

Brussels, 30 September 2025

To the kind attention of:

Ursula von der Leyen
President of the European Commission

and

The College of European Commissioners

and

National Ministers of Environment of the European Union Member States

Subject: Call for a moratorium on new waste incineration in the EU

Dear President von der Leyen, Commissioners, and National Ministers,

We, the undersigned, call on the European Commission and EU Member States to immediately halt the approval and construction of new waste incineration facilities across the European Union.

The EU already faces an **overcapacity crisis** of municipal waste incineration, estimated at 60 million tonnes.¹ After Europe meets its existing recycling and waste reduction targets, the current infrastructure will, without any doubt, meet all future needs. **Expanding incineration capacity will lock Europe into a burning materials system that directly undermines waste prevention, reuse, and recycling** — the top priorities of the EU waste hierarchy and a circular economy.

Waste incineration is increasingly recognised as a growing climate liability. As documented in recent analysis,² the carbon intensity of energy generated by incineration is higher than that of many conventional energy sources, especially when factoring in the high fossil content of residual waste — largely from plastics. The associated greenhouse gas emissions from incineration, even in energy recovery facilities, directly conflict with the EU's commitments to climate neutrality. Building new incineration facilities now would entrench high-emission infrastructure for decades, making it harder for Member States to meet their climate targets under the EU Green Deal and the Clean Industrial Deal.

¹ The case for a moratorium on incineration (2023)

² <u>Debunking Efficient Recovery: The Performance of EU Incineration Facilities</u> (2023)

Despite improvements in emission controls, growing evidence links waste incineration to serious contamination and potential health harms.³ Contrary to claims that incineration eliminates the need for landfills, up to 16 million tonnes of incineration residues (including hazardous waste) are landfilled annually.⁴ **Communities near incinerators across Europe are exposed to very persistent and toxic pollutants such as dioxins, heavy metals, and PFAS.** These have been found in soil, food, and even human bodies, and are associated with cancer, immune dysfunction, and developmental disorders.⁵ Even legally compliant facilities contribute to repeated, long-term, and cumulative toxic exposures that threaten public health, especially among vulnerable populations.

A moratorium on new waste incineration infrastructure would prevent very high construction costs, unnecessarily high emissions, and harmful pollution. It would also support a just transition toward circular economy infrastructure — such as reuse systems, composting, and advanced recycling — delivering far greater climate, health, and economic benefits. It would also help achieve the goal of the Clean Industrial Deal: to make the EU the world leader in the circular economy.

We call for:

- An immediate EU-wide moratorium on new waste incineration facilities (R1 and D10);
- National and EU strategies to phase down existing capacity; along with
- Investment in circular economy infrastructure that supports a climate-safe, environmentally-friendly, and resilient waste management.

We remain available should you require any further information or wish to discuss these recommendations in more detail.

Sincerely.

The signatories

³ Waste Incineration and the Environment (2024), <u>Biomonitoring report in Zubieta, Spain</u> (2025), <u>Biomonitoring report in Paris, France</u> (2025), <u>Biomonitoring report in Harlingen</u>, The Netherlands (2025).

⁴ Incineration residues in the EU: Quantities and fates (2022)

⁵ The health impacts of waste incineration: a systematic review (2020), The life cycle approach for assessing the impact of municipal solid waste incineration on the environment and on human health (2021), Municipal Solid Waste Management and Adverse Health Outcomes: A Systematic Review (2021), Waste incineration and cancer mortality: a longitudinal controlled population-based study (2023), Residential exposure to municipal solid waste incinerators and health effects: a systematic review with meta-analysis (2025)

5R Zero Sprechi Comitato Collesalviamo l'Ambiente

Alianza Residuo Cero Comitato NO quarta linea inceneritore Padova

Amigos de la Tierra Cornwall Waste Forum St Dennis Branch

Arnika - Toxics and Waste Programme Corporate Europe Observatory

Association Green Istria- Udruga Zelena Istra Cyklo Kuchyňa

Association Zeru Frazu Deutsche Umwelthilfe e.V.

Associazione Culturale Pediatri Dorset Climate Action Network

Associazione Culturale Pediatri Društvo Ekologi brez meja

Associazione Forumambientalista ECO EVENTI O.d.V.

