



To: Environment Ministers of EU Member States

Berlin, 15 December 2021

Inclusion of waste incineration in the EU emissions trading system

Dear Minister,

The plans to expand the European Emissions Trading Scheme (EU ETS) presented by the EU Commission on July 14, 2021 are currently subject of intense debate. However, CO₂ emissions from waste incineration plants are still exempted in the Commission's proposal. With more than 95 million tons of CO₂ equivalents annually, waste incinerators in the EU are driving climate change. **The undersigned associations therefore urge you again to advocate for the application of the polluter-pays principle and the extension of the ETS to municipal waste incineration at the upcoming EU Environment Council meeting, on December 20, 2021.**

The amount of greenhouse gases emitted is comparable to the emissions of 13.4 coal-fired power plants per year. The current exemption for municipal waste incineration in Annex I of the Emissions Trading Directive (2003/87/EC) thus thwarts the rapid development of a circular economy and efforts to protect the climate. The trend is moving in the wrong direction throughout Europe: in many EU countries, further waste incineration plants are to be built.

A recent study carried out by CE Delft on the possible effects of including waste incineration in the ETS concludes that such an economic incentive could lead to waste reductions of up to 5 and 25% respectively for households and businesses¹. The example of Sweden also shows that such inclusion creates incentives to improve separate collection, especially of plastics. In Stockholm, 75% of plastic waste is now recycled rather than incinerated.

To our knowledge, the EU Parliament's Environment Committee recognizes these advantages and will therefore most likely endorse the extension of emissions trading to municipal waste incineration. **In the Council of EU Environment Ministers a common stance is currently being sought. It is therefore all the more important that your country supports the extension.**

In order to achieve the EU's climate protection targets, waste incineration capacities must be reduced and the climate protection potential of material recycling must be fully exploited. The incineration of municipal waste not only pollutes the climate, but also produces toxic residues such

¹ <https://zerowasteurope.eu/library/waste-incineration-under-the-eu-ets-an-assessment-of-climate-benefits/>

as slags and filter dusts that have to be landfilled underground. These residues endanger people and the environment.

The undersigned associations also point out that, in a second step, the incineration of organic waste should not be rated with an emission factor of zero within the ETS (see Annex IV to Directive 2003/87/EC). The envisaged sustainability criteria under the Directive on the Promotion of the Use of Energy from Renewable Sources (RED) (2018/2001) for biomass (see Annex IV of Directive 2003/87/EC) are not sufficient to meet the objectives of a circular economy, climate protection and resource conservation. When organic waste is incinerated, important minerals such as nitrogen and phosphorus are lost as potential plant nutrients. By contrast, the fermentation and composting of this waste can make an important contribution to reducing the burden on the climate.

We therefore urge you to strongly advocate for the deletion of the exemption clause for the incineration of municipal waste at the EU Council meeting on December 20, 2021.


Yours sincerely,



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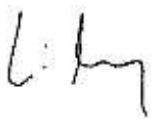
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