

Brussels, 10 November 2016

## **ITRE vote on Circular Economy Package – ESWET’s comments**

ESWET welcomes the adoption of four opinions on the Circular Economy Package in the ITRE Committee of the European Parliament.

We believe that the waste management policy, in order to bring benefits to all EU citizens, should be based on efficient and sustainable solutions. Waste-to-Energy is one of them, as it complements Circular Economy by dealing with waste not suitable for recycling that would be otherwise landfilled. In addition, it helps recovering important materials (metals and minerals). Therefore, we believe that the voice of Waste-to-Energy sector should be taken into account.

Below, we would like to present ESWET’s comments on the opinions:

### **Waste Framework Directive**

#### **Amendment 1**

##### **Proposal for a directive – Recital 1**

ESWET welcomes the addition of energy efficiency and reduction of the energy dependency as one of the aims of good waste management. Waste-to-Energy is a net producer of sustainable energy that would be otherwise lost.

#### **Amendment 4**

##### **Proposal for a directive – Recital 3**

and

#### **Amendment 24**

##### **Proposal for a directive -Recital 22**

Transition to 100% recycling rate will not happen overnight. Hence, there will still be a need for new energy recovery capacities in some Member States that are currently landfilling a big majority of waste. Consequently, we do not support the Amendments 4 and 24 that discourage financing Waste-to-Energy plants and place them at the same level as landfilling. Waste-to-Energy is superior to landfilling for several reasons:

- energy contained in waste is recovered in Waste-to-Energy process and is used to generate electricity and heat
- landfilling creates methane that is 34 times more harmful for climate than CO2

- in turn, Waste-to-Energy reduces use of fossil fuels, which has positive impact both on climate and energy independency
- Waste-to-Energy allows for recovery of metals that were not separately collected, and would be lost in a landfill.

This is also recognised in the Waste Framework Directive and by ignoring the legally binding waste hierarchy these recitals would go against existing legislation.

#### **Amendment 7**

##### **Proposal for a directive – Recital 6**

#### **Amendment 27**

##### **Proposal for a directive – Recital 28**

ESWET supports establishing a harmonised methodology for data collection and processing. Comparable statistical data on waste management is a basis for effective policy implementation across the EU.

#### **Amendment 50**

##### **Proposal for a directive - Art. 1 – Para 1 – point 3 a (new)**

We consider that the Amendment 50, introducing obligatory sorting of waste prior to energy recovery, is unnecessary, as waste should be sorted already through separate collection. In turn, additional sorting will increase costs and energy consumption, and could be disproportionate to possible extraction of recyclables. Moreover, biodegradable waste mixed with other types of waste can be contaminated and unfit for composting, paper mixed with kitchen waste will need chemical solvent to get the oil back out again, hence it could only be treated in a Waste-to-Energy plant.

#### **Amendment 115**

##### **Proposal for a directive - Annex VIa (new)**

This amendment, listing measures that can be used to promote the application of the waste hierarchy can be helpful. However, we would like to highlight that these instruments should be implemented with taking into account their cost for citizens. Point 1.2., suggesting introducing or increasing incineration taxes and/or fees should be considered carefully. Non-recyclable waste can only be either landfilled, or recovered as energy. As a result, imposing taxes on incineration might result in increase of organised or wild landfilling. It could also boost shipments of waste to places where waste management is cheaper, but not necessarily in line with circular economy.

#### **Additional comment on incineration limits**

We welcome the Committee's decision not to support Amendments tabled to the draft opinion setting incineration limits. Incineration rates depend on the amount of the waste not suitable for recycling that needs to be treated. Hence, introducing caps would create a discrepancy between achievable recycling rate and allowed incineration rate.

## **Landfill Directive**

### **Amendment 1**

#### **Proposal for a directive – Recital 1**

ESWET welcomes the addition of energy transition and energy efficiency as one of the aims of good waste management.

### **Amendment 6**

#### **Proposal for a directive – Recital 8**

Waste management in certain EU Member States still comes down to landfilling. Waste-to-Energy is an integral part of the Circular Economy, ensuring that energy and materials from waste not suitable for recycling is recovered. Hence, we believe that the EU still needs additional energy recovery capacities to reduce landfilling. It will ensure level playing field between Member States with regard to waste management

### **Amendment 10**

#### **Proposal for a directive - Recital 11**

and

### **Amendment 18**

#### **Proposal for a directive – Article 1-paragraph 1-point 6**

ESWET supports establishing a harmonised methodology for data collection and processing. Comparable statistical data on waste management is a basis for effective policy implementation across the EU.

### **Amendment 23**

#### **Proposal for a directive – Annex (new)**

This amendment, listing measures that can be used to promote the application of the waste hierarchy can be helpful. However, we would like to highlight that these instruments should be implemented with taking into account their cost for citizens. Point 1.2., suggesting introducing or increasing incineration taxes and/or fees should be considered carefully. Non-recyclable waste can only be either landfilled, or recovered as energy. As a result, imposing taxes on incineration might result in increase of organised or wild landfilling. It could also boost shipments of waste to places where waste management is cheaper, but not necessarily in line with circular economy.

## **Packaging and packaging waste Directive**

### **Amendment 8**

#### **Proposal for a directive - Recital 7**

ESWET welcomes the amendment acknowledging the role that Waste-to-Energy can play in the management of packaging waste not suitable for recycling.

**Amendment 10**

**Proposal for a directive - Recital 8**

As in the Amendments 4 and 24 to the proposal on Waste Framework Directive and Amendment 6 of the Landfill Directive, a call not to use European Structural and Investment Funds for financing incineration does not take into account differences between Member States in waste management. Some of them will still need Waste-to-Energy capacity to divert waste from landfills and to deal with waste not suitable for recycling.

**Amendment 11**

**Proposal for a directive – Recital 10a**

Separate collection of packaging and packaging waste indisputably allows for better waste management. However, it should be treated with an integrated approach, taking into account other important aspects, such as energy efficiency and economic feasibility.

**Amendment 17**

**Proposal for a directive – Recital 16**

ESWET supports establishing a harmonised methodology for data collection and processing. Comparable statistical data on waste management is a basis for effective policy implementation across the EU.

**Amendment 33**

**Proposal for a directive – Article 1-paragraph 1-point 3-point c a (new)**

Likewise the Amendment 8, we are pleased to notice that this amendment recognises the fact that energy recovery might be in certain cases a better waste management option for environmental, technical and economic reasons.

For more information on Waste-to-Energy, please contact:

Natalia Walczak  
ESWET Policy Officer

[n.walczak@eswet.eu](mailto:n.walczak@eswet.eu)