



#zerowaste

# 'How the current EU policy landscape is supporting the transition away from incineration'

Webinar: Are we entering an age of decommissioning?

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# EU Policy Landscape to support the transition

- **INTRODUCTION**
- **EU FUNDS**
  - **Moratorium on waste incineration**
  - **Taxonomy - significant harm**
  - **Avoid false solutions**
- **WASTE POLICY**
  - **From landfill target to residual waste target**
  - **Minimising waste incineration**
- **CLIMATE AND ENERGY POLICIES**
  - **Misleading GHG accounting**
  - **Contradiction with the waste hierarchy**
- **CONCLUSIONS**

# EU FUNDS – ‘de facto’ MORATORIUM

- The EU funds have stopped funding waste incineration (D10 & R1):
  - Regional Development Fund & Cohesion Fund
  - The Just Transition Fund
  - Recovery and Resilience Fund



Transition to a circular economy, including waste prevention and recycling:

Is the measure expected to:

- (i) lead to a significant increase in the generation, incineration or disposal of waste, with the exception of the incineration of non-recyclable hazardous waste; or
- (ii) lead to significant inefficiencies in the direct or indirect use of any natural resource at any stage of its life cycle which are not minimised by adequate measures; or
- (iii) cause significant and long-term harm to the environment in respect to the circular economy?

*Example of non-compliance with DNSH*

While this measure aims to divert, among others, combustible non-recyclable waste from landfills, the Commission would likely consider this measure to develop or “lead to a significant increase in the generation, incineration or disposal of waste, with the exception of the incineration of non-recyclable hazardous waste” for the following reasons.

The construction of new waste incinerators to increase the existing incineration capacity in the country leads to a significant increase in the incineration of waste, which does not fall under the category of non-recyclable hazardous waste. Therefore, it is in direct breach of Article 17(1)d(ii) (“Significant harm to environmental objectives”) of the Taxonomy Regulation.

The measure hampers the development and deployment of available low-impact alternatives with higher levels of environmental performance (e.g. reuse, recycling), and could lead to a lock-in of high-impact assets, considering their lifetime and capacity. Significant amounts of non-hazardous waste (recyclable and non-recyclable, indistinctively) might be used as feedstock, thus hampering, as regards recyclable waste, treatment ranking higher in the waste hierarchy, including recycling. This would undermine the achievement of recycling targets at national/regional level and the national/regional/local Waste Management Plan adopted in accordance with the amended Waste Framework Directive.

# EU FUNDS – ‘de facto’ MORATORIUM

## ● Taxonomy Regulation & Delegated Acts

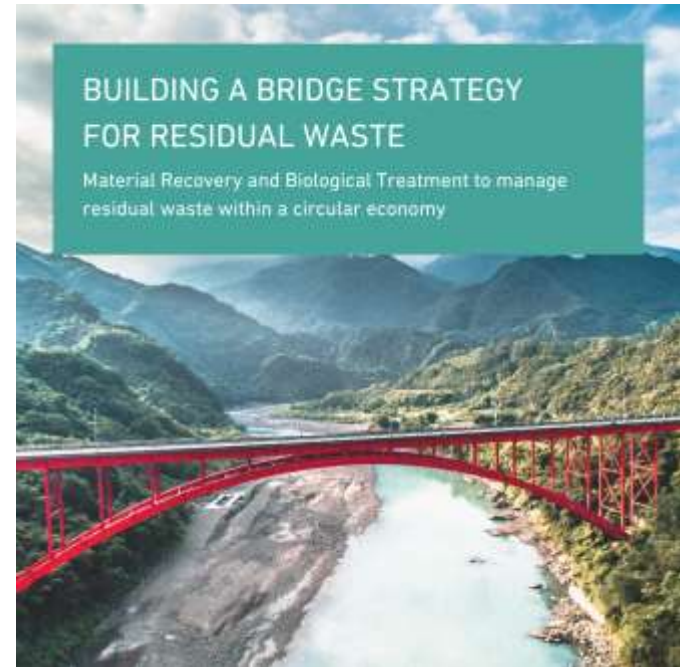
### 1. What is ‘Do No Significant Harm’?

For the purposes of the RRF Regulation, DNSH is to be interpreted within the meaning of Article 17 of the Taxonomy Regulation. This article defines what constitutes ‘significant harm’ for the six environmental objectives covered by the Taxonomy Regulation:

1. An activity is considered to do significant harm to *climate change mitigation* if it leads to significant greenhouse gas (GHG) emissions;
2. An activity is considered to do significant harm to *climate change adaptation* if it leads to an increased adverse impact of the current climate and the expected future climate, on the activity itself or on people, nature or assets <sup>(6)</sup>;
3. An activity is considered to do significant harm to the *sustainable use and protection of water and marine resources* if it is detrimental to the good status or the good ecological potential of bodies of water, including surface water and groundwater, or to the good environmental status of marine waters;
4. An activity is considered to do significant harm to the *circular economy*, including waste prevention and recycling, if it leads to significant inefficiencies in the use of materials or in the direct or indirect use of natural resources, or if it significantly increases the generation, incineration or disposal of waste, or if the long-term disposal of waste may cause significant and long-term environmental harm;

# EU FUNDS – ‘de facto’ MORATORIUM

- **Avoid regrettable projects such as CCS on incinerators**
  - **Creates further lock-in due to increased cost**
  - **Limited use of CCS**
- **Recommendation**
  - **Focus on material recovery & biological treatment**





# EU WASTE POLICY – from landfills to residuals

- **Limited focus on limiting landfilling :**
  - The 10% Landfill target - the paradox of percentages versus weight

Can't you see what's wrong with the 10% Landfill target?



