management facilities, in accordance with harmonised legislation; ● Installed biological waste treatment capacity; ● Degree of coverage with separate waste collection services; ● Total quantity of biodegradable waste collected separately, expressed in tonnes/year; ● Number of non-compliant landfills closed or rehabilitated; ● Recycling rate of municipal waste (% by weight); ● Recycling/reuse rate of paper, metal, plastic, and glass (%); ● Recycling and recovery rate of construction and demolition waste (% by weight); ● Percentage of facilities compliant with recycling requirements; ● Number of inspections carried out and sanctions applied for non-compliance.

Table 6 below presents the state of play regarding landfills by locality in Moldova.

Table 6. Distribution of small, medium, and large landfills/dumpsites across localities in the Republic of Moldova, highlighting their number and, where applicable, the area occupied by the large landfills

No.	Name of locality	Small landfills / dumpsites	Average landfills/ dumpsites	Big landfills/dumpsites
1	Chisinau municipality		6	2 Stauceni commune- 4,8 ha, Ghidighici village- 4,0 ha.
2	Balti municipality		2	1 (Balti municipality-24,5 ha)
3	Cahul municipality	25	17	2 Andrusul de Sus commune- 3 ha, Cahul municipality- 8,9 ha

4	UTA Gagauzia	2	19	5 Comrat- 4,7 ha, Dezghinja village, Comrat- 3,1 ha, Ceadar Lunga municipality- 5,2172 ha, Tomai village, Ceadar Lunga municipality- 3 ha, Cazaclia village, Vulcănești- 4,4 ha.
5	Anenii Noi	15	7	1 (Tantareni commune- 24,6949 ha)
6	Basarabeasca		7	1 (Sadaclia village- 3,28 ha)
7	Briceni	9	13	5 Broceni- 4,2 ha, Lipcani- 5,0 ha, Corjauți village- 6 ha, Cotiujeni village- 3 ha, Slobozia Sireuti village- 3,3 ha
8	Cantemir	28	10	
9	Cimisia	18		
10	Criuleni	16	12	2 Boscana village- 13,6 ha, Criuleni- 3 ha
11	Calarasi	38	2	
12	Causeni	10	20	
13	Donduseni	22	15	1 (Donduşeni- 4,2 ha)
14	Drochia	9	22	1 (Cotova commune- 3,4 ha)
15	Dubasari	1	9	
16	Falesti	60	10	1 (Falesti- 7,8 ha)
17	Floresti	45	6	1 (Floresti- 3 ha)
18	Edinet	14	22	2 Edinet municipality- 4,65 ha, Goleni village- 3,05 ha
19	Glodeni		14	6 Glodeni- 5,4 ha, Iabloana village- 3,2 ha, Sturzovca village- 4 ha, Fundurii Vechi village- 3,4 ha, Dusmani village- 3,2 ha, Camenca village- 3,8 ha)
20	Hancesti	32	13	1 (Hancesti- 3,0 ha)
21	Ialoveni	10	16	1 (s. Costesti- 3,0 ha)
22	Leova	31	4	
23	Nisporeni	12	16	1 (Nisporeni- 4,65 ha)

24	Ocnita	2	18	1 (Grimauti- 3,1 ha)
25	Orhei	19	43	5 Orhei- 8,0 ha, Malaiesti village- 3,62 ha, Isacova village- 6 ha, Pelivan village- 4,0 ha, Cismea village- 3 ha
26	Rezina	35	1	
27	Rascani	17	25	1 (Costesti- 3,4 ha)
28	Stefan Voda	22	7	2 Carahasani village- 3,0 ha, Olanesti village- 5,1 ha
29	Sangerei	21	2	
30	Soroca	17	32	1 (Soroca-5,4 ha)
31	Straseni	10	12	2 Straseni- 4,7 ha, Cojusna village- 3,7 ha
32	Soldanesti	12	8	
33	Taraclia	3	15	
34	Telenesti	17	26	1 (Telenesti- 6,1 ha)
35	Ungheni	29	12	2 Ungheni- 9,0 ha, Alexeevca village- 3 ha
Total		601	474	49

Conclusion

The implementation of Directive 1999/31/EC represents one of the most capital-intensive and structurally complex reforms in the entire environment chapter. Moldova fully shares the EU's circular-economy, zero-pollution and landfill-reduction objectives, and sees alignment with the Landfill Directive as indispensable for health, environmental protection and the modernisation of local public services. However, the scale of the transformation required—closing more than 500 unmanaged landfills, building six regional sanitary landfills, establishing separate collection nationwide, and creating biological treatment capacity where none currently exists—cannot be achieved instantly or without a phased and heavily sequenced approach.

The requested transitional period is therefore not an attempt to delay obligations but a commitment to meeting them fully and sustainably. They reflect the real infrastructure timelines tied to already contracted EU-supported investments, the long lead times for construction, permitting and closing

of non-compliant landfills , and the need to expand institutional, monitoring and enforcement capacities to a level compatible with the acquis. Implementing the Directive without sufficient time would risk abrupt tariff increases, service disruption , and social resistance, undermining both compliance and public trust.

At the same time, the risks associated with a long transitional period are fully mitigated through legally binding intermediate targets, clear milestones up to 2045, strengthened data systems (SIAMD), inspection reforms,

In sum, the transitional period will enable Moldova to build a modern waste management system fully aligned with EU standards, protect public health and the environment, and deliver long-term, sustainable results.

6. Background Dossier for CHAPTER 27 - Environment and Climate Change

Request for Transitional Period for Implementation of Provisions of Directive 2012/19/EU of the European Parliament and of the Council of 4 July 2012 on waste electrical and electronic equipment (WEEE) (recast)

1. Introduction

Moldova reaffirms its firm commitment to advancing alignment with the EU environmental *acquis* and accelerating the transition to a circular and resource-efficient economy. Waste electrical and electronic equipment (WEEE) represents one of the fastest-growing waste streams in Europe and a key priority under the EU's Green Deal. Moldova views its integration into the WEEE framework not only as a legal obligation in the context of accession negotiations, but also as a strategic investment in public health, environmental protection, and sustainable economic development. Strengthening WEEE management is an integral part of Moldova's broader transformation towards EU standards, and the Government is determined to build the institutions, partnerships and infrastructure required for long-term compliance. At the same time, Moldova must ensure that the transition proceeds in a socially and economically sustainable manner, avoiding disproportionate burdens for households, municipalities, and small businesses.

In this context, Moldova requests a five-year transitional period for the implementation of Article 7 of Directive 2012/19/EU on waste electrical and electronic equipment concerning the achievement of the minimum collection rate of 65% of the average weight of electrical and electronic equipment (EEE) placed on the market in the three preceding years. This request reflects the structural constraints Moldova currently faces in establishing the comprehensive infrastructure required for meeting the Directive's ambitious targets. Collection systems remain at an early stage of development, and the country lacks key elements of a functional WEEE management chain, including fully operational extended producer responsibility (EPR) mechanisms, adequate collection networks, authorised treatment and dismantling facilities, and reliable systems for monitoring, reporting, and traceability of EEE/WEEE flows.

