

Webinar: Waste-to-Energy: an essential element for a Circular Economy?

Presentation: Zero Waste Europe's perspective on managing residuals

Waste incineration and Taxonomy

- Incineration = with or without energy recovery (Art 3 point 40 of <u>Industrial</u> <u>Emissions Directive</u>)
- <u>Taxonomy Regulation</u> → considers increase in waste generation as, with the exception of the incineration of non-recyclable hazardous waste, as harmful to the circular economy (as per Article 12(d))
- Technical Expert Group's (TEG) <u>Final Technical Report</u> → refers to Taxonomy regulation for not including waste incineration
- Commission guidance on RRF → Example 3: Waste incinerator (example of noncompliance with DNSH)

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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
- 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?

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.

Example of noncompliance with

DNSH

Zero Waste Hierarchy







Thank you!

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