Associazione Rifiuti Zero Sicilia EcoDigital

Biedrība "Vides Sardze" (NGO Environmental ECOS

Guard)

Biofuelwatch

Eko-Logiczna Lubelszczyzna
BirdLife Slovakia

EKO-UNIA Ecological Association
Bond Beter Leefmilieu

Environmental association Za Zemiata Bund für Umwelt und Naturschutz - FoE

FKO UDRUGA "NAŠ ZAVIČAJ"

Germany Environmental Investigation Agency

CEE Bankwatch Network EPINE

Center for Environment Errausketaren Aurkako Mugimendua

Centro di Ricerca Rifiuti Zero European Environmental Bureau

CEPTA Everyday Plastic

Changing Markets Foundation Fair Resource Foundation

Child Rights International Network (CRIN) Fare Eco

CI Maksimir for Zagreb Forum Plastikfrei

Cittadini per l'aria onlus Friends of the Earth - CEPA

ClientEarth Friends of the Earth - SPZ, Slovakia

COLLECTIF 3R Friends of the Earth (Cyprus)

Friends of the Earth Cyprus National Society of Conservationists - Friends of the Earth Hungary Friends of the Earth Europe Naturvernforbundet Friends of the Earth Malta NGO Ecopatriotism Fundación Vida Sostenible No Incinerator 4 Horsham Community Group Futuro in Cenere No Plastic In My Sea **Gallifrey Foundation** Noarc21 Générations Futures Nottingham Friends of the Earth Générations Futures Nuovi Orizzonti Ecologici GLOBAL 2000 o.z. SOSNA Green liberty Ocean. Now! GURAS.O.S. OIKOLOGIKI ETAIREIA ANAKYKLOSIS Health and Environment Justice Support Plastic Change Hnutí DUHA - Friends of the Earth Czech Republic Plastic Soup Foundation Humusz Szövetség Polish Ecological Club Pomeranian Branch **ISDE** Polish Zero Waste Association KlimaDocs e.V. Priatelia Zeme-CEPA Klimatická koalícia - Climate Coalition Public Environmental Center for Sustainable (Slovakia) Development Komitet społeczny STOP wrocławskiej spalarni Reading Against the Incinerator Krizni Eko Stozer Mariscina rehab republic e. V. (Zero Waste München) Réseau Environnement Santé Kyoto Club Legambiente arca di noè della saccisica Reset Livorno ODV Les Amis de la Terre - Belgique asbl Residents Against Preston Incinerator Rete Tutela Roma Sud e Castelli Romani Mallusk Community Action Group Milieukontakt Albania Rethink Plastic alliance

Retorna

Montpellier Zéro Déchet

Rifiuti Zero Piemonte – Zero Waste Piemonte Zelena akcija

Rinascimento Green ZERO - Association for the Sustainability of the

Earth System

Rufiuti Zero Abruzzo

Zéro Déchet Cébazat et Alentours Shireoaks and Rhodesia Against Plastic

Pyrolysis (SRAPP) Zéro Déchet Dordogne

Skalica je pjekné mjesto Zéro Déchet en Mayenne

Società cooperativa di mutuo soccorso Zéro Déchet Lyon

Spolek T.G.M. novevrato.cz Zéro Déchet Pays Dacquois

Stop Incineration North East (SINE)

Zéro Déchet Saint-Étienne

Stop Ratcliffe Incinerator Zéro Déchet Strasbourg

Stop the Edmonton Incinerator Now! StEIN! Zero Waste Austria

Stop the South London Incinerator Zero Waste Bad Vilbel e.V.

Surfrider Foundation Europe Zero Waste Bordeaux

TAT Montefoscoli Zero Waste e.V.

The Scarab Trust Zero Waste Estonia SA

Towarzystwo na rzecz Ziemi Zero Waste Europe

Training and consulting center E-Circular Zero Waste France

Trash Hero World Zero Waste Germany

United Kingdom Without Incineration Network Zero Waste Italy

(UKWIN)

Zero Waste Itzehoe e. V. Unverpackt e.V. – Verband der

Unverpacktläden Zero Waste Kiel e.V.

VšJ "Žiedinė ekonomika" Zero Waste Köln

We say No Zero Waste Latvija

Westbury Gasification Action Group / No Zero Waste Lombardia

Westbury Incinerator

Zero Waste Marseille

WisWin

Zero Waste Montenegro Za Zemiata/FoE Bulgaria

Zero Waste Nederland

Zero Waste Pays d'Auray

Zero Waste Romania

Zero Waste Toulouse

Zero-Waste Haute-Vienne

Znepokojené matky