While Moldova has already taken significant steps to harmonise its legislation with Directive 2012/19/EU, the practical implementation of the WEEE *acquis* remains constrained by several systemic challenges. Municipalities still have insufficient capacity to establish and operate separate collection systems, and rural areas remain almost entirely uncovered by WEEE services. Cooperation between local public authorities and EPR schemes is still weak, limiting the development of civic amenity sites and coordinated collection mechanisms. At the same time, the Environment Agency and Environmental Protection Inspectorate require substantial reinforcement

of their technical expertise, digital infrastructure, and staffing levels in order to carry out EU-standard verification, inspection and enforcement functions.

Moldova also lacks domestic WEEE treatment and recycling facilities. As a result, most collected WEEE must be exported for treatment, primarily to Romania, increasing the cost and administrative complexity of compliance. Moreover, Moldova has no technologies currently in place for the safe handling and dismantling of specific categories of WEEE, such as refrigerants, screens, photovoltaic panels, or equipment containing hazardous components. The absence of such facilities represents a critical gap in the waste management chain and significantly limits the country's ability to meet reuse, recovery, and recycling targets.

The financial effort required to establish a nationwide WEEE system also exceeds the country's short-term absorption capacity. Investments estimated at EUR 7–8 million are needed to create collection infrastructure, develop traceability and reporting systems, acquire operational equipment, and build storage and dismantling capacities. Annual operational and maintenance costs—estimated at around EUR 1.5 million—will require a predictable and well-functioning EPR financing mechanism, which must be gradually consolidated and enforced.

Given these structural, institutional, financial, and technological limitations, meeting the Directive's requirements immediately upon accession would place a disproportionate burden on local authorities, producers, waste operators, and households. A carefully sequenced transition is therefore essential to ensure environmental effectiveness, economic feasibility, and social acceptability. Moldova is committed to using the transitional period to fully operationalise EPR systems, expand infrastructure, develop national WEEE databases, strengthen institutional capacity, and ensure that monitoring, reporting, and enforcement reach EU standards.

For these reasons, Moldova requests a transitional period until 31 December 2035 for the achievement of the collection target established under Article 7 of Directive 2012/19/EU. This period is necessary to complete the development of infrastructure, build institutional capacity, mobilise investments, and operationalise a sustainable and verifiable WEEE management system capable of meeting EU standards in a credible and durable manner.

2. Scope

The transitional period is requested for the following provision:

Article 7 - requires that from 2019 onward, the minimum collection rate must be 65% of the average weight of EEE placed on the market in the three preceding years. The article allows that by way of derogation from paragraph 1 of the Article 7, whereby Bulgaria, the Czech Republic, Latvia, Lithuania, Hungary, Malta, Poland, Romania, Slovenia and Slovakia may, because of their lack of the necessary infrastructure and their low level of EEE consumption, decide to:

b.) postpone the achievement of the collection rate referred to in the second subparagraph of paragraph 1 until a date of their own choice which shall not be later than 14 August 2021.

In this regard, Moldova requests a 5-year transitional period to postpone the achievement of the target for collection rate of WEEE as follows: to achieve by 31 December 2035 a collection of 65 percent of the average weight of EEE placed on the market in the three preceding years.

The provisions of the Directive for which a transitional period is requested apply to the following installations, activities and sectors below:

Installations and activities:

- Municipalities and Inter-municipal associations;
- Extended Producer Responsibility systems and producers;
- Producers, importers, distributors - Placing on the market of Electrical and Electronic Equipment (EEE);
- Treatment and dismantling facilities (depollution, disassembly, component/material recovery);
- Facilities for re-use, such as, repair, refurbishment centres (data on the number of facilities need to be established);
- Transboundary shipments of WEEE – export for treatment/recycling in line with Waste Shipment Regulation (WSR);
- Data collection and reporting systems – registers of producers, reporting of placed-on-market, collected and treated EPR waste flows.

Sectors targeted:

- Waste generators: households as the primary source of WEEE, commercial and institutional sectors generating waste streams similar to household waste (e.g., offices, schools, retail);
- Commercial sector: producers and importers of EEE, subject to registration, reporting, financing collection and treatment, distributors, obliged to offer take-back (1:1 or free collection for small WEEE);
- Waste management sector: municipal services, authorised WEEE management economic operators, producer responsibility organisations, authorised operators dismantling and depolluting WEEE, facilities preparing components for reuse, material recycling, energy recovery;
- Public authorities - municipalities, local public authorities, Environment Agency and Environment Protection Inspectorate – responsible for ensuring collection infrastructure, authorisations, and monitoring compliance.

3. Current state of play

3.1 Legal framework

Moldova has made important steps towards aligning the national legislative framework with the EU *acquis* in the field of waste electrical and electronic equipment. The main normative acts regulating this area are:

Law No. 209/2016 on waste which partially transposes the provisions of Directive 2012/19/EU on waste electrical and electronic equipment; and establishes the principles of extended producer responsibility, the obligations of authorities and economic operators.

Government Decision No. 212/2018 approving the Regulation on the management of waste electrical and electronic equipment which partially transposes Directive 2012/19/EU; and provides collection and recovery/reuse targets for WEEE.

The revised and significantly increased collection targets for WEEE (of the average weight of EEE placed on the market in the three preceding years) are presented in the Table 1 below, according to the adopted amendment to the Government Decision No. 212/2018 in September 2025.

Table 1. Collection targets for WEEE

Year	Annual collection rate, %
for 2026	40
for 2027	45
for 2028	45
for 2029	50
for 2030	50

Table 2. Targets applied before the September 2025 amendments

Year	Annual collection rate, %
for 2020	5
for 2021	10
for 2022	15
for 2023	20
for 2024	25

for 2025	30
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The recovery and reuse targets are similar to the targets provided in the Annex V of the Directive 2012/19/EU.

The amendments to the WEEE Regulation included the following:

- provision of 6 categories of WEEE instead of 10 and include indicative list of EEE under EPR with the CN codes, and update the minimum recovery targets;
- clear distinction between equipment imported for commercial purposes and for own use, and clarified the definition of producer;
- revision of the WEEE collection targets until 2030;
- inclusion of transitional provisions on photovoltaic panels;
- inclusion of provisions on operational cost for EEE management;
- elaborated the methodology for the calculation of the weight of electrical and electronic equipment (EEE) placed on the market and of the quantity of waste electrical and electronic equipment (WEEE) generated by weight.

