EUROPEAN SUPPLIERS OF WASTE TO ENERGY TECHNOLOGY

ESWET generally supports the Circular Economy Package

17.12.2014

ESWET would like to make clear its longstanding support to the Circular Economy Package (2014/0201 COD), and in particular to the proposed targets for recycling and landfilling.

Already since the 2013 consultation on waste targets, ESWET insisted on minimising landfilling and bringing about quality recycling as key elements on the path to a circular economy. As a complement, Waste-to-Energy plants are needed to handle the unrecyclable waste that may not be landfilled anymore.

We reiterated this position on the day of the package's publication (see our previous position paper on www.eswet.eu).

Given the labelling for review of the package in the Commission Work Package of 2015, ESWET would like to reaffirm its support for the objectives it contains. At the same time, ESWET would like to underline that we share concerns expressed by other stakeholders, Member States and waste/resource management specialists with regards to the actual content of this package and would like to highlight the following points that need amendment:

1) Municipal Waste Recycling targets do not match the current and foreseen realities

The calculation methods currently used by Member States to post their "recycling rate" vary, meaning that first and foremost statistics should be clarified in order to have comparable figures from which realistic and achievable targets can be set.

Simply put, the 50% recycling rate by 2020 that is in the Waste Framework Directive (2008/98/EC) was significantly easier to reach than the 50% recycling rate under the new proposal, since it counted all waste brought to a recycling facility, not only the output which was really recycled. So reaching the 2020 target just got significantly more challenging, and when this target gets to 70% in 2030, it will be adding a lot of burden to taxpayers and municipalities.

At the same time, materials such as metals recovered from incinerator bottom ashes are not to be counted towards these targets, despite the reality that they are recycled to a very high extent and are sometimes the only way to recycle the metal in a cost effective way (e.g. metal-reinforced safety boots).

2) Municipal Waste is only a small fraction of the waste produced

Around 10% of waste we produce is Municipal (or household) Waste[1]. This is the stream which is the most heterogeneous, difficult to collect & sort and prone to contain impurities. While indeed being the most visible and worthy of ambitious objectives, other streams of non-municipal wastes that are non-inert and non-hazardous remain

[1] http://www.eea.europa.eu/signals/signals-2014/articles/waste-a-problem-or-a-resource

untackled. In fact, some Municipal Waste changes name after pre-treatment and becomes industrial waste, not subject to any targets. If the ultimate goal is to get quality recyclates and avoid landfilling, it would make sense to collect reliable statistics on other streams of waste and evaluate whether we cannot jump-start the circular economy by also tackling other, potentially more straight-forward, waste streams.

3) Quality recycling must be the aim, not quantity

It is important to understand that the side-effect of increasing the share of recycling by weight / percentage risks undermining quality recycling.

Unless groundbreaking progress is made in product policy and consumption patterns, even the fore-running EU Member States in terms of recycling rates could not possibly reach these targets other than by pushing material into downcycling. That cannot really be the aim of any new legislation, also because these downcycled materials will eventually reach the end of their life. Efforts should be on quality, not quantity.

Materials that do not find a place in the circular economy exist for a variety of reasons (polluted material, already recycled many times…), but their treatment should ensure that they do not pollute material flows and that they are isolated from the eco-cycle through treatment in Waste-to-Energy plants.

4) Need a market for recyclate (no subsidies scheme with added cost to consumers and industry)

As for materials that are of a quality enabling them to be recycled, but do not find takers, it is important to stimulate a European market for recyclates to give higher value to this material whilst favouring Europe's re-industrialisation, safeguarding local materials and preserving global resources.

Failure to create a European market pull for recyclates will translate into more exports or landfilling, which is the least desirable option. Why? First, because non-EU locations that used to accept low-value or low-quality materials are increasingly reluctant to accept them. Also, could this really be considered quality recycling?

Also, if no recycler is willing to pay the waste holder a positive price for a material, the holder will seek the easiest way of getting rid of it, which usually is landfilling.

5) Material recycling should be counted where done and legislation adapted accordingly (WtE also recycles material otherwise lost)

The variety of non-recyclable waste found in Municipal Waste is such that dedicated recycling activities cannot exist for every stream. A common thread to the majority of those products is that they contain embedded energy and/or metals. Waste-to-Energy is the only technology co-processing energy and metals from unrecyclable waste that makes such metals available for recycling in a variety of applications. For instance, in 2013, Dutch Waste-to-Energy plants yielded over 116,000 tonnes of ferrous and 24,000 tonnes of non-ferrous metal for recycling. Accounting these quantities is one way to help reaching the ambitious recycling targets.

Way Forward

ESWET is convinced that measures to limit waste production by better design and consumption patterns are necessary to maintain Europe's competitiveness. For waste that is nevertheless produced, slowing the growth in absolute tonnages of unrecyclable waste by improving conditions for recycling also goes in the right direction. Societies that recycle the most also rely on Waste-to-Energy for their residual waste, and they all achieved this through some form of landfill ban.

The key policy to kick-start the circular economy is to make it clear that landfilling of untreated municipal waste no longer figures in the equation.

This should guide decision-makers to stand by the Circular Economy Package.

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Europe's waste streams

In total, about 2500 million tonnes of waste was generated in the EU-28 and Norway in 2010. Here is an overview of where the waste came from and what it was composed of.

Waste streams by source

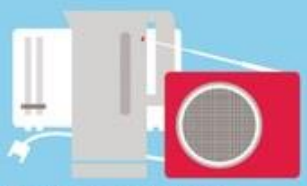
Waste streams by type of waste

43.5 %	Mineral waste
16.4 %	Soils
7.4 %	Household and similar waste
5.0 %	Combustion waste
4.4 %	Animal and vegetal waste
3.9 %	Metal waste
2.5 %	Chemical and medical waste
2.5 %	Wood waste
2.3 %	Paper and cardboard waste
12.2 %	Other waste

Source: Eurostat 2010 data on EU-28 and Norway

On average, we generate 157 kg of packaging waste per capita in the EU.

Every year, the generation of some 74 million tonnes of hazardous waste is reported in the EU.



Electrical and electronic equipment is the fastest growing waste stream in the EU, estimated to reach 12 million tonnes a year by 2020.

Sources: EEA, Eurostat, European Commission
Read more: www.eea.europa.eu/waste

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