



**European Committee  
of the Regions**

**ENVE-VI/023**

**126th plenary session, 30 November-1 December 2017**

## **OPINION**

### **The role of waste-to-energy in the circular economy**

#### THE EUROPEAN COMMITTEE OF THE REGIONS

- is convinced that local and regional authorities have a key role to play in achieving the EU's common waste management objectives, particularly when it comes to the management of municipal waste, as they are the ones who will have to implement the decisions taken and the great diversity of situations precludes a one-size-fits-all solution;
  - calls on the European Commission to ensure that the Member States involve local and regional authorities closely in drawing up the strategy, adopting the necessary technical and fiscal measures, developing the financial support mechanisms, and exchanging good practices;
- considers it essential for financial support at all levels to be in line with the waste hierarchy and, as far as possible, to be redirected towards prevention, public information, high-quality separate waste collection schemes and the development of reuse and recycling infrastructure, as well as towards research and innovation in the field; waste and the income generated should ideally be used to develop local public services and reduce their cost.

Rapporteur

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Reference document

Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the European Committee of the Regions – The role of waste-to-energy in the circular economy  
COM(2017) 34 final

## **Opinion of the European Committee of the Regions - The role of waste-to-energy in the circular economy**

### **I. POLICY RECOMMENDATIONS**

#### THE EUROPEAN COMMITTEE OF THE REGIONS

##### General comments

1. reiterates that the waste hierarchy is a key principle in the circular economy, and agrees that energy recovery processes can contribute to the transition to a circular economy, provided that the solutions chosen do not hamper efforts to achieve higher levels of waste prevention and recycling and of product reuse;
2. reiterates that, in order to achieve the ambitious goal of a fully circular economy, the political will to take the necessary steps is vital at all levels, as are long-term changes in public opinion and consumer behaviour and the creation of a stable market for products and materials based on secondary raw materials;
3. reiterates that, under certain conditions, the conversion of unavoidable, non-recyclable waste to energy in high-efficiency incineration plants forms an integral part of the circular economy and that in many Member States and regions it plays an important role in reducing landfilling significantly in the near future. Waste-to-energy also contributes to energy supply;
4. highlights that waste-to-energy planning must also be based on the waste hierarchy established by the EU, on minimising the volume of waste and on life-cycle considerations, and that, with regard to the circular economy, it is imperative to avoid a shift away from models based on high levels of recycling towards energy recovery, and therefore to avoid designing such installations with too great a capacity. It should be stressed, however, that only recyclable waste should be circulated, and that the dumping of residual waste in landfills is purely a last resort. Therefore, energy recovery should be prioritised over landfilling;
5. warns that the full and correct implementation of existing European legislation on waste is of utmost importance in order to create a level playing field for waste management throughout Europe;
6. calls on all levels of government in the Member States to make every effort to reduce the quantity of waste landfilled and non-recoverable waste to be incinerated (particularly when this does not result in energy recovery), paying particular attention to waste prevention, the development of separate collection systems, and investment in activities ranked higher in the waste hierarchy;
7. notes that there are huge differences between European regions with regard not only to the volume of municipal waste but also to how it is treated. Certain regions are already exceeding EU waste targets without using energy recovery, while others have not achieved the minimum

targets set. This shows that similar systems may lead to very different final results, and that local commitment to achieving the targets is of paramount importance;

8. points out that the waste hierarchy is a cornerstone of EU policy and legislation on waste and a key to the transition to the circular economy. Its primary purpose is to establish an order of priority that minimises adverse environmental effects and optimises resource efficiency in waste prevention and management;
9. stresses that the sizeable disparities between Member States and regions in terms of their waste-to-energy situations and capacities mean that the most appropriate methods of achieving the general objectives may also be very varied, and therefore that a one-size-fits-all approach should be avoided;