3.2. Institutional framework

There is a currently a lack of clear methodical guidelines for the Environment Agency and the business sector concerning the rules for the calculation, verification and data reporting, the establishment of data formats for waste electrical and electronic equipment (WEEE), the registration and reporting procedures for producers of electrical and electronic equipment, and the improvement of the return rate for used and waste mobile phones, tablets and laptops, all of the above in accordance with relevant EU decisions and guidelines.

It is also necessary to approve guidelines for checking the operational and financial report provided by EPR schemes.

In Moldova, the competences regarding the management of waste electrical and electronic equipment (WEEE) are divided between several central and local public institutions, as follows:

The **Ministry of Environment** is the central authority responsible for developing public policies, harmonising national legislation with the EU *acquis* and general monitoring of the field.

The **Environment Agency** is responsible for assessing and reporting data on WEEE, managing the register of producers and authorising economic operators in the field.

The **Environmental Protection Inspectorate** is responsible for controlling, inspecting and applying sanctions for non-compliance with the requirements regarding the collection and management of WEEE.

The **Local public authorities** are involved in organising collection points, civic amenity sites, development of complementary collection systems for EPR products, informing the population and collaborating with authorised operators and EPR schemes.

3.2.1. Administrative capacity gaps

- Limited experience in implementing the EU standards and issuing permits;
- Insufficient capacity at the Environmental Agency to monitor, oversee the implementation of Extended Producer Responsibility (EPR) schemes;
- Insufficient cooperation between municipalities and EPR schemes, which hampers the establishment of efficient collection points for waste.

4. Implementation status

The WEEE Regulation has been applicable since 2019, but reporting requirements applying since 2021 for the 2020 collection targets. Nevertheless, the overall level of compliance by producers remained very limited at that time. Consequently, in 2024, the Law No. 209/2016 on waste was amended to stipulate that importers of packaged products and packaging materials shall not be permitted to place such goods on the market unless duly registered in the official List of Producers subject to Extended Producer Responsibility. This amendment established a binding obligation for importers to ensure registration in the system and to fulfil their EPR obligations, either through participation in a collective compliance scheme or by establishing an individual scheme. The compliance level increased significantly as outlined in Table 3 below on evolution of the number of economic operators registered in the list of EEE producers.

Table 3. Evolution of the Number of Registered EEE Producers by Type of Compliance Scheme (2021–2025)

	2021	2022	2023	2024	2025	Total
Collectively	1	26	54	760	1229	2069
Individually				1	2	3
Total	1	26	54	761	1231	2072

Source: Environment Agency

The EEE and WEEE indicators per capita are presented in the Table 4 below.

Table 4. EEE and WEEE indicators per capita (2012-2019)

	2012	2013	2014	2015	2016	2017	2018	2019
EEE placed on the market (tonnes)	21964.8	21464.8	23492.3	17775.9	19018.9	23076.4	26720.2	30298.6
WEEE generated (tonnes)	9367	10610	11855	12959	13962	15054	16198	17393
EEE per capita, kg/year, Moldova	7,28	7,29	8,19	6,25	6,73	8,30	9,79	11,30
WEEE per capita/kg/year, Moldova	3,1	3,6	4,1	4,5	4,9	5,4	5,9	6,4

Source: Calculation tool EEE Put on Market Instrument and WEEE generated (UNU ViE SCUCLE)

Currently, the WEEE collection is based on selective collecting of the whole or component parts of the WEEE that generate higher revenues, mostly from institutional and commercial sectors. In Moldova, there are no recycling companies yet, and there is one that intends to establish a dismantling facility.

So far, the collection targets have been achieved. However, meeting the recovery and reuse targets remains challenging, as treatment capacities are lacking in the country and WEEE must be exported to neighbouring countries, most frequently to Romania. Although EPR schemes report compliance with recovery targets, the reported data require further verification and independent audit to ensure their credibility.

5. Justification for the transitional period

Moldova's request for a transitional period for the implementation of Article 7 of Directive 2012/19/EU is grounded in structural, technical, and financial constraints that prevent the immediate attainment of the 65% WEEE collection rate. While past enlargements show that transitional periods were typically shorter, the circumstances facing Moldova are materially more challenging. Moldova begins accession from a significantly lower baseline in terms of infrastructure, administrative capacity, per capita EEE consumption, and the maturity of Extended Producer Responsibility (EPR) systems. Moldova's request is therefore proportionate to its starting point and reflects the minimum feasible timeframe for ensuring credible, irreversible compliance without compromising the functioning of the Internal Market.

Moldova's request for the transitional period to achieve the Directive's requirements after accession, takes into consideration the following challenges:

Entity	Description / Roles	Challenges
Local Public Authorities	Plan and organise the public waste collection service in the locality in accordance with Law No. 209/2016 on waste, in particular implementation of waste hierarchy, establishment of separate collection, transport, recovery, and final disposal of waste, allocate designated sites for the separate collection of different municipal waste streams and as well as for a complementary collection system for EPR products, as well as development of the local waste management programs as well as for the regional cooperation.	- Limited coverage with waste collection services, especially in rural areas - Poor separate collection infrastructure for recyclables - No established civic amenity sites - Limited capacity to develop/ implement waste management programmes. - Poor cooperation with EPR schemes - Weak systems for the gate fees on landfills, no differentiated gate fees for disposal of recyclable and non-recyclable wastes, along with reduced landfill tax.
Extended Producer Responsibility (EPR) Schemes and Producers	Collective and individual compliance schemes, producers and importers subject to EPR obligations (packaging, WEEE, batteries, end-of-life vehicles, oils, tyres, textiles), which have to establish and co-finance collection and treatment in cooperation with the municipalities (for packaging, WEEE, batteries).	- Incomplete coverage of obligated producers - Insufficient financing and investments in collection infrastructure provided by schemes - Poor establishment of collection points
Waste generators - citizens/ households and economic entities	Generators of municipal waste are obliged to participate in separate collection and bear, through tariffs or fees, a share of the costs for improved waste services.	- Many households are also reluctant to discard old EEE, often keeping them at home instead of delivering them for proper collection and treatment - Poor reporting on behalf of the private sector.

The transitional period is requested due to the following considerations: At present, Moldova faces structural constraints that limit the immediate attainment of the required collection rate, including the insufficient nationwide collection infrastructure, lack of new technologies for WEEE classification and treatment (e.g., dismantling of refrigerators or solar panels) and limited traceability and monitoring systems for EEE and WEEE flows. Public authorities and extended producer responsibility schemes are actively advancing compliance mechanisms; however, both require additional time to consolidate cooperation, enhance reporting accuracy, and ensure adequate financing for the expansion of collection points and civic amenity

sites. Similarly, the Environment Agency and Environmental Protection Inspectorate requires further human and technical capacities to supervise EPR compliance, enforce reporting obligations, and implement EU-standard verification and control functions.

