



Confederation of European Waste-to-Energy Plants

Open letter to:

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Triple win in the new Circular Economy Package

Dear Commissioners,

With regard to the upcoming proposal on the Circular Economy package, CEWEP would like to urge you not to miss the triple win opportunity to set **ambitious binding targets to divert recyclable and recoverable waste from landfills**.

This would serve:

- the **environment** as well as
- the **climate and energy policy** and
- the **EU's economy** as it would **create jobs and growth**.

The benefits of diverting recyclable and recoverable waste from landfills are the following:

1) Good for the Environment

By diverting waste from landfilling, the ground and water will not be exposed to pollution due to leachate and the loss of land will be avoided.

It will prevent the microplastics from being blown by the wind from (legal and illegal) landfills into the seas or rivers.

By avoiding landfilling, plastics can be recycled for a second life or, if this is not possible, recovered for energy: high quality recycling which is necessary for an efficient circular economy is complementary to Waste-to-Energy.

Moving away from landfills, higher up the waste hierarchy will increase the volume of secondary raw materials.

2) Contribution to climate and energy policy

Diversion from landfill is the main contributor to greenhouse gas mitigation in the waste management sector. Diverting municipal waste from landfills would save 92 million tonnes of CO₂ emissions in EU-28 by 2030¹. This is around 8% of what the EU still has to save to achieve its 2030 greenhouse gas emission targets.

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¹ The Climate Change Mitigation Potential of the Waste Sector, Institute for Applied Ecology (Öko-Institut) and the Institute for Energy and Environmental Research (IFEU) on behalf of German Federal Environment Agency (UBA), <http://www.umweltbundesamt.de/publikationen/the-climate-change-mitigation-potential-of-the>



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Minimising landfilling is a low hanging fruit with regard to the upcoming discussions at the United Nations climate summit in Paris in December.

Recovering energy from the non-recyclable waste contributes to the EU's Energy Union goals of reducing greenhouse gas emissions and dependence on fossil fuel imports. In 2012 EU-28 imported 107 billion m³ of natural gas from Russia. The energy content of the waste treated by European Waste-to-Energy plants amounts to 19% of these gas imports.

Member States which still landfill a lot often have district heating systems which with minimal modernisation could be used to provide local secure energy from waste.

This should stimulate investment as foreseen in the "Juncker plan".

3) Boost Europe's Economy

Allowing only pre-treated waste² to be landfilled will boost the recycling economy and provide Europe with more secondary raw materials. From the non-recyclable waste cost-effective and secure energy can be produced. This will create jobs and growth.

Using the Juncker Investment Fund and structural funds to invest in waste source separation and treatment options higher up the hierarchy might even help Europe to change its currently deflationary trajectory in the coming years.

Please keep in mind that the aftercare period for landfills lasts for decades. Therefore landfilling is not as cheap as it might look like at first glance.

Diverting recyclable and recoverable waste from landfills is the first step towards a recycling and recovering society for a sustainable use of our resources. Setting ambitious recycling and recovering targets is the second step that can only be done after the first step (diverting waste from landfills).

With kind regards

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CEWEP (Confederation of European Waste-to-Energy Plants) is the umbrella association of the owners and operators of Waste-to-Energy plants (waste incineration with energy recovery) across Europe. CEWEP's members are committed to ensuring high environmental standards, achieving low emissions and maintaining state of the art energy production from remaining waste that cannot be recycled in a sustainable way.

² E.g. not exceeding a certain Total Organic Carbon threshold