

TIME TO ENSURE SUSTAINABLE WASTE SHIPMENTS IN FUROPE

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Harmful treatment of waste outside of Europe cannot be accepted. Europe needs to further support internal and sustainable waste treatment practices.

A striking increase in waste generation caused by economic growth and globalisation over the past decades has been accompanied by an increase in global waste trade.

However, exports of waste to non-European countries, in particular non-OECD countries where environmentally sound waste management is often uncertain, have pushed the waste issue out of sight and failed to properly address it.

Repeated abuses in international waste shipments have highlighted the need for Europe to take care of its own waste, under EU environmental standards.

To this aim, ESWET welcomes the Commission's initiative to carry out a revision of the Waste Shipment Regulation in the wake of the European Green Deal.

ESWET recommendations

ESWET calls the European Commission to:

- Adopt a **proximity approach** to waste export, maintaining EFTA countries as a preferential partner.
- Keep the Waste Shipment Regulation flexible enough to ensure the **synergy of the waste hierarchy**: every level has a role to play in the circular economy for the safe management of waste.
- Further reduce the flow of waste shipped outside of the EU, as sound waste management is often uncertain in non-OECD countries.
- Support the creation of a **functioning market for secondary raw materials** recovered by the recycling industry and Waste-to-Energy plants.

Implementing a proximity approach

ESWET calls for the Commission to favour a proximity approach. Instead of burdening developing countries with our waste, shipment of European waste should be treated as much as possible within the boundaries of the European Union and EFTA countries.

Due to their geographical proximity and their significant integration with the Single Market, EFTA countries and the UK are the best complement to European Union's waste management system. We firmly believe that if the European Union wants to lead the way to a greener future, it must take responsibility for its own waste rather than making it somebody else's problem.

The role of the Regulation is to facilitate safe shipments of waste

ESWET also calls for a revision of waste shipment rules that embraces the logic of the waste hierarchy of the Waste Framework Directive. This logic is not about banning a given option but to ensure a synergy between the different levels of the waste hierarchy, in such a way that every waste stream finds its more sustainable treatment option.

While specific regulations define the waste hierarchy and related targets, the role of the Waste Shipment Regulation's mission is to create a framework for the safe shipment of waste and certainly not to make it impossible for waste to be treated a certain way.

In particular, it is crucial not to overlook the treatment of non-recyclable waste (the so-called "residual waste") in the revision of the Waste Shipment Regulation.

While reuse and recycling should be a go-to option for waste treatment, a significant amount of waste is not recyclable: either because it would pollute the recycling stream; because it is too degraded to be recycled once more; or because it is not technologically, economically or environmentally feasible.

Waste-to-Energy is necessary in the Circular Economy

As acknowledged by the Commission¹, Waste-to-Energy has a role to play in the circular economy. Its complementarity to recycling has been stressed by the recycling industry itself². It is Waste-to-Energy's primary mission to safely treat³ non-recyclable waste by taking the pollutants out of the eco-cycle and by reducing the volume of waste by over 90%.

Unlike other options which can only cope with a very limited type of non-recyclable waste (like co-processing in cement kilns), Waste-to-Energy is able to generate

¹ The role of Waste to Energy in the Circular Economy, COM(2017) 34

² EuRIC Statement on issues stemming from the lack of capacity for ultimate residual waste

³ In line with the stringent requirements of the EU Industrial Emissions Directive.

energy out of municipal waste in general, thus providing the community with electricity and heat while treating its non-recyclable waste.

In addition, Waste-to-Energy plants also recover ferrous and non-ferrous metals from the combustion process, thus securing secondary raw materials and avoiding energy-consuming extraction of further raw materials⁴.

This is all the more important at a time where access to resources is a strategic security question for Europe's ambition to deliver the Green Deal⁵.

Treatment of non-recyclable waste cannot be left aside

It is important for waste shipment rules not to hinder energy recovery from non-recyclable waste as it would leave disposal as the only alternative for this waste. Nonetheless, waste shipments to disposal operations should not be banned altogether as they are necessary to deal with the ultimate fraction of waste that cannot be either recycled or recovered.

The issue of non-recyclable waste treatment should not be overlooked. As waste generation is growing, the need in non-recyclable waste treatment capacity is expected to significantly increase as well⁶, and not all countries will be equally equipped to cope with it⁷.



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ESWET is a European association representing the European suppliers of Waste-to-Energy technologies, committed to foster the development and dissemination of Waste-to-Energy at the European level. ESWET also seeks to raise the awareness of the positive implications of the technology in terms of better waste management, energy and for the environment.

⁴ As underlined in the European Green Deal, page 7, the constant increase in global extraction of materials poses a major global risk and is responsible for significant greenhouse emissions, water stress, and most of biodiversity loss

⁵ The European Green Deal, COM(2019) 640 final, page 8

⁶ CEWEP's peer-reviewed Circular Economy calculation tool

⁷ For instance, given their geographical constraints and limited resources, waste management in island States often relies on international waste shipments.