



Joint statement on the European [Commission's legislative proposal](#) on the European Regional Development Fund (ERDF) and on the Cohesion Fund 2021-2027

The undersigning associations support an integrated waste management approach with an appropriate and sustainable interaction of source separation, reuse and recycling, energy recovery and environmentally sound disposal of waste that cannot be recovered. It is by applying this approach that the most virtuous countries (in terms of recycling) have achieved their results.

Cohesion funds are important instruments to help Member States that still have low recycling rates and depend heavily on landfills, to create a sustainable waste management system using adequate investment to set up an effective separation collection scheme paired with the appropriate infrastructure needed to treat each stream. This includes sorting, preparation for reuse, recycling, biowaste treatment and residual waste treatment infrastructure in line with the [Waste Hierarchy](#).

This treatment capacity does not exist in most Member States benefitting from the ERDF and Cohesion Funds. A categorical exclusion of investments in facilities for the treatment of residual waste (as suggested in Article 6 (1) g of the European Commission's proposal for the ERDF and Cohesion Fund) can prevent these Member States from achieving the targets set in the Circular Economy Package. In order to achieve high recycling rates with low landfill rates, the whole waste management system from communication and collection to treatment of the residual fraction must be carefully designed and executed. Only with such a holistic process, can effective waste management which prevents environmental degradation, protects human health and generates recovered raw materials and energy to feed a circular economy succeed.

An integrated approach within the circular economy needs an outlet for residual waste. Residual waste consists of the parts of the waste that are of poor quality (e.g. degraded material after several times of recycling), waste that is not suitable for recycling and therefore must be rejected by the recycling facilities, or polluted waste. If there is no environmentally sound treatment for this waste there is a risk that the production cycle will be contaminated with pollutants showing up in products, on uncontrolled landfills or in open fires causing damage to human health and the environment. Waste-to-Energy preserves the value of this residual waste by turning it into electricity and/or heat (mostly in efficient cogeneration) under strictly controlled conditions, preventing resource losses, decreasing the need for fossil fuels, increasing energy security and reducing greenhouse gas emissions. This is key to make the bridge between the circular economy, energy union and climate change objectives.

In line with the above, the undersigning associations support the continued eligibility of Waste-to-Energy facilities to receive funding from the ERDF and Cohesion Funds.

The European Commission's Waste-to-Energy communication rightly quotes *"the existing guidelines on state aid for environmental protection and energy which state that support for energy from renewable sources using waste or support for cogeneration and district heating installations using waste can make a positive contribution to environmental protection provided it does not circumvent the waste hierarchy..."*

Therefore, the undersigning associations **support the following amendment with regard to Article 6 paragraph 1 – point g:**

...funds shall not support...

ITRE Committee

Text proposed by the Commission	Amendment 219 from Carlos Zorrinho
(g) investment in facilities for the treatment of residual waste;	(g) investment in facilities for the treatment of residual waste that are not in line with the waste hierarchy according to Article 4 of the Directive (EU) 2018/851 of the European Parliament and of the Council amending Directive 2008/98/EC on waste;

[ITRE Committee Draft Opinion](#)

[ITRE Amendments](#)

The co-signatories would also like to highlight and request legislative acknowledgement for the particular situation of islands and remote settlements which for reasons of distance, weather conditions or both may not be able to adhere strictly to the waste hierarchy. In such cases, deviations from this, tailored to their waste types and quantities, should be enabled and supported with funding. This deviation should not apply to landfilling but should include Waste-to-Energy.

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Municipal Waste Europe is the European umbrella association representing public responsibility for waste.

<https://www.municipalwasteurope.eu>

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Euroheat & Power represents the District Heating sector in Europe.

www.euroheat.org

Hans Korteweg, Managing Director, COGEN Europe, the European Association for the Promotion of Cogeneration, is the cross-sectoral voice of the cogeneration industry.

www.cogeneurope.eu

Ella Stengler, Managing Director, Confederation of European Waste to Energy Plants

CEWEP is the umbrella association of the owners and operators of European Waste-to-Energy Plants.

www.cewep.eu

FEAD, the European Federation for Waste Management and Environmental Services, represents the private waste and resource management industry across Europe.

<https://www.fead.be/>