



Brussels, March 29th, 2017

TO: Members of the European Parliament ITRE Committee

Subject: Alignment of the revision of the Renewable Energy Directive with the Circular Economy Policies

Dear Members of the ITRE Committee,

Ahead of the report of the ITRE committee on the revision of the EU Renewable Energy Directive (RED II), the undersigned organisations, representing plastic and paper recyclers and zero waste associations around Europe, would like to bring to your attention our concerns as regards to inconsistency of the Commission's proposal in RED II with the Circular Economy policies and the EU's climate policy agenda.

This is due to the consideration of the biomass fraction of mixed municipal solid waste as a source of renewable energy when it is actually burning thanks to other materials (e.g. plastics and paper). Member States are consequently allowed to support various forms of energy generation from waste, to meet targets set under the RED II. These schemes which support waste-to-energy generation from mixed municipal waste, run counter to the EU's transition to a low-carbon and circular economy, furthermore this would work to:

1. Undermine the Waste Hierarchy and the Circular Economy policies

Financial support for waste-to-energy from mixed municipal waste subverts one of the cornerstones of the EU waste policy – the waste hierarchy -, which establishes an order of priority in waste prevention and management i.e. prevention, preparation for re-use, recycling, other recovery (energy recovery), and disposal¹. Waste is therefore meant to be firstly prevented, then prepared for reuse and, finally, recycled. Conversely, the RED II classifies it as a source of 'renewable energy' and allows renewable energy support schemes that conflict with the waste hierarchy by encouraging waste-to-energy processes, which is the second least desirable option of the waste hierarchy.

The effect so far has been a clear distortion of the market whereby investment in waste infrastructure and operation costs are organised on the basis of subsidies for the extraction of energy from waste instead of sound environmental and economic performance of the best waste management option. As a result, several European countries e.g. Denmark have overinvested in energy-from-waste plants whilst underinvesting in recycling facilities.

2. Undermine the Communication on Waste-to-Energy in the Circular Economy

The RED II also contradicts the Commission's recent Communication on the Role of Waste-to-Energy in the Circular Economy which states that public financing of waste management, whether national or at EU level, should be consistent with the waste hierarchy and Member States should phase-out public support for the recovery of energy from mixed waste in line with the separate collection obligations and more ambitious EU recycling targets proposed in the legislative proposal on Circular Economy².

¹ http://ec.europa.eu/environment/waste/framework/pdf/guidance_doc.pdf

² <http://ec.europa.eu/environment/waste/waste-to-energy.pdf>

3. Undermine the EU's Climate Policy Agenda

The Commission's proposal also undermines the EU's climate agenda by supporting energy generation from mixed municipal waste, which is never solely composed of biogenic carbon. Much of the calorific value from waste-to-energy processes from mixed waste (incineration, pyrolysis or gasification) comes from the treatment of fossil carbon based materials such as plastics. For example, a typical waste incineration facility has a carbon intensity of approximately 600 kg CO₂ eq. per MWh of electricity. This compares with a figure of 380 kg CO₂ per MWh of electricity at an efficient natural gas power station using Combined Cycle Gas Turbine technology³.

Moreover, the monitoring of the amount of the proportion of organic waste compared to the amount of fossil-based waste in municipal mixed waste is both logistically and technologically difficult. It's often assumed that the proportion is 50% - even if industrial and commercial waste is frequently included in the mix of waste entering a waste-to-energy facility. Given the heterogeneity of waste and the great differences from plant to plant, this percentage is neither constant nor reliable, which supports the evidence that much of the so-called renewable energy from waste-to-energy comes in fact from incinerating fossil carbon based materials.

The undersigned organisations therefore urge the members of the ITRE Committee to align the Commission's proposal for a revised Renewable Energy Directive with the circular economy policies by explicitly excluding primes of subsidies for waste-to-energy generation from the mixed municipal solid waste.

Kinds regards,

On behalf of signatories

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³ <https://www.zerowasteurope.eu/downloads/the-potential-contribution-of-waste-management-to-a-low-carbon-economy/>