# EU WASTE POLICY – from landfills to residuals

- Recommendations:
  - Redefine the waste hierarchy





# EU WASTE POLICY – from landfills to residuals

- **Limited focus on landfills :**
  - The paradox of the 10% landfill target
  
- **Recommendations:**
  - Redefine the waste hierarchy
  - **Set a residual waste target**

Waste Prevention Framework	
Sustainable production	Overall waste prevention targets for MSW
	Product-specific waste prevention targets
Sustainable waste management	Maximum residual waste targets
	Preparation for reuse & recycling targets

# EU WASTE POLICY – from landfills to residuals

- **Limited focus on landfills :**
  - The paradox of the 10% landfill target
  
- **Recommendations:**
  - Redefine the waste hierarchy
  - Set a residual waste target
  - **Change the 10% target to kgs-based target**



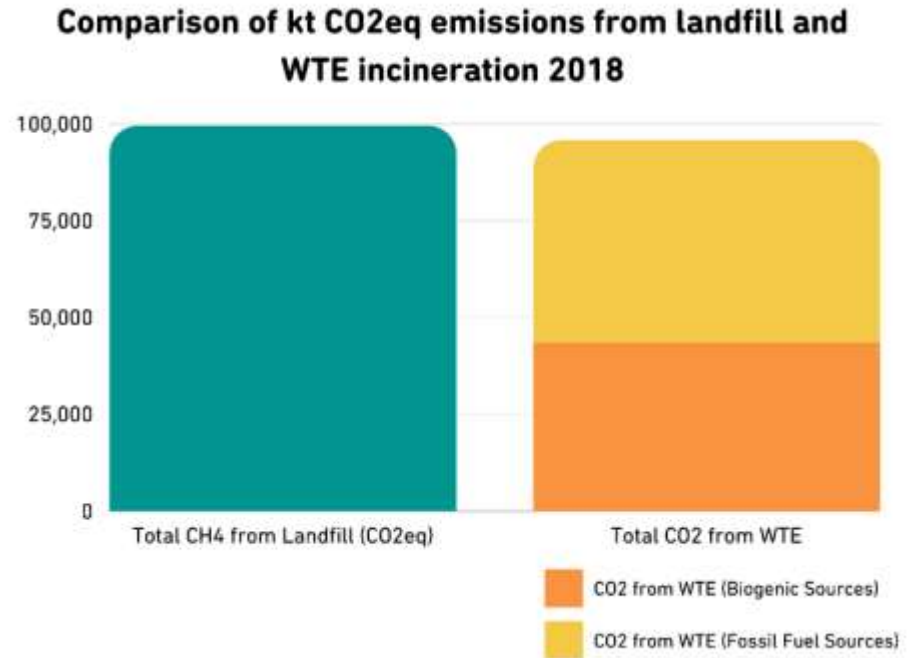
# EU WASTE POLICY

- **European Parliament report on the New Circular Economy Action Plan:**
  - Calls for **minimizing waste incineration**
  - Calls on the Commission to **define a common EU-wide approach for the management of residual municipal waste** ...to avoid building overcapacity of waste incineration at the EU level
  - Calls on the Commission to **propose targets to cap the generation of residual waste**



# EU Climate & Energy Policies – undermines the waste hierarchy

- **Confusing GHG accounting:**
  - Emissions from R1 facilities (WTE) counted under the Energy Sector
- **Often in contradiction with better waste management:**
  - REDII – burning mixed waste indirectly supported
  - ETS – only industrial waste incineration and co-incineration included



# EU Climate & Energy Policies – undermines the waste hierarchy

- **Recommendations:**
  - **Fix the GHG accounting**
  - **REDII should exclude support schemes that undermine the waste hierarchy**
  - **ETS should include municipal solid waste incinerators**



# CONCLUSIONS

## EU FUNDS:

- There is 'de facto' financial moratorium on incinerators
- Avoid false solutions such as CCS

## WASTE POLICY:

- From limiting landfills to limiting residual waste
- Redefine the waste hierarchy and the landfill target to strengthen the waste prevention part

## CLIMATE & ENERGY POLICY:

- Fix the GHG accounting to give visibility to emissions from incinerators
- Align climate and energy policies to phase out support to actions that undermine the waste hierarchy





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# Thank you!

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