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Biogenic emissions from Waste-to-Energy plants should be part of the carbon removal certification

ESWET welcomes the European Commission's proposal on the certification of carbon removal and would like to highlight that Waste-to-Energy should be included because of its share of biogenic emissions.

The primary function of Waste-to-Energy plants is the safe treatment of non-recyclable waste, meaning there is no option for the sector to switch fuel. Therefore, the implementation of Carbon Capture, Utilisation and Storage (CCUS) technologies represent a significant opportunity for the sector to decarbonise itself.

The certification of carbon removals as proposed by the Commission is a positive first step in the deployment of the full CCUS value chain in Europe. Offering clear definition of "carbon removal" is essential in developing a comprehensive framework, which can also facilitate the monitoring of the removals.

Due to the heterogenous nature of its feedstock, Waste-to-Energy emits approximately 50% of biogenic CO₂, but this share can be higher depending on the region, time period, etc. As such, **carbon removals from Waste-to-Energy plants partially fit under the proposed definition** by the Commission. However, to guarantee certifications of removals of CO₂ from installations, it is important to have clear rules for monitoring and accounting of emissions that will reflect the particularities of this sector.

Moreover, as monitoring requirements to be decided under the Carbon Removal Mechanism can potentially overlap with the EU Emissions Trading System (ETS), the articulation between the two systems has to be carefully designed.

In addition, the Delegated Acts that will establish certification methodologies should consider the particular features of Waste-to-Energy plants.

ESWET deems that recognising the storage of CO₂ in "long-lasting products and materials" is a good start, however it is essential to acknowledge the full spectrum of the utilisation of biogenic CO₂, such as the direct use in greenhouses to substitute fossil CO₂, the utilisation in the chemicals sector, and promising technologies like mineralisation. The full contribution of carbon utilisation to the circular economy should not be overlooked.

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