#### Separate collection of waste

10. points out that biowaste makes up a significant proportion of household waste volumes, and that more attention should be paid to increasing biowaste recycling rates, for example by means of processes such as anaerobic digestion of clean and properly sorted biodegradable waste, which combines materials recycling with energy recovery. Biowaste should be collected on the basis of local and regional conditions, and there should be scope for development and innovation in this task. It is therefore important for waste collection to be organised in line with local views on how best to meet the recycling targets set out in the Waste Framework Directive, rather than by imposing collection methods on local and regional authorities;
11. considers that, in view of the different levels of development of the regions of the EU and the relatively high costs of implementing ever more sophisticated recycling and energy recovery systems, it would be a good idea to seek ways of increasing funding for activities of this kind. This is in the interests of the citizens of all Member States;
12. draws attention to the fact that many regions, despite having a high level of separate collection, do not have a proportionally high level of recycling, and that specific policy instruments should therefore be developed to remedy this discrepancy, it being particularly important to lay down rules for promoting the use of secondary raw materials within an appropriate framework for price competition regarding original raw materials;
13. supports the expansion of waste sorting and recycling mechanisms that leave high-quality waste with few contaminants. Other methods may also be used, such as replacing fossil fuels with fossil fuel residues in combustion plants that produce cement and lime, anaerobic digestion of biodegradable waste, or producing waste-based fuels. However, the construction of new incineration capacity is a complementary solution that should be used in order to prevent new landfills from being created in areas with low waste incineration capacity. This brings a greater benefit to the environment as a whole. However, these incineration plants must go hand in hand with energy recovery;

## Incineration capacity

14. recognises that the transition to a circular economy requires the right balance being struck in terms of waste-to-energy capacity when planning the treatment of non-recyclable waste, in order to avoid potential economic losses or the creation of infrastructure barriers to achieving higher recycling rates;
15. points out that with a view to the circular economy, incineration capacity must factor in the distance that waste must travel for disposal as well as parameters such as: distance from other waste sorting and processing centres (and their catchment areas), the number of residents in the catchment area, the quantity of waste produced and forecast trends in these parameters, in order to make it possible to minimise further harm to the environment;
16. draws attention to the fact that the evaluation and planning of incineration capacity should not be based solely on municipal waste, as a large proportion of the inputs used for energy recovery come from other sources of waste;
17. considers that the Commission's recommendations are unfortunately solely focused on waste incineration overcapacity, as the high level of waste landfilling in the EU demonstrates that under capacity is also a problem that needs to be addressed. To reduce the quantity of waste, it is important to have clearer rules on reuse and recycling and to promote the use of recycled materials in the manufacturing sector, while also giving consideration to removing harmful substances from circulation;
18. shares the European Commission's opinion that, although waste-to-energy plays an important role in avoiding landfilling in a number of Member States, waste incineration overcapacity is liable to lead to technology lock-in, which could hamper the achievement of waste management objectives;
19. suggests improving energy efficiency percentages to optimum levels for older, less efficient waste incineration plants, to support European Union energy self-sufficiency and reduce consumption of non-renewable fossil resources. In the event that such an improvement is not possible from an economic and technical point of view, those plants that do not adapt should be decommissioned and support mechanisms phased out, particularly in Member States with overcapacity;
20. recommends that Member States with little or no incineration capacity should focus their efforts on developing the separate collection and recycling of waste – whereby source-separated collection should be encouraged, as it is vital for the provision of high-quality waste with a high recycling value – and should only expand their use of energy recovery in the context of very careful planning, taking account of the fact that this is mainly a temporary and transitional solution in the context of moving from a system based on landfill to another method, the ultimate objective of which is recycling;
21. is in favour of shipments of waste between Member States and between regions for energy recovery purposes in order to avoid or reduce landfilling and in view of the fact that they help to

make better use of existing incineration capacity. This complements national and regional approaches. The Committee also considers it necessary for fairness and solidarity aspects to be taken into account when assessing the merits of shipments of waste between Member States, in order to ensure that the countries and regions concerned can reap the environmental, economic and social benefits of this activity on an equal basis;

#### Economic and social impact

22. draws attention to the enormous differences between Member States and regions as regards the per capita quantity of municipal waste, which in some countries is more than double that of other countries. There may be several reasons for these differences, with lower quantities being attributable to responsible consumption or to poverty, depending on location. Waste strategies must take account of all these aspects, inasmuch as very different kinds of policy instruments and support mechanisms may be similarly effective in achieving the objectives set;
23. highlights the fact that, in certain regions, people's use of waste in individual domestic heating stoves is a major problem that is partly linked to energy poverty and partly to negligence and lack of awareness regarding the harm caused, and that, unlike specialised incineration plants with proper filtration systems, this practice is causing major environmental damage and presents significant risks for public health, as well as being incompatible with the basic conditions for social integration. The Committee therefore urges the European Commission also to incorporate efforts to combat energy poverty into activities relating to waste-to-energy and to adopt strategies to raise awareness of the harm done by using waste as fuel for domestic heating;
24. it is important to clarify how, and by whom, waste management costs are to be borne, given that in a number of Member States they already present a disproportionate burden compared with household income. It will therefore be necessary to monitor the economic and social impact closely. This situation is a particular problem for many islands and outermost regions, especially those which are overpopulated and under tourist pressure;

