











To: Environment Ministers of EU Member States

Berlin, 29 September 2021

## Inclusion of waste incineration in the EU emissions trading system

Dear Minister,

On July 14, the EU Commission presented its plans to expand EU-wide emissions trading. However, CO2 emissions from waste incineration plants are not to be subject to a price. 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 to advocate for the application of the polluter-pays principle and the extension of the European Emissions Trading Scheme (EU ETS) to municipal waste incineration at the upcoming EU Council of Ministers meeting, expected on October 6, 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 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 binding CO2 price for waste incineration, on the other hand, provides economic incentives to prevent waste, improve the separate collection of recyclable materials or even introduce it in the first place, and increase recycling volumes overall. In addition, better technical presorting of mixed waste would be encouraged.

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 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, setting the emission factor at zero for the incineration of organic waste within the ETS (see Annex IV to Directive 2003/87/EC) would not 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 relieving 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 October 6, 2021.

## Yours sincerely,

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