

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

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- Headquarter : Czech Republic
- Register : 060710021214-47
- Size : Large (250 or more)
- Publication : can be published with your personal information

## Related document: Waste to Energy Communication

### Feedback:

#### *Position of the Czech Association of Waste Management*

*(ČAOH – Česká asociace odpadového hospodářství) to the Roadmap :  
EXPLOITING THE POTENTIAL OF WASTE TO ENERGY UNDER THE ENERGY UNION  
FRAMEWORK STRATEGY AND THE CIRCULAR ECONOMY(ENV- UNIT A2 –  
2016/ENV/086, 1/2016)*

*ČAOH is an association of significant companies operating on the waste management market in the Czech Republic (associating more than 85 companies with ca. 7 500 employees; approximately 65 percent of whole waste market in Czech republic). We welcome this initiative targeting on the effective exploitation of energy and other resources contained in waste in line with the waste hierarchy and circular economy principles.*

*We also believe that should be used opportunities directed to meet the recycling targets and extract energy only from non-recyclable waste only in an efficient manner and in maintaining social acceptability. We agree that Member States must avoid new investments in overcapacity in mechanical and biological plants and incinerators that could compromise meeting present and future objectives. We know about the wrong experiences of some Member States that have built excessively and needless incineration plants to which waste from other states must be imported (in possible conflict with principles of proximity and self-sufficiency).*

*We consider the existing WtE processes inefficient in meeting future objectives (e.g. with respect to capital intensive and long term investments, gradual reduction of calorific value of municipal waste and so on) and investments in new plants of this type represent a step back. Conversely we support the way of treatment, sorting, recycling and economic and ecologic benefit variants of energy to waste. Also, the social opposition mentioned in the Roadmap is important, the Czech public in general opposes to build new mass incinerators through*

*referendums and petitions.*

*We as ČAOH long term support the diversity of waste management facilities while maintaining the waste hierarchy and principles of free market and economic competition. To the Roadmap concretely:*

- 1) Emphasise the importance of different technology options, plants as cement/line kilns, anaerobic digestion, RDF used in heating plants and power plants, to the EU energy mix*
- 2) We consider important the finding more energy efficient technology options if possible, only for the energy-rich part of sorted waste (not incinerating of untreated mixed municipal waste, which still contains valuable materials)*
- 3) Expressive support for Waste-derived fuels (from sorted waste) which have got significant potential in the energy*
- 4) Support for assessment general criteria for Waste-derived fuels on the level of EU (in defined plants) to achieve the best possible outcome from a Circular Economy; possible option of direction numb. 98/2008 ES which already has or is upcoming in Italy, Poland, Slovenia, Finland, Germany, Austria, Slovakia; important is also European technical norm for Waste-derived fuels EN 15359.*
- 5) We agree with the proposals of the European Parliament (European Commission) to end the subsidies to new incinerators (EP 25. June 2015 2014/2208(INI)) + EC 52014DC0398R(01))*
- 6) We support new European recycling targets and we believe that in order to meet them, we also need to further sorting also mixed municipal waste. We also agree with European Parliament and the Commission, that mistake would be to move waste from landfills into new incinerators (EP 25. June 2015 2014/2208(INI)) + EC 52014DC0398R(01))*
- 7) We already have landfill ban I Czech republic (2024). Now we need to reach the EU recycling targets (Eurostat-Czech republic–recyclation only 26% (ENV 33,9%) – EU target is 65% in 2030). Sorting of waste must have priority. Waste to energy is part of the solution, but mostly for energy-rich part of treated and sorted waste.*

*Prague, 31.3.2016*



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## **Position of the Czech Association of Waste Management**

### **(ČAOH – Česká asociace odpadového hospodářství) to the Roadmap :**

#### **EXPLOITING THE POTENTIAL OF WASTE TO ENERGY UNDER THE ENERGY UNION FRAMEWORK STRATEGY AND THE CIRCULAR ECONOMY**

(ENV- UNIT A2 – 2016/ENV/086, 1/2016)

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We also believe that should be used opportunities directed to meet the recycling targets and extract energy only from non-recyclable waste only in an efficient manner and in maintaining social acceptability. We agree that Member States must avoid new investments in overcapacity in *mechanical and biological plants* and incinerators that could compromise meeting present and future objectives. We know about the wrong experiences of some Member States that have built excessively and needless incineration plants to which waste from other states must be imported (in possible conflict with principles of proximity and self-sufficiency).

We consider the existing WtE processes inefficient in meeting future objectives (e.g. with respect to capital intensive and long term investments, gradual reduction of calorific value of municipal waste and so on) and investments in new plants of this type represent a step back. Conversely we support the way of treatment, sorting, recycling and economic and ecologic benefit variants of energy to waste. Also, the social opposition mentioned in the Roadmap is important, the Czech public in general opposes to build new mass incinerators through referendums and petitions.

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