#### Policy implementation tools

25. points out that local and regional authorities have a key role to play in achieving the EU's common waste management objectives, particularly when it comes to the management of municipal waste, as they are the ones who will have to implement the decisions taken and the great diversity of situations precludes a one-size-fits-all solution;
26. highlights the importance of investments channelled through EU financing mechanisms, such as the European Fund for Strategic Investment (EFSI), and in particular their role in attracting private financing to the best and most "circular" waste management methods. The Committee also appreciates the support that helps bring to the market advanced energy-efficient technologies, developed in part thanks to research and innovation programmes;
27. calls on the European Commission to ensure that the Member States involve local and regional authorities closely in drawing up the strategy, adopting the necessary technical and fiscal measures, developing the financial support mechanisms, and exchanging good practices;

28. points out that it is essential for civil society organisations and the population concerned to be involved, in order to foster the sense of environmental ownership among citizens and, for the right decisions to be made and implemented effectively; recommends that the Member States set the clearest possible priorities for waste management, thus ensuring close cooperation between all those involved in the waste management system. Cooperation and transparency in waste management are crucial in this regard;
29. considers it essential for financial support at all levels to be in line with the waste hierarchy and, as far as possible, to be redirected towards prevention, public information, high-quality separate waste collection schemes and the development of reuse and recycling infrastructure, as well as towards research and innovation in the field; waste and the income generated should ideally be used to develop local public services and reduce their cost;
30. calls on the European Commission to support the existing platforms for pooling experience, transferring knowledge and exchanging experience in the field of waste-to-energy, disseminating tried-and-tested solutions and providing related technical and financial assistance, in view of the fact that many local and regional authorities have taken a variety of initiatives to promote the efficient use of resources and to support the circular economy, which could serve as models for others;
31. calls on the European Commission to work closely with the CoR to support the exchange of good practices between cities and regions in order to find better solutions regarding, for example, district heating and cooling systems, problems with sorted waste rejected by recycling companies, and how to raise public acceptance of household waste sorting, in view of the fact that these good practices could encourage greater ambition in the development of waste management systems;
32. draws the European Commission's attention to the fact that the precondition for appropriate regulation and sound decision-making is the availability of reliable, comparable data that reflects reality, which is currently not fully guaranteed, particularly with regard to non-municipal waste;
33. highlights the importance of taking account of cultural and economic differences between Member States and regions when drawing up policies designed to change people's behaviour as regards the sorting of waste at source. It should also be noted that island and rural authorities have specific geographical needs and delivery challenges;

34. proposes that the European Commission, Member States, and local and regional authorities as the political levels closest to the general public, should take education and training measures to significantly improve the public's and economic operators' knowledge and awareness of sustainable consumption, waste reduction, the protection of natural resources and the environment, producer responsibility and the design of products and advertising, for example by including these issues in educational programmes and information campaigns (which could be realised through social media promotion, school visits, public events, press campaigns etc.).

Brussels, 30 November 2017

The President  
of the European Committee of the Regions

Karl-Heinz Lambertz

The Secretary-General  
of the European Committee of the Regions

Jiří Buriánek



## II. PROCEDURE

<b>Title</b>	The role of waste-to-energy in the circular economy
<b>References</b>	COM(2017) 34 final.
<b>Legal basis</b>	Optional referral, Article 307(1) TFEU
<b>Procedural basis</b>	Rule 41(a) of the Rules of Procedure
<b>Date of Council/EP referral/Date of Commission letter</b>	17 February 2017
<b>Date of Bureau/President's decision</b>	20 February 2017
<b>Commission responsible</b>	Commission for the Environment, Climate Change and Energy (ENVE)
<b>Rapporteur</b>	<b>Kata TÜTTŐ</b> (HU/PES) Councillor, District 12, Budapest
<b>Analysis</b>	23 May 2017
<b>Discussion in commission</b>	18 September 2017
<b>Date adopted by commission</b>	18 September 2017
<b>Result of the vote in commission (majority, unanimity)</b>	Majority
<b>Date adopted in plenary</b>	30 November
<b>Previous Committee opinions</b>	Opinion on An EU action plan for the Circular Economy, COR-2016-01415-00-01-AC-TRA <sup>1</sup> Opinion on Legislative proposals amending waste directives, COR-2016-00585-00-02-AC-TRA <sup>2</sup>
<b>Date of subsidiarity monitoring consultation</b>	n/a

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<sup>1</sup> [OJ C 88, 21.3.2017, p. 83.](#)

<sup>2</sup> [OJ C 17, 18.1.2017, p. 46.](#)