Moreover, the financial investments involved pose as well a constraint on the ability to fully implement the Directive 2012/19/EU before accession. The costs for the establishment of the national infrastructure for WEEE collection are estimated at approximately EUR 7–8 million:

- Establishment of fixed and mobile collection points (special containers, storage spaces).
- IT systems and databases for traceability and reporting.
- Equipment for inspection and collection staff: ~EUR 500,000.

Operational and maintenance costs (annual, estimated):

- Operation of collection centres and transport of WEEE: ~EUR 1.2M/year
- IT maintenance, technical staff and continuous training: ~EUR 300,000/year

These financial needs must be accommodated within Moldova's limited municipal budgets and emerging EPR systems. Premature enforcement of the 65% target risks underfunding essential services, creating non-compliance, and undermining trust in the system. Progressive implementation allows Moldova to leverage EU pre-accession instruments and IFI support for targeted investment in infrastructure, monitoring, and capacity building.

Moreover, while the establishment of basic IT infrastructure is feasible before accession, the core difficulty lies not in IT creation itself but in the deployment of a fully functional, EU-compliant traceability and reporting system. Moldova needs time to:

- integrate producer registration, customs controls, and waste flow reporting into a single interoperable platform;
- verify and audit declarations from registered producers/importers, many of whom currently have low reporting accuracy;
- introduce data-verification functions, mass-balance controls, and cross-checks that align with EU guidance and standard WEEE reporting methodologies.

The current Environment Agency lacks the specialised staff required to implement real-time monitoring, detect under-reporting or free-riding, and verify treatment/recycling performance. Comprehensive training, IT upgrades, and new auditing functions must first be operational before a 65 percent target is enforceable. This is also necessary to prevent distortions in the internal market by ensuring that all producers bear their full EPR obligations.

Lastly, a EU-compliant WEEE treatment capacity and dependence on cross-border shipment is currently missing. While the absence of domestic treatment installations is not unique to Moldova, the country faces a double dependency: it must both establish national pre-treatment/dismantling capacity and secure stable long-term contracts for exporting WEEE to authorised facilities

abroad—primarily in Romania. Moldova currently has no certified EU-compliant dismantling facilities, minimal depollution capacity, and no operational lines for complex waste streams such as cooling appliances, IT equipment, or photovoltaic panels. Although non-EU countries apply WEEE standards, Moldova lacks the investment base, technical workforce, and market size to establish compliant facilities before accession. Export-based models are feasible, but they must be supported by a functioning EPR and traceability system, which is still nascent. This makes achieving the 65% target before 2035 structurally unrealistic.

6. Risk Analysis

Moldova's capacity to meet the requirements of Article 7 of Directive 2012/19/EU must be assessed against a realistic analysis of systemic, operational, and financial risks. Without a transitional period, these risks would jeopardise compliance, undermine environmental outcomes, and create disproportionate economic and social burdens—contrary to the principles of good faith implementation and to the EU's own enlargement methodology, which emphasises credible, sustainable alignment.

A first core risk is **insufficient national collection infrastructure**, particularly in rural and peri-urban areas where over 60 percent of the population resides. Moldova currently lacks both fixed and mobile WEEE collection points, functional civic amenity sites, and specialised storage facilities for hazardous WEEE categories. Without a phased build-up supported by EU and IFI investment, the country risks a rapid escalation of illegal disposal, informal dismantling, and uncontrolled cross-border shipments—each with significant environmental and public-health consequences. These risks are further exacerbated by Moldova's limited capacity to enforce producer responsibility, monitor waste flows and verify compliance data. Immediate application of the 65 percent target would therefore create an implementation gap impossible to bridge with existing tools.

A second major risk concerns **institutional capacity and enforcement systems**. The Environment Agency and Environmental Protection Inspectorate lack the specialised staff, training, and operational procedures required to carry out EU-compliant supervision of Extended Producer Responsibility (EPR) schemes, audit producer data, verify placed-on-market quantities, and enforce penalties. The absence of mature IT systems for traceability and reporting significantly increases the risk of data inaccuracies, under-reporting of EEE placed on the market, and insufficient control over EPR schemes. These shortcomings could compromise Moldova's ability to ensure transparency, prevent free-riding, and maintain fair competition among producers, thereby distorting the functioning of the internal market after accession.

The third critical risk is **financial sustainability**. The estimated EUR 7–8 million required for nationwide collection infrastructure, along with recurrent operational costs of EUR 1.5 million per year, exceed Moldova's short-term public-budget capacity. Immediate implementation would

likely require cost-recovery through fees charged to producers, importers, and ultimately consumers, creating inflationary pressures and distortions in the yet-nascent formal collection market. Without phased investments and external financing, EPR schemes risk becoming financially unviable, and municipalities would be unable to perform their statutory obligations to organise separate collection systems.

These risks directly justify a gradual transition supported by EU financial instruments. By linking WEEE infrastructure development to EU instruments, Moldova can address its capacity gaps, reduce fiscal pressure on national authorities, and ensure that the collection and treatment systems being built are fully interoperable with EU circular-economy value chains. The transitional period therefore enables Moldova to synchronise legislative alignment with financial absorption capacity and sequencing of investments—ensuring compliance is not only legally correct, but operationally feasible and economically sustainable.

Without such a phased approach, Moldova would face high levels of environmental non-compliance, systemic pressure on EPR schemes, distortions in the internal market, and increased risk of infringement procedures immediately after accession. A well-sequenced, EU-supported transition is therefore the only credible pathway to achieving the Directive’s 65% collection target and ensuring Moldova’s full integration into the EU’s circular economy framework.

7. Tentative Roadmap for implementation of Directive 2012/19/EU

Moldova proposes the following implementation roadmap:

Year	Actions/Milestones
2026-2027	• Adopt amendments to Government Decision No. 212/2018 approving the Regulation on the management of waste electrical and electronic equipment in order to transpose Directive 2012/19/EU. • Develop and approve the methodologies, guidelines and implementing documents to support the implementation of the WEEE Regulation (mostly by aligning with the relevant decision of the EC). • Revise the penalty system for non-compliance with EPR, by amending the Contraventional Code and Law on payment for environmental pollution. • Approve guidelines for checking the operational and financial report provided by EPR schemes. • Strengthen the capacities of the Environment Agency and Environment Protection Inspectorate by strengthening human resources and skills (targeted training programmes in the field of EPR compliance), upgrading technological capabilities. • Develop capacity with the Environmental Agency to implement coordination mechanism for EPR supervision and enforcement. • Adopt amendments to Government Decision No. 682/2018 on the approval of the Concept of the Automated Information System "Waste Management" to ensure

