

# Your Voice In Europe: ROADMAP feedback for Waste to Energy Communication

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## Related document: Waste to Energy Communication

## Feedback:

*Zero Waste Europe warns about the dangers of the approach taken by the Roadmap “Exploiting the potential of waste to energy” for several reasons.*

*In general terms, ZWE considers that “exploiting the potential of W2E” contradicts clearly the principles of a circular economy that imply limiting the material outputs of the system, meaning minimizing end-of-pipe waste treatment operations, such as landfilling and incineration –with or without energy recovery-.*

*“Exploiting the potential” implies that existing capacity should be maximized and that this fits and is in line with EU policy, which is far from reality. Energy recovery is the second least preferred waste treatment operation according with Waste Hierarchy and according to the objectives set out in the 7th Environmental Action Plan, it should be limited to non-recyclable materials. However, latest Eurostat figures show that in 2014 27% of EU28 waste went through incineration treatments. This rate has been increasing year on year since the last 10 years and, unfortunately, the 40% of the waste diverted from landfills between 2005 and 2014 has gone to incineration, not recycling.*

*This isn't only a very poor implementation of waste hierarchy, but just a mere substitution of one end-of-pipe waste treatment by another one. That is why, in general terms we believe that this roadmap isn't coherent with the overall objective of transitioning the EU towards a circular economy.*

*When looking to the specific sections of the roadmap, Zero Waste Europe considers that the roadmap isn't coherent with EU goals and EU legislation.*

*Firstly, the European Commission is focusing on Waste-to-Energy as potential contributor to energy Union through increasing energy generation, neglecting completely the crucial role that waste prevention, reuse and recycling play in preserving energy in the system, which is what the Circular Economy is about.*

*This emphasis on energy generation is also based on the supposed climate neutrality of incineration of waste of biogenic origin. This neutrality is a legal fiction, as in reality waste incineration emit significant amounts of GHG –be it biogenic or not- and some studies reveal that these emissions are higher than those of coal-fired power plants. In this regard, leaving aside whether biogenic carbon is neutral or not, the reality is that waste incineration doesn't help decarbonise European economy, mostly when most of energy produced in Waste-to-energy plants comes from plastics, 96% of which origin from fossil fuels.*

*Secondly, the European Commission is legally inaccurate when says that there are “important amounts of non-recyclable municipal waste”. No definition of non-recyclable waste can be found in the Waste Framework Directive or in the new proposal of 2015. The Commission mixes up non-recyclable waste with mixed waste, and while it’s true that mixed waste can’t be easily recycled, these are two different things.*

*While mixed waste is a problem of separate collection; non-recyclable waste is mostly a problem of product design. If properly separated, there’s no non-recyclable waste only non-recyclable materials and the solution to them isn’t burning, but re-designing to make them fit into the circular economy. By talking of “additional non-recyclable feedstock for energy recovery”, the European Commission neglects its role of guardian of the Treaties. Instead of promoting the incineration of waste being landfilled, the Commission should be calling for maximization of separate collection schemes and a strict implementation of waste hierarchy. In this same line, the Commission ignores that recycling is only the third most preferred option in the waste hierarchy when writing that the “Communication should clarify the role of W2E under the waste hierarchy as the best option for the management of combustible non-recyclable waste”. It ignores, therefore, that the most preferred option for this waste would be to prevent it or, eventually, to re-use it. If considered as non-recyclable, those products should be re-designed in a way that they are repairable, compostable or recyclable.*

*The European Commission is also inaccurate when quoting the 7th EAP as calling to phase out landfilling, when in fact the 7th EAP calls to phase out landfilling of recyclable waste. The same applies to incineration that is required to be limited to non-recyclable materials. The use of the word “materials” instead of “waste” is not casual, but it lies on reasons exposed above: waste is in general recyclable if separated properly, while some materials aren’t recyclable.*

*Thirdly, it is worrying because it doesn’t include a clear roadmap on how to tackle existing over-capacities and, actually pushes for more inflexible facilities requiring long-time investment, such as district heating. It ignores that in a circular economy, disposal facilities should instead be flexible, allowing waste managers to adapt progressively to higher recycling rates and lower levels of waste production. Linking houses’ heating system to residual waste generation through very expensive long-term facilities isn’t the best incentive to promote waste reduction, reuse and recycling.*

*Finally, this roadmap is especially worrying because it ignores the role of civil society and local governments, as the Commission aims at consulting only Member States’ regulators, “waste-to-energy” plant operators, RDF producers, the recycling industry and other waste burning industries (chiefly cement kilns). Neither municipalities, nor NGOs are included in the list, despite the fact that waste incineration remains highly contested from NGOs to local neighbourhood associations and resident groups, citing a wide range of concerns from health and environmental issues to financial problems.*