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ASSOCIATION OF CITIES AND REGIONS FOR SUSTAINABLE RESOURCE MANAGEMENT

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ACR+ position on the Commission guidance document relating to the Renewable Energy Directive

Through its waste legislation and circular economy strategy, the European Union intends to secure environmentally sound management of waste together with a sustainable materials management policy, focusing on closing material cycles and bringing about a sustainable production and consumption model.

One of the key elements to achieve it is the waste hierarchy where prevention of waste should always be prioritized, followed by reuse, recycling and if no other solution incineration and landfilling. Therefore, the primary purpose of waste incineration plants is and must always be to provide a public service by safely treating non-recyclable waste. All Member States or regional authorities must have an objective to reduce non-recyclable waste and not to burn more waste simply to produce more heat to feed our energy market.

The reason is triple: waste incineration, while producing energy, is not a sustainable or clean solution, let alone renewable[1]. Waste incineration emits greenhouse gases and pollutants, impeding progress towards the EU climate and zero pollution targets. Waste incineration disincentivizes waste prevention, reuse and recycling, by requiring a constant quantity of waste to be delivered over their 20 to 30 years of lifetime. In the future, the European Commission might consider limiting the inclusion of heat from waste incineration as residual heat (and ultimately in the fulfilment of the renewable energy targets).

That is why ACR+ is of the opinion that:

- for existing waste to energy infrastructures (especially those contributing to district heat networks), the heat produced can be considered as renewable energy if unavoidable, being a by-product, coming from an industrial or power generation installations and otherwise being dissipated/unused, as mentioned in the Commission's guidance document. It is paramount that Member States consider how to reach the EU Renewable Energy 2050 objective without relying on the percentage originating from waste-to-energy plants. Without such a strategy, the zero pollution and decarbonization at horizon 2050 will not be reached.
- for new waste-to-energy infrastructures, the heating / energy produced should not be considered as renewable energy. We need to keep in mind that the expansion of incineration infrastructure perpetuates reliance on waste as a fuel source, hindering investment in genuinely renewable sources.

ACR+ firmly believes that focusing on genuine renewables alongside a strong implementation of the waste hierarchy, with prevention, reuse, and recycling at the forefront, represents the most effective strategy for achieving a truly circular economy, sustainable resource management, and preserving our planet's and human's health.

[1] According to UNEP, the waste incineration process generates 1.2 tonnes of CO2 for every tonne of waste incinerated. This makes incineration carbon-neutral only if the produced energy is substituted to a more carbon-intensive energy source. 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. Therefore, when considering emissions from non-fossil CO2 generated during waste incineration, the situation worsens, effectively doubling emissions for both electricity and gas.