	better monitoring and traceability. ● Upgrade the SIA MD automated information system for waste management.
Continuous	● Carry out annual campaigns to inform and educate the public on proper management of WEEE, take back options. ● Organise training programmes and workshops to educate producers and importers on compliance with regulations and reporting obligations. ● Organise training programmes and technical assistance for municipalities. ● Equip the Environmental Agency and the Environmental Protection Inspectorate with the necessary equipment (e.g., sampling equipment, pollution measurement equipment, etc.). ● Conduct continuous trainings for the Environmental Agency staff to ensure evaluation of operational and financial plans prior to authorisation.
2027-2032	Creation of integrated waste management infrastructure in waste management zones 1, 2, 4, 5, 7 and 8, which will allow the following: - Strengthening the cooperation between the regional waste management operator and the EPR schemes; - Extending current separate waste collection networks in all urban and rural areas; - Creation of the civic amenity sites for collection of WEE, among other types of waste.
2030-2035	Ensure monitoring and gradual attainment of the targets as set out in legislation including: - Tracking and developing an annual report on the percentage of WEEE collected compared to the average quantity of EEE placed on the market; - Record and develop an annual report on the quantities of WEEE collected separately by the six categories established under EU legislation; - Tracking and developing an annual report on the percentage of WEEE prepared for reuse, recycled, and recovered, ensuring progress towards national and EU targets; - Collect and verify data on quantities of WEEE exported for treatment and their final destinations, in line with transboundary shipment requirements. ● Ensure compliance by monitoring and the number of producers registered in the national register. ● Track and develop annual reports on the number of producers complying with EPR obligations. ● Conduct periodical surveys to assess the number and challenges of households participating in WEEE separate collection.

Conclusion

Moldova's request for a five-year transitional period for the implementation of Article 7 of Directive 2012/19/EU reflects a clear and evidence-based assessment of the country's current infrastructural, institutional and financial limitations, and its commitment to achieving full compliance in a controlled, sustainable and verifiable manner. While the legislative framework is

already broadly aligned with the Directive, the practical requirements for attaining the 65 percent WEEE collection rate exceed Moldova's current operational capacity. Collection and storage infrastructure remains insufficient, treatment facilities are absent, and the systems required to ensure traceability, reporting quality and data integrity are not yet fully established. Without a phased implementation, these gaps would risk immediate and systemic non-compliance from the date of accession.

At the institutional level, both the Environment Agency and the Environmental Protection Inspectorate require substantial reinforcement of human and technical resources to perform the full spectrum of EU-standard compliance tasks, including registration and verification of producers, supervision of EPR schemes, quality control of reported data and enforcement actions in cases of non-compliance. Local public authorities also face structural constraints linked to limited operational capacity, weak coordination mechanisms and insufficient coverage of separate collection systems—factors that undermine the effective deployment of EPR obligations at municipal level. A transitional period will allow the consolidation of municipal-EPR cooperation, the establishment of civic amenity sites, and the development of uniform operating practices nationwide.

Financial constraints further justify the request. Moldova must mobilise an estimated EUR 7–8 million in initial investment and approximately EUR 1.5 million in annual operational expenditure to create a functional WEEE collection and reporting system. These investment needs are particularly significant given that Moldova is simultaneously undertaking major reforms across the waste, water, climate and energy sectors. The transitional period will allow Moldova to sequence reforms, avoid disproportionate fiscal pressure on households and businesses, and progressively absorb EU financial assistance, and other relevant funding mechanisms.

Granting Moldova a five-year transitional period will therefore ensure a realistic, fiscally responsible and institutionally coherent pathway to full alignment with Directive 2012/19/EU. This approach mitigates the risk of structural non-compliance, strengthens the credibility of producer responsibility schemes, and allows the country to build durable collection and recycling systems that will remain effective beyond accession. The request is limited in time and scope, proportionate to the challenges identified, and fully consistent with the precedents granted to several Member States whose WEEE systems required phased development.

Moldova remains firmly committed to achieving full compliance with the Directive within the transitional period. The Government will continue to advance regulatory alignment, mobilise investment in infrastructure, strengthen institutional capacity, and ensure that the principles of the circular economy are embedded in national waste management practices. The transitional period will allow Moldova not only to meet EU targets but also to establish a modern, transparent and efficient WEEE management system that supports environmental protection, fosters green economic development, and contributes to the integrity of the EU Internal Market.

7. Background Dossier for CHAPTER 27 - Environment and Climate Change

Request for Transitional Period for Implementation of Provisions of Directive (EU) 2019/904 of the European Parliament and of the Council of 5 June 2019 on the reduction of the impact of certain plastic products on the environment

1. Introduction

Moldova requests a transitional period of 5 years after accession to the EU for the application of Article 4, 6 (5), and 9 of Directive (EU) 2019/904 of the European Parliament and of the Council of 5 June 2019 on the reduction of the impact of certain plastic products on the environment.

The transitional period is requested for the following provisions:

- **Article 4** Consumption reduction
- **Article 6 (5)** Product requirements
- **Article 9** Separate collection

The transitional period is requested to develop necessary infrastructure and ensure full implementation of the EPR system for all packaging types.

Article 4 requires that Member States, take the necessary measures to achieve an ambitious and sustained reduction in the consumption of the single-use plastic products listed in Part A of the Annex, in line with the overall objectives of the Union's waste policy, in particular waste prevention, leading to a substantial reversal of increasing consumption trends. Moldova requests a transitional period of 5 years for Article 4. Moldova will take the necessary measures to achieve a measurable quantitative reduction in the consumption of the single-use plastic products listed in Part A of the Annex on the territory of Moldova by 2035.

Article 6, paragraph 5 requires Member States to ensure that beverage bottles listed in Part F of the Annex:

- (a) from 2025, beverage bottles listed in Part F of the Annex which are manufactured from polyethylene terephthalate as the major component ('PET bottles') contain at least 25 % recycled plastic, calculated as an average for all PET bottles placed on the market on the territory of that Member State; and
- (b) from 2030, beverage bottles listed in Part F of the Annex contain at least 30 % recycled plastic, calculated as an average for all such beverage bottles placed on the market on the territory of that Member State.

Moldova requests a transitional period of 5 years for Article 6 (5) and will ensure the following:

- a) By the date of accession, beverage bottles listed in Part F of the Annex which are manufactured from polyethylene terephthalate as the major component ('PET bottles')

contain at least 25 % recycled plastic, calculated as an average for all PET bottles placed on the market; and

- b) By 31 December 2035, beverage bottles listed in Part F of the Annex contain at least 30 % recycled plastic, calculated as an average for all such beverage bottles placed on the market.

Article 9 requires Member States to take the necessary measures to ensure the separate collection for recycling of the 90 % of waste single-use plastic products listed in Part F of the Annex. Moldova requests a transitional period of 5 years for Article 9 and intends to reach the final target of 90% according with the following intermediate targets:

- 1) by the date of accession: 80 % by weight;
- 2) by 31 December 2031: 82 % by weight;
- 3) by 31 December 2032: 84% by weight;
- 4) by 31 December 2033: 86 % by weight;
- 5) by 31 December 2034: 88% by weight;
- 6) by 31 December 2035: 90 % by weight.

