

# Open Letter on the Implementation of the RED in the European Union: Excluding Waste Incineration from the Waste Heat Targets

**Dear European Commission and Leaders of European Union Member States,**

We are writing to urgently address a critical issue regarding the potential classification of waste incineration's heat output as 'waste heat' within the regulatory framework of the Renewable Energy Directive (RED). This misclassification poses significant challenges to sustainability goals and could undermine efforts to transition towards cleaner energy sources.

**The imperative for a swift transition to clean heating solutions cannot be overstated.**

With climate change looming as an existential threat, Europe must accelerate its shift towards environmentally sustainable renewable energy sources. The RED can contribute to achieving this objective by establishing targets and fostering a supportive regulatory framework.

**Waste incineration, while yielding energy, is far from a sustainable or clean solution, let alone renewable.** Here's why:

- **Environmental impacts:** As with fossil fuels, waste incineration emits greenhouse gases and pollutants, impeding progress towards the EU's climate and zero pollution targets. According to [UNEP](#), the waste incineration process generates 1.2 tonnes of CO<sub>2</sub> for every tonne of waste incinerated. Recent [studies](#) also highlight concerns regarding human health and environmental preservation as well that the greenhouse gas emissions associated with district heating from waste incineration are no more favourable than those from conventional gas-fired boilers.<sup>1</sup> Therefore when considering emissions from non-fossil CO<sub>2</sub> generated during waste incineration, the situation worsens, effectively doubling emissions for both electricity and gas.
- **It disincentivizes waste prevention and recycling:** Focusing on incineration undermines the waste hierarchy, which prioritizes efforts to minimise waste generation and promote prevention, reuse, recycling or recovery, essential

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<https://zerowasteurope.eu/wp-content/uploads/2023/01/Debunking-Efficient-Recovery-Full-Report-EN.docx.pdf>

components of a circular economy. Too often, municipal waste is depicted as “unavoidable” to justify its incineration despite still containing recyclable materials.<sup>2</sup>

- **It locks us into unsustainable practices:** Expansion of incineration infrastructure perpetuates reliance on waste as a fuel source, hindering investment in genuinely renewable sources. This is while there are enough renewable sources to cover the current and potential use of waste incineration multiple times.<sup>3</sup> By making incineration an integral part of our heating system, we will create a dependency on continued and purposeful waste generation to guarantee a stable fuel supply.
- **It risks creating perverse incentives for operators:** There's a risk that granting permits based on the generation of 'waste' heat could create perverse incentives for incinerator operators. They might seek permits without utilizing heat initially, only to later claim they're producing 'waste' heat because it wasn't previously utilized. However, even if the facility initially categorizes the heat as 'waste heat' due to non-utilization, this designation becomes obsolete when the facility undergoes replacement or renewal. At that juncture, there is no 'waste' heat available since the infrastructure for heat distribution already exists.

**A strong RED should prioritize genuine renewable energy sources for district heating** like heat pumps, solar thermal, and geothermal. These sources offer a cleaner, more sustainable path to achieving our energy goals.

Including waste incineration in the waste heat definition contradicts the current legal framework and is unnecessary for heat recovery:

- As one of the main characteristics of waste heat, the RED stipulates that heat production **should be a by-product** of the process concerned. However, in the case of waste incineration, heat production is its core component.
- Facilities must recover heat as far as practicable to obtain permits (as outlined in Articles 44 and 50 of the IED). This prerequisite renders the notion of 'waste heat' untenable.

We urge the European Commission and Member States to:

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<sup>2</sup>

[https://zerowasteurope.eu/wp-content/uploads/2024/01/Jan24\\_zwe\\_-Joint-Position-on-mandatory-CCS-in-WTE.pdf](https://zerowasteurope.eu/wp-content/uploads/2024/01/Jan24_zwe_-Joint-Position-on-mandatory-CCS-in-WTE.pdf)

<sup>3</sup>

[https://api.euroheat.org/uploads/Heat\\_matters\\_the\\_missing\\_link\\_in\\_RE\\_Power\\_EU\\_Aalborg\\_University\\_2023\\_f362bc76ba.pdf](https://api.euroheat.org/uploads/Heat_matters_the_missing_link_in_RE_Power_EU_Aalborg_University_2023_f362bc76ba.pdf), figure 27, page 32.

- **Explicitly exclude waste incineration from the scope of ‘waste heat’ targets in the RED.**
- **Prioritize waste prevention and establish ambitious recycling targets.**
- **Invest in innovative technologies for clean energy generation and resource recovery.**

By implementing these measures, the EU can demonstrate true leadership in transitioning towards a sustainable energy future. We firmly believe that focusing on genuine renewables alongside a robust waste hierarchy, with prevention and recycling at the forefront, represents the most effective strategy for achieving a truly circular economy and preserving our planet’s health.

**We stand ready to work collaboratively with policymakers to ensure a sustainable RED implementation that prioritizes true renewable energy sources.**

**Sincerely,**

Bankwatch Romania

Bond Beter Leefmilieu

Bund für Umwelt und Naturschutz Deutschland

Carbon Market Watch

CEE Bankwatch

Center of Environmental Activities (Slovakia)

Centre for Transport and Energy (Czechia)

Changing Markets Foundation

Climate Action Europe (CAN) Europe

Comité Schone Lucht

Deutsche Umwelthilfe e.V

Ecological News (Ukraine)

Ekologi brez meja

Environmental Coalition on Standards (ECOS)

Environmental Investigation Agency

Estonian Green Movement

European Environment Bureau

Fern

Friends of the Earth - SPZ (Slovakia)

Friends of the Earth Cyprus

Friends of the Earth Malta

Friends of the Earth-CEPA (Slovakia)

GLOBAL 2000 - Friends of the Earth Austria

Galliffrey Foundation

Green Liberty (Latvia)

Health and Environment Justice Support (HEJSupport)

Hnutí DUHA - Friends of the Earth Czech Republic

Humusz Szövetség

Leefmilieu-NL

Mariupol Zero Waste (Ukraine)

Mouvement Ecologique Luxembourg

Observatoire du principe pollueur-payeur (France)

Oikologiki Etaireia Anakyklosis

OZ CKCH

Polish Green Network (Poland)

Polish Zero Waste Association

SOSNA association (Slovakia)

VšĮ “Žiedinė ekonomika”

We want a healthy country (Slovakia)

ZERO - Association for the Sustainability of the Earth System

Za Zemiata - Friends of the Earth Bulgaria

Zaporizhzhia Zero Waste (Ukraine)

Zelena akcija - Friends of Earth Croatia

Zero Waste Alliance Ukraine

Zero Waste Europe

Zero Waste France

Zero Waste Germany e.V.

Zero Waste Italy

Zero Waste Kharkiv (Ukraine)

Zero Waste Latvija

Zero Waste Lutsk (Ukraine)

Zero Waste Montenegro

Zero Waste Society (Ukraine)

Zero waste Lutsk

Znepokojené matky