



Feedback on the European Commission roadmap on the Energy from waste communication

Submitted on behalf of the Quaker Council for European Affairs - March 2016

The Quaker Council for European Affairs (QCEA) is extremely concerned that this roadmap on the energy-from-waste communication undermines the European Union's laudable attempts to transition to a circular economy.

Incineration with energy recovery is the penultimate step of the waste hierarchy, preferable only to landfilling; in a true circular economy, any burning of waste must be considered a failure. It is crucial that the EU ensures consistency between its energy and waste policy by making sure that energy-from waste is not unduly promoted, and the waste hierarchy is followed in all relevant European policy.

Below we outline a number of our concerns: overcapacity and lock-ins, waste prevention and eco-design, and energy inefficiency and climate.

Overcapacity and lock-ins

Building incineration plants encourages waste creation in order to feed these plants, and requires huge investment, thus making it harder to reduce our residual waste generation and therefore achieve the goal of establishing a circular economy. Currently in Europe, many member states already have incinerators which do not have enough waste to burn. The EU should establish moratorium on the construction of new Waste to Energy plants until a proper analysis on the existing capacity across the EU is performed.

Along with this, the Commission must develop plans on how to reduce existing over-capacities of incineration, rather than encourage their use for long-term facilities like district heating. Incineration projects like this will obstruct Europe's transition to a truly circular economy for many decades to come.

Waste prevention and eco-design:

It should be the European Union's goal to reduce our waste generation, as outlined in the Waste Framework directive. Instead, this communication sees European Member States relying on it to provide their energy. This is not sustainable, and contradicts the principles of a circular economy. Rather than promoting end-of-pipe solutions like incineration, the European Commission should take decisive action to eliminate "Non-recyclable waste" and materials at design stage, addressing the root causes of our waste in our economic system.

A strong eco-design directive, covering non-energy related products and setting minimum criteria for durability, reparability and recyclability, would go a long way to reducing "non-recyclable" waste, and is a much more sustainable option than burning waste. Including requirements on certain materials (discouraging the use of difficult to recycle materials and dangerous chemicals through design criteria and economic incentives for example) would also contribute to waste reduction. The EU should also adopt concrete targets waste prevention, for instance by targeting a reduction in residual waste per capita, thus lessening the need for incineration, and increasing the risk on any investment in incineration plants.

Energy inefficiency and climate

This roadmap describes waste incineration as renewable energy. It is imperative that this classification is changed immediately, if the European Union is truly committed to a circular economy. Burning waste is not renewable energy; while it is possible to continue generating

waste, our goal - and that of a circular economy - should be to achieve zero-waste, through a combination of eco-design, prevention, reuse and recycling. Waste is not renewable in the same way as the sun or the wind!

Furthermore, burning waste is one of the most polluting and inefficient forms of energy in existence: per megawatt-hour of energy, waste to energy produces more carbon dioxide than any fossil fuel. Per megawatt-hour, burning waste emits an average of 2.5 tonnes of carbon dioxide and 2.8 tonnes of nitrous oxide, both of which are greenhouse gases. Burning waste is also incredibly inefficient in terms of energy generation: in order to produce the same amount of energy as a coal plant, the average United States incinerator produces 28 times as much dioxins and 2.5 times as much carbon dioxide. Clearly then, energy from waste will not help the European Union meet its climate targets. On the other hand, waste avoidance and recycling can save more energy - the energy embedded in products and materials - than burning waste could produce, and without any extra greenhouse gases being emitted.

In addition, the contribution of waste to energy to Europe's energy creation is limited - if we burnt all the municipal waste we are not required to recycle it would only provide 2% of our energy demand by 2020. The targets set in the new circular economy package would mean that by 2030 only 25-35% of Europe's waste should be incinerated - it is not worth investing in incineration plants for this amount. The EU should not provide any funding for such projects, so as not to delay the transition to a circular economy and a zero-waste society.

Inclusion of stakeholders

It is also extremely problematic that this roadmap ignores the role of civil society, and local governments, by not mentioning them in the list of stakeholders, given the considerable health and environmental concerns around incineration plants from many NGOs, and citizens. All of these stakeholders must be included in any consultation around waste to energy.

Finally, it is important to stress that the waste hierarchy is not a ladder: it is possible for countries dependent on landfill to skip incineration altogether by focussing on recycling and reuse. The European Commission should be taking ambitious long-term decisions, targeting recycling, reuse and prevention, not trying to perpetuate current out-dated modes of energy production.