2. Scope

The provisions of the Directive for which a transitional period is requested apply to the following installations, activities and sectors below:

Installations and Activities:

- Extended Producer Responsibility (EPR) schemes for plastic packaging;
- Deposit Refund System Administrator for single use plastic beverage bottles with a capacity of up to three litres;
- Producers and importers placing single use plastic products on the market in Moldova;
- Retail and distribution activities – supermarkets, shops, HoReCa suppliers distributing Single-Use Plastics (SUP);
- Municipal waste collection operators, responsible for the collection and transport of separately collected plastic waste;
- Installations and operators for recycling, preparation for re-use, and recovery of single use plastic and municipal waste.

Sectors Targeted:

- Manufacturing and Import Sector – producers/importers of single-use plastic products and packaging;
- Retail and Distribution Sector – supermarkets, shops, wholesalers, HoReCa suppliers;
- Hospitality, Restaurants, Cafés, Catering (HoReCa) – high consumers of SUP (cups, food containers, cutlery, straws, plates);
- Beverage and Bottled Water Industry – subject to design requirements (tethered caps, recycled content) and separate collection targets;

- Waste Management Sector – operators of collection systems, recyclers, recovery facilities;
- Municipalities and local public authorities – responsible for awareness, clean-up, collection infrastructure;
- Households and households-like producers – primary generators of municipal and single use plastic waste;
- Commercial and institutional sectors – generating packaging waste similar in nature to household waste.

3. Current State of Play

3.1. Legal Framework

The main normative acts regulating this area are:

Law No. 209/2016 on waste:

- Waste prevention is the general principle included as a priority in Law No. 209/2016;
- Extended Producer Responsibility (EPR) – introduced for packaging, WEEE, batteries, oils, vehicles; producers/importers have obligations for collection and recovery;
- Separate collection – mandatory for municipalities; plastic, glass, metals and paper must be collected separately; specific collection schemes for packaging, WEEE, and batteries;
- Bans on certain single-use plastic items – e.g. plastic carrier bags, single-use plastic tableware (cups, plates, cutlery) prohibited through national legislation;
- Deposit-return scheme – implemented for beverage packaging (plastic, glass, metal), with financial contribution and reporting obligations for producers;
- Market restrictions – prohibition to place on the market products covered by EPR if producers are not registered;
- Cooperation between municipalities and collective EPR schemes – local public authorities are obliged to provide access to collection points and collaborate with producer responsibility organisations;
- Sanctions and enforcement – penalties for non-compliance, including for unregistered producers or improper waste management practices.

Government Decision No. 561/2020 on the approval of the Regulation on packaging and packaging waste:

- partially transposes the requirements for the prevention, reuse, recycling and recovery of packaging;
- provides for recycling targets, labelling requirements and rules for placing on the market of packaging.

Government Decision No. 379/2025 on establishment of the Deposit Refund System:

- establishes the mechanism for the creation and operation at national level of the Deposit Refund System (DRS), unique and applicable to reusable and single-use packaging for which a deposit has been established. The following beverage is subject to DRS: beer, beer cocktails, cider, wine cocktails, wine drinks, other fermented beverages, alcoholic cocktails and non-alcoholic beverages (soft drinks, table water), natural mineral water, spring water, drinking water, juice, nectar, packaged in single-use glass, plastic or metal packaging, with a volume of at least 0.1 liters and up to and including 3 liters.

Law No. 231/2010 on internal trade: Article 201 prohibits several single use plastic products, with the exception of biodegradable ones, as follows:

- The use/sale of portable plastic bags, with or without handles, with a thickness of 50 microns or more, provided to consumers at points of sale of goods, is prohibited from 1 January 2019;
- The use/sale of thin plastic bags less than 50 microns thick, except for those used as packaging, is prohibited from 1 January 2020;
- The use/sale of very thin plastic bags less than 15 microns thick, except for packaging, is prohibited from 1 January 2021;
- The use/sale of disposable plastic plates, glasses, other cutlery, and chopsticks, except biodegradable ones, is prohibited from 1 January 2021.

Identified gaps:

- The national legislation is partially aligned with the Directive (EU) 2019/904. Other missing elements are: specific recycled plastic content targets for PET bottles, detailed consumption reduction measures for some product categories (straws, stirrers, food containers, etc.) beyond bans, requirements towards the caps and lids to remain attached to the containers, prohibitions for placing on the market of the single-use plastic products listed in Part B, requirement to bear a conspicuous, clearly legible and indelible marking, measures to inform consumers and to incentivise responsible consumer behaviour.
- Guiding documents and instructions are missing.

3.2. Institutional framework

The **Ministry of Environment** is responsible for developing policy documents and draft legislation in the field of waste management and contaminated sites, coordination of implementation of waste management activities at the national level and monitoring of the status of Waste management programme implementation.

The **Environment Agency** is responsible for data collection, technical analysis, and the preparation of annual reports related to waste management and the implementation of Directive 2008/98/EC. The agency also contributes to national reporting obligations under EU and international environmental frameworks.

The **Environmental Protection Inspectorate** is responsible for monitoring compliance of waste management installations and facilities. This includes conducting regular inspections, enforcement activities, and applying sanctions or corrective measures, where non-compliance with environmental legislation is identified.

Local Public Authorities are responsible for planning and organising the public waste collection service in the locality in a way that ensures the application of the Law No. 209/2016 on waste, in particular implementation of waste hierarchy, establishment of separate collection, transport, recovery, and final disposal of waste, allocate designated sites for the separate collection of different municipal waste streams and as well as for a complementary collection system for EPR products, creation of civic amenity sites, as well as development of the local waste management programmes as well as for the regional cooperation.

Administrative capacity gaps:

- Incomplete institutional structures or insufficient staff in permitting, monitoring, and enforcement authorities;
- Limited experience in implementing the EU standards;
- Insufficient capacity at the Environmental Agency to implement or act as a coordination mechanism with the necessary competencies and responsibilities to oversee the implementation of Extended Producer Responsibility (EPR) schemes;
- The online waste management reporting system (SIAMD) requires continuous updating and maintenance. However, the availability of financial resources to ensure its proper functioning is limited;
- There is insufficient cooperation between municipalities and EPR schemes, which hampers the establishment of efficient collection points for waste.

