



CEWEP Statement on Circular Economy Action Plan 2

11th March 2020

Today the European Commission published its new *Circular Economy Action Plan – Green Deal*. CEWEP believes that it is very timely and necessary to introduce a new set of ambitious proposals for circularity, from product design to sustainable waste management.

CEWEP supports the creation of a **well-functioning market for secondary raw materials** and welcomes the initiative to harmonise the national end-of-waste and by-product criteria and develop EU-wide criteria, in order to achieve a level playing field.

In particular, CEWEP supports the **Strategy for a Sustainable Built Environment**, including recycled content requirements and Green Public Procurement. CEWEP believes that this will allow its members to make even more important contributions to circularity by **using bottom ash, the left over from the incineration process, for construction purposes while taking into account safety and quality criteria of the material**. This comes in addition to the recycling of metals from bottom ash, made possible by the European Waste-to-Energy Sector, that saves considerable amounts of greenhouse gases¹.

We are also looking forward to contributing to the forthcoming **European Strategy on Sustainable and Smart Mobility** that is announced in the Commission's Communication. **Energy from Waste-to-Energy plants can be used to produce hydrogen which fuels buses and waste trucks, thus contributing to low carbon transport**.

CEWEP greatly appreciates the announcement to **restrict “exports of waste that have harmful environmental and health impacts in third countries”** as we believe that we should deal with our waste challenges here in Europe, where it is produced. In order to do that in an environmentally sound way appropriate capacity for recycling and for residual waste treatment must be available in Europe².

As we are convinced **supporters of real waste prevention**, we appreciate the Commission's objective to *“halve the amount of residual (non-recycled) municipal waste by 2030”*. At the same time, we have considerable reasons to be concerned about it, because we fear that a quantitative reduction target could be counterproductive and would not result in the intended reduction in waste generation but rather in fly tipping, illegal dumping and open burning of waste. Illegal dumping does not only happen in third countries, we have some notable examples also here in Europe³.

The Communication states that **‘High quality recycling relies on effective separate collection of waste’**, and CEWEP agrees. However, a push for a quantitative reduction of residual waste alone can have the opposite effect and bring about considerable contamination of the recycling streams, this way heavily impeding the goal to *“minimise the presence of substances that pose problems to health or the environment in recycled materials”* and the creation of a *“well-functioning internal market for secondary raw materials”*.

CEWEP believes that well prepared and thoughtfully implemented eco-design and effective source separation of recyclables are the way forward to sustainably reduce the amounts of residual waste.

Furthermore, we are disappointed to see **no further efforts on landfill reduction**. Around 175 million tonnes of waste are still being landfilled in Europe every year (not counting the major amount of mineral wastes). This leads to more than 140 million tonnes of CO_{2eq} emissions. While the targets for municipal waste landfilling were set back in 2018, municipal waste is just 10% of the total waste volume. **The Communication does not introduce binding measures to reduce the amounts of industrial and**

¹ More information about bottom ash is available in CEWEP Bottom Ash Factsheet

<https://www.cewep.eu/bottom-ash-factsheet/>

² Which is currently not the case, see calculations on needs for recycling and residual waste treatment capacities

<https://www.cewep.eu/circular-economy-calculator/>

³ e.g. [France](#), [Poland](#), [Romania](#), [Italy](#)

commercial waste going to landfills and shift them higher up the Waste Hierarchy. Regarding these waste streams, we would like to underline that the Waste Framework Directive foresees (art 11 (6)) that *“by 31 December 2024, the Commission shall consider the setting of preparing for re-use and recycling targets for construction and demolition waste and its material-specific fractions, textile waste, commercial waste, non-hazardous industrial waste and other waste streams (...)”*.

This is an opportunity to also set landfill targets, taking into account that diverting waste from landfills does not only bring multiple environmental benefits, including soil and water protection, but is also the low-hanging fruit for greenhouse gas mitigation in the waste sector.

CEWEP asks the European Commission and the policymakers to take the most effective means to minimise large scale landfilling as soon as possible by setting a cap also for waste streams other than municipal. This would create a level playing in EU Member States which is currently not the case and would be a more effective tool than just relying on landfill taxes. Taxes are under the prerogative of the Member States and could encourage transboundary shipments to Member States with lower fees.

We regret that the Commission's Communication does not make the distinction between landfilling and incineration (with energy recovery) when it encourages the application of both, landfill and incineration taxes. Putting both in one basket means that the Waste Hierarchy is not respected. Not only Waste-to-Energy incineration is higher up the Waste Hierarchy but it also helps the EU to become less dependent on fossil fuel imports for energy purposes, while dealing with substances of concern that are embedded in non-recyclable waste.

Finally, CEWEP would be happy to share the long-term experience of its members and contribute constructively to the high-level exchanges on circular economy and waste as well as to the Global Circular Economy Alliance to identify knowledge and governance gaps in advancing a global circular economy and take forward partnership initiatives.

For further information, please contact CEWEP (info@cewep.eu), tel. +32 2 770 63 11

CEWEP (Confederation of European Waste-to-Energy Plants) is the umbrella association of the operators of Waste-to-Energy plants 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.