

## ESWET Position Paper on the “Consultation on Review of the European Waste Management Targets”

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ESWET – the European Suppliers of Waste to Energy Technology – represents companies that have built and supplied over 95% of the Waste-to-Energy plants in operation in Europe. It seeks to promote the technology which, within the frame of the Waste Hierarchy, recovers energy from waste that would otherwise end up in landfills.

We welcome the opportunity to answer the consultation and detail here some of the short answers we gave throughout the online consultation webpage.

### **Defining non-recyclable waste and Waste-to-Energy’s role**

Both the Roadmap to a Resource Efficient Europe and the 7<sup>th</sup> Environmental Action Programme call for “energy recovery [to be] limited to non-recyclable materials”.

ESWET is uncomfortable with such a statement because while we support its idealism, experience shows that waste management needs pragmatism. This political signal should not be translated into a legally-binding, EU-wide cap on energy recovery like some parts of the Consultation tend to propose.

Why?

First, because in theory, all waste could be “recyclable”. Does it mean that we should close all Waste-to-Energy plants and invest senseless quantities of resources such as water or energy, most often fossil, to try recycling everything?

Second, because statistics showing waste going to recycling have a different meaning in some countries. It is important to note that not all waste that is counted as “prepared for recycling” is effectively recycled and, for some countries, the fate of sorting and recycling refuse is not reflected in Municipal Waste statistics. Addressing the representativeness of current recycling statistics is a must before setting new targets, let alone an incineration cap.

### **Blocking the best solution for residual waste will not reduce its occurrence**

ESWET does not see the setting of targets / limitations on the percentages of waste incinerated as per section 6.4 as a valuable exercise.

An incineration cap will not reduce residual waste production quantities.

If incineration is to be limited to a certain quantity by country, does it mean that the rest should be shipped to another country with remaining margin “under” its incineration cap? Or to a country outside the EU? Or should this waste be landfilled?

This is why ESWET is confident that the principle favouring recycling over energy recovery, along with positive trends in increased citizen awareness, improved waste sorting technologies and global demand for increasingly scarce resources are the most helpful towards achieving a recycling society. On the contrary, ruling out the technology that serves as a safety net against landfilling cuts the bridge to this recycling society.

### **Statistics show that Recycling influences Waste-to-Energy, not the other way around!**

Many countries have for decades invested in and prioritised recycling while also building the necessary Waste-to-Energy capacity to minimise landfilling. As recycling rates increased in those countries, spare capacity opened up in their Waste-to-Energy networks. Some plants have been closed due to a decrease in unrecyclable waste in their area, while in other strategic areas with large demand for local energy e.g. district heating, capacity has been built to supply this energy demand with foreign residual waste that was otherwise bound for landfills.

This exemplifies the priority that is given within those countries to recycling over energy recovery. Making recycling more attractive, not incineration caps, is the key to decrease residual waste quantities.

High quality recycling is logically bound to strengthen its place above energy recovery because resource scarcity will eventually make more streams of plastics and papers more attractive as materials than as fuel. Until this happens, the alternative to not recovering their embedded energy is landfilling.

### **Relieving recyclers from unrecyclable materials while keeping the resource in Europe**

The combined action of limiting landfilling and of incentivising high recycling, both through EU targets, in practice leaves a margin of flexibility where energy recovery can intervene to make up for the shortcomings of what recyclers deem not materially recoverable while respecting the landfill minimisation goals. Tying the hands of European recyclers, by barring them the energy recovery option for what they cannot use, will not make their life easier: it will certainly not contribute to improve the quality of recycling and risks bolstering shipments of waste to third countries for substandard material treatment.

### **Waste-to-Energy is preferable to landfilling**

Many parts of the consultation tend to equate incineration and landfilling, whether in statistics presentation or when it comes to indiscriminately taxing them. By recovering metals from unrecyclable waste through enhanced Bottom Ash handling, Waste-to-Energy renders a useful service to metal recyclers in quest of strategic commodities. By recovering energy from combustible resources that cannot fulfil a material purpose, Waste-to-Energy offsets the use of fossil fuels and contributes to fighting climate change. Why should these precious services be equated to the very limited functions of a landfill?

As mentioned above, limiting access to the solution to residual waste will not solve the problem. And sweeping both residual treatment options to the same level can only serve as an alibi to continued landfilling.

## **Conclusion**

ESWET stresses again its support for the Waste Hierarchy. We see the prospects for improving waste management via positive reinforcement of the reduction, reuse and recycling strategies, not by banning the best solution for what nevertheless remains as residual.

ESWET believes that the lessons of the best performing Member States should be used to guide improvement in recycling rates where they are still low; and that the steady increase in high-performing locations is bound to continue. Their policy to minimise landfilling, maximise recycling and let Waste-to-Energy plants handle the rest is reflected in statistics that should guide EU decision-makers.