3.3. Implementation status

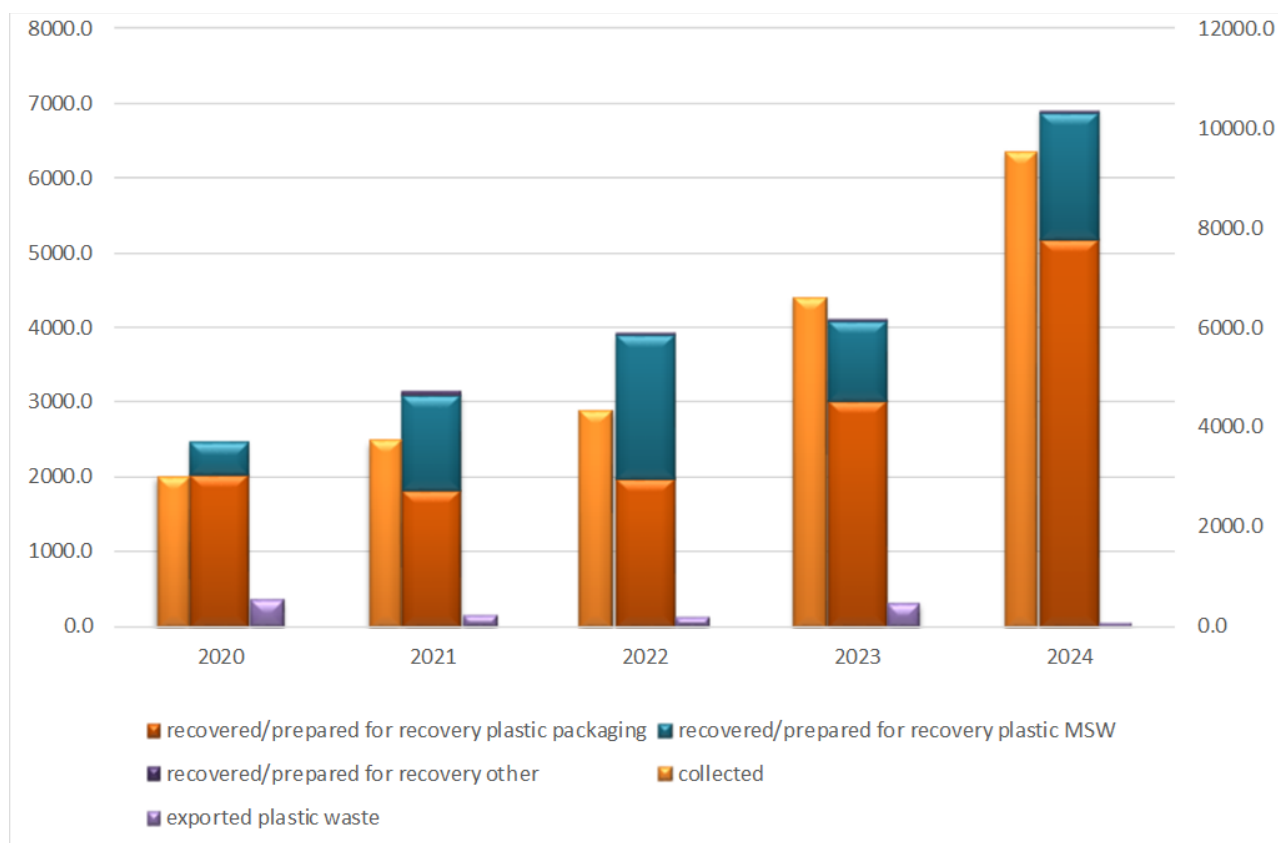
The Packaging Regulation has been applicable since 2021. There are 8 EPR collective systems and 35 individual systems for packaging and packaging waste (about 6386 producers/importers).

The DRS producers and retailers are now in process of association and creation of DRS Administrator. The system is planned to become operational at the beginning of 2027.

The number of authorised SUP related waste managers (collection, sorting or other forms of preparation for recovery) is about 20.

Figure 1 below contains data on quantities of plastic waste collected, recovered and prepared for recovery, including quantity exported in tonnes.

Figure 1. Quantities of Plastic Waste Collected, Recovered, Prepared for Recovery, and Exported (Tonnes)



Source: Environment Agency

Table 1 below reflects the % of the plastic waste collection and recovery and preparation for recovery targets achieved over the last 5 years

Table 1. Waste Collection and Recovery/Preparation for Recovery Targets

	2020	2021	2022	2023	2024
% collection rate	3.73	4.62	5.44	8.33	12.15
% recovery rate	3.72	4.15	5.13	5.75	8.83
% preparation for recovery	3.06	3.88	4.90	5.18	8.76

3.3.1. Challenges

Moldova faces several challenges in meeting the Directive's requirements before accession.

- The collection coverage for municipal solid waste (MSW) currently covers around 85 percent of urban population and less than 30 percent in rural areas, according to the National Programme on Waste Management or above 55 percent of total population.
- Separate collection of waste exists in some districts of Chisinau Municipality and in a few other towns and communities, where municipal waste is collected in separate containers intended for collection of different types of waste (glass, paper, plastic/PET and cans).
- Insufficient cooperation between municipalities and EPR schemes, which hampers the establishment of efficient collection points for waste.
- Treatment and pre-treatment for waste are limited and require significant investment to enhance recycling efficiency and meet future demands.
- Poor investments of EPR schemes for EPR waste collection infrastructure from household users, such as packaging, WEEE and batteries. So, the collection targets are achieved by EPR schemes only based on waste collected from commercial/institutional sectors.
- Low level of awareness among consumers and economic operators.

Table 2. List of entities subject to Directive (EU) 2019/904 and challenges in implementation

Entity	Description / Roles	Challenges
Local Public Authorities (LPAs)	Plan and organise municipal waste collection services in line with Law No. 209/2016 on Waste; ensure separate collection of municipal waste streams including packaging and SUP products; provide sites for selective collection and complementary systems for EPR products; cooperate with regional structures; develop local/regional waste management programmes.	- Limited coverage of waste collection services, especially rural areas. - Poor infrastructure for separate collection of recyclables and SUP items. - Weak integration of SUP obligations in local waste management programmes. - Poor cooperation with EPR schemes (packaging, WEEE, SUP).
Waste Collection Operators	Provide collection, transport, and disposal services, authorised under Law No. 209/2016; must ensure separate collection of SUP-related waste streams in cooperation with municipalities and EPR schemes.	- Insufficient technical capacity for separate collection (containers, vehicles, logistics); - Continued collection of mixed waste with SUP items disposed of in non-compliant landfills.
Waste Management Operators (Recyclers,	Authorised operators for collection, recycling, and recovery of paper, glass, plastics, metals, packaging, and SUP items.	- Low recycling performance, particularly for SUP plastic items; - Limited treatment capacity for SUP and packaging fractions; - Weak domestic market for secondary

Recovery Facilities)		raw materials (high reliance on export).
Extended Producer Responsibility (EPR) Schemes & Producers	Collective/individual schemes and producers/importers obligated under EPR (packaging, WEEE, batteries, ELVs, oils, tyres, textiles, SUP items) must finance and ensure collection/treatment; cooperate with municipalities and ensure achievement of targets (collection, recycling, litter reduction).	- Incomplete coverage of obligated producers - Insufficient enforcement and monitoring of EPR schemes by Environment Agency and Inspectorate; - Insufficient financial contributions for infrastructure (bins, collection points, awareness campaigns); - Poor cooperation with municipalities in establishing collection systems; - Underachievement of EU collection and recycling targets for SUP products.
Producers of Single-Use Plastics (SUP)	Producers and importers placing SUP products on the market (packaging, beverage containers, lightweight plastic carrier bags, cups, food containers, cutlery, straws, balloons, sanitary items, tobacco filters, wet wipes).	- Incomplete coverage of obligated producers; - Insufficient enforcement of producer registration and reporting obligations; - Limited substitution and eco-design measures; - Weak incentives for alternatives (biodegradable, reusable, or recyclable designs); - Weak consumer engagement, producers' awareness campaigns minimal or absent.
Waste Generators (Households, Citizens, Economic Entities)	Generators of municipal waste are obliged to participate in separate collection and pay fees/tariffs; expected to reduce consumption of SUP products, ensure proper disposal, and participate in deposit-return or take-back schemes (once established).	- High consumption of SUP items (bags, cutlery, straws, cups, bottles); - Low participation in recycling schemes.

