

ESWET Input for Effort Sharing Decision Review Consultation

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ESWET, the European Suppliers of Waste to Energy Technology, welcomes the opportunity to provide input on the revision of the Effort Sharing Decision (ESD) and the EU Emission Trading System (ETS) and next steps.

About Waste Management

Following the Waste Hierarchy from the Waste Framework Directive (2008/98/EC), Waste-to-Energy (WtE) is the technology treating waste that cannot be recycled. The energy in the waste is recovered, making it available as steam, heat or electricity or a combination thereof. Contrary to energy-consuming sectors or power plants, the main role of Waste-to-Energy though is in waste management where hygienisation is needed. This sector has its own peculiarities and requires wholesome consideration.

This explains why the waste sector, and in particular Waste-to-Energy, belong to the Effort Sharing Decision, to enable full accounting of the trade-offs in waste management that can yield the best contribution to climate protection.

Waste treatment scenarios

The waste hierarchy aims at protecting the environment by saving resources, which has climate protection benefits. The hierarchy prioritises recycling waste over incinerating it, which in turn is better than landfilling it. All those activities cannot be taken in isolation and their ranking is also logical in a climate protection perspective. For instance, although recycling generates GHG emissions e.g. from energy uses, using recycled materials saves GHG compared to virgin materials.

Landfilling waste emits GHG emissions that are not counted in the ETS. Methane, a Greenhouse Gas 25 times (in mass) more damaging to the climate than CO₂, emitted from landfills is not accounted under the ETS.

If waste is not landfilled and goes instead to WtE, there will be some GHG emissions from the plant, but in the greater picture, a GHG reduction took place. Also, energy produced and used from waste avoids generating it from other, often fossil, sources.

This double action of avoiding methane emissions as well as net energy generation avoiding the use of fossil fuels can be appraised by the ESD, not the ETS.

Besides, if Waste-to-Energy was in the ETS, the only way a plant could reduce its GHG emissions would be to incinerate less of the waste nevertheless remaining after recycling, which would mean continued landfilling. That is not the point sought.

Conclusion

Small GHG emissions from one point of the cycle can in fact translate into much bigger reductions elsewhere. Waste needs treatment, and waste management priorities are already including GHG reductions within the balancing act of protecting the environment as a whole by accounting the various impacts of waste management.

The waste sector can yield the most GHG reductions as part of the Effort Sharing Decision, not of the EU Emission Trading System.