

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

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Related document: Waste to Energy Communication

Feedback:

In relation to the lack of synergies between the waste-to-energy situation and EU policies

- *The Renewable Energy Directive incentivises the uptake of 'Used Cooking Oil' by counting twice its contribution towards the RED objective of 10% renewables in transport, without any definition of what constitutes 'used cooking oil'. This incentivises the generation of more waste and imports of used cooking oil, and that cooking oil is used 'less' before it is discarded. This is done without proper tracking of whether the cooking oil has been used or not, and its origin.*
- *The economic value of double counting for used cooking oil leads to a risk of fraud and some cases of doubtful transactions that have already been observed in the market place. The risk of fraud is enhanced by the fact that the controls of double counting material streams in the framework of the sustainability schemes do not have to be reported up to the point where the biofuel is sold to the blender. The absence of definition of Used Cooking Oil in the Renewable Energy Directive increases the risk of fraudulent practices.*
- *Directly linked to this lack of control is that effect that volumes of Used Cooking Oil can be artificially increased. Instead of, for instance, using the cooking oil as long as possible, it is discarded quicker to sell it as 'used' and maximise profits. This leads to an increased demand of virgin oil, which has an impact on the vegetable oil market.*
- *In addition, we have witnessed an increase of the imports of Used Cooking Oil into the European Union, from 52,500 tonnes in year 2009 when the RED was adopted and the double counting started to be implemented, to circa 500,000 tonnes in both years 2013 and 2014 (source: Eurostat), where surely the intention of the RED was not to import waste from overseas but valorise the use of domestically generated waste.*
- *An additional perversion is that imported Used Cooking Oil does not fit the definition of 'waste' in the Waste Framework Directive, since it has a use overseas: unlike in the EU, Used Cooking Oil in countries such as the US and China can be used as animal feed. Accordingly, it should not be treated as a waste. Yet, increasing volumes of UCO are reported on the EU biofuels market: the UK Department for Transport, in its Renewable Transport Fuels Obligations statistics for year 2013/2014 show that over a third of the UCO was from non-EU origin, with major countries of origin being the US, South Korea, UAE, Saudi Arabia and*

Malaysia. This trend continues with preliminary UK data showing the share of UCO from non EU origin was over 40%.

- *As of today, Used Cooking Oil and Animal Fats make 0.7% of the energy used in transport, which double counted, makes 1.4%. This is 30% of the European biofuels market, half of which is purely on paper, hence replaced in reality with conventional fossil fuels. (source: FO LICHTS, vol. 13, 10 August 2015)*

In relation the 'lack of clarity with respect to the waste hierarchy'

- *A proper enforcement of the waste hierarchy by Member States will prevent the artificial generation of waste identified above, although this will not prevent the use of imported used cooking oil from overseas that fails to comply with the definition of 'waste'. However, Member States are entitled to depart from the principle where it is justified by life-cycle thinking. Against this background, ePURE wishes to highlight that while it is supportive of a proper implementation of the waste hierarchy, options to depart from it should also take into consideration the economic realities of ethanol biorefineries. A too narrow application of the waste hierarchy would consider the production of energy in the form of fuel ethanol at the same level as the burning of biomass for electricity production. ePURE believes that there is a difference between the recovery of energy by incineration of waste and its valorisation through the production of a biochemical product like ethanol that can also be used for energy as a fuel.*

- *Deviations from the waste hierarchy principle should therefore encompass the realities of ethanol biorefineries that produce food, feed, biobased products and energy at the same time, from agricultural biomass and residues, and waste. It is often appropriate to use waste on site than ship it somewhere else for purposes which may be deemed more appropriate under the hierarchy. Finally, producing energy in the form of fuel ethanol provides for the economy of scale and the needed volumes to produce other higher value products which would not be produced otherwise.*

In relation the 'untapped potential from waste-derived fuels'

- *Long-term and stable policy framework as well as the enforcement of existing legislation are key to increase synergies between waste and energies policies and to provide secure and renewable source of energy in line with Energy Union Strategy. Learning from experience, guidance to Member States is required to limit waste imports from non-EU countries, to prevent the artificial generation of waste and to maximise the contribution made by renewable fuels made from genuine waste, including European renewable cellulosic ethanol, to the energy and climate objectives of the EU.*

- *ePURE believes that biobased products including energy from wastes and residues, should be promoted as renewable and sustainable alternative to fossil based products and material in order to capitalise on the R&D investments for innovative low carbon advanced biofuel technologies. The EU has so far failed to bring these innovative 'waste and residues'-to-energy technologies to the market and the conditions appear more favourable to importing high volume of dubious wastes from non-EU countries, creating a strong incentives in third countries and thus heavily conflicting with the general principle of EU's waste policy, i.e. the prevention of waste in the first place.*