4. Justification for the transitional period

The requested period is essential to enable the phased establishment of the national infrastructure and operational mechanisms required for the Directive's effective enforcement, including the

Extended Producer Responsibility (EPR) system, Deposit-Return System (DRS), and the achievement of the prescribed separate collection and recycled content targets.

Current waste management indicators demonstrate a substantial implementation gap relative to EU requirements. The national municipal waste recycling rate remains at 10–12% (2024 data), compared to the 50% target established for EU Member States by 2030. Disaggregated recycling data indicate 4–6% for paper, 3–4% for plastics, and 30–42% for glass, of which approximately 75% is imported. Separate collection systems cover less than 55% of the population, with rural coverage below 30%. Under these conditions, immediate compliance with the Directive’s provisions—particularly Article 4 (consumption reduction), Article 6(5) (product design and recycled content), and Article 9 (separate collection)—would not be technically or financially achievable within the short term.

The EPR system for packaging, including plastics, is functional but remains underdeveloped in terms of coverage, compliance, and enforcement. According to the Environmental Agency, EPR schemes achieved only 25–45% of their annual collection targets in 2023. Limited cooperation between producers, importers, and local public authorities constrains the establishment of efficient separate collection networks. Moreover, the Environmental Agency and the Environmental Protection Inspectorate currently lack sufficient human resources, technical capacity, and IT infrastructure to monitor, verify, and enforce EPR obligations in accordance with EU standards. The operationalisation of a comprehensive EPR oversight and reporting mechanism will therefore require a transitional phase for institutional strengthening and system calibration.

Significant infrastructure investments are also required to ensure compliance with the Directive’s product and collection requirements. The national Deposit-Return System (DRS) for beverage packaging, established under Government Decision No. 379/2025, is in the preparatory phase, with operationalisation foreseen for early 2027. The DRS implementation requires an estimated EUR 20 million in private sector investment for IT systems, logistics, and collection infrastructure. In parallel, the Moldova Solid Waste Project—co-financed by EBRD, EIB, and EPR schemes—will finance the development of regional waste management zones and separate collection infrastructure between 2026 and 2032. These projects collectively represent the backbone of Moldova’s compliance pathway and cannot be accelerated without compromising technical soundness and financial viability.

Socio-economic and behavioural factors further justify the need for a transitional period. Awareness and participation in separate collection remain limited, while the consumption of single-use plastic products continues to be high. Full implementation of the Directive requires extensive awareness-raising, behavioural change programmes, and the introduction of economic instruments such as pay-as-you-throw schemes. Immediate transposition without a transitional period could generate disproportionate financial impacts on producers—particularly SMEs—due to design and recyclability requirements, and increase consumer prices through cost pass-through.

mechanisms. A phased implementation will mitigate affordability risks for vulnerable households and allow sufficient time for producers and retailers to adapt product design and packaging practices.

From a technical and logistical perspective, Moldova's recycling and recovery infrastructure remains insufficient. Existing facilities have limited processing capacity for plastic waste, and there are currently no operational facilities for energy recovery or advanced recycling of SUP products. At the same time, the Environmental Agency and local public authorities face shortages of qualified technical personnel to plan, manage, and monitor integrated waste management systems. The gradual strengthening of institutional and operational capacity, coupled with targeted technical assistance, is therefore necessary to ensure sustainable and verifiable compliance.

Given the identified gaps in infrastructure, institutional capacity, financial resources, and public awareness, the requested transitional period will provide the timeframe required to:

- Ensure full operationalisation of the DRS by 2027.
- Expand EPR schemes to cover all relevant product categories and enforce full producer cost responsibility.
- Extend separate collection systems to all municipalities and rural areas.
- Develop the domestic recycling capacity for PET and other SUP-related waste streams.
- Implement continuous public information and behavioural change programmes.

Moldova proposes the following tentative roadmap for implementation of Directive (EU) 2019/904

Table 3. Tentative Roadmap for implementation of Directive (EU) 2019/904

Year	Actions/Milestones
2026–2027	- Transpose Directive (EU) 2019/904 of the European Parliament and of the Council of 5 June 2019 on the reduction of the impact of certain plastic products on the environment by amending Law No. 209/2016 on waste. - Adopt a new Circular Economy Programme. - Develop and approve the methodologies, guidelines and implementing documents to support the implementation of the SUP legislation. - Revise the penalty system for non-compliance with waste related legislation, by amending the Contraventional Code and Law on payment for environmental pollution. - Adopt methodologies to establish rules for calculation, verification and reporting of data and methods for verifying compliance with the targets. - Ensure DRS administrator operational readiness (trainings, IT systems, contracts with retailers and recyclers). - Strengthen capacities of the Environment Agency and Environment Protection Inspectorate by strengthening human resources and skills (targeted training programmes in the field of EPR compliance), upgrading technological capabilities.

	- Develop capacity with the Environmental Agency to implement or act as a coordination mechanism for EPR supervision and enforcement.
2027-2035	- Creation of integrated waste management infrastructure in waste management zones 1, 2, 4, 5, 7 and 8, as follows: - WMZ 5 and 8 - end of 2028; - WMZ 1 - end of 2029; - WMZ 2 - end of 2032; - WMZ 4 and 7 - end of 2030. - Develop guidelines and methodological instructions to support consistent enforcement and monitoring. - Carry out information, awareness-raising, and public education campaigns on the need for proper and correct waste management.

Conclusion

Moldova aims to achieve a measurable quantitative reduction in the consumption of the single-use plastic products on the territory of Moldova and recycle the plastic by 2035. The requested transitional period is justified by the current still low recycling rates, separate collection coverage, and EPR performance, while key systems such as the Deposit-Return System and expanded separate collection networks are still in early development and require substantial investment. The phased approach will allow Moldova to operationalise the DRS, strengthen and broaden EPR schemes, expand separate collection to urban and rural areas, and build domestic recycling capacity, while carrying out awareness-raising campaigns.