Waste-to-Energy in the EU

Challenges and global perspectives on climate change, circular economy and waste management

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Representing owners and operators of WtE plants (public & private) since 2002

CEWEP members:

83 M tonnes, 419 plants in 24 countries

Total in Europe: 100 M tonnes, 498 plants



CONFEDERATION OF EUROPEAN WASTE-TO-ENERGY PLANTS

Waste-to-Energy in Europe in 2022

- Number of WtE Plants operating in Europe (not including hazardous waste incineration plants):498
- Residual waste thermally treated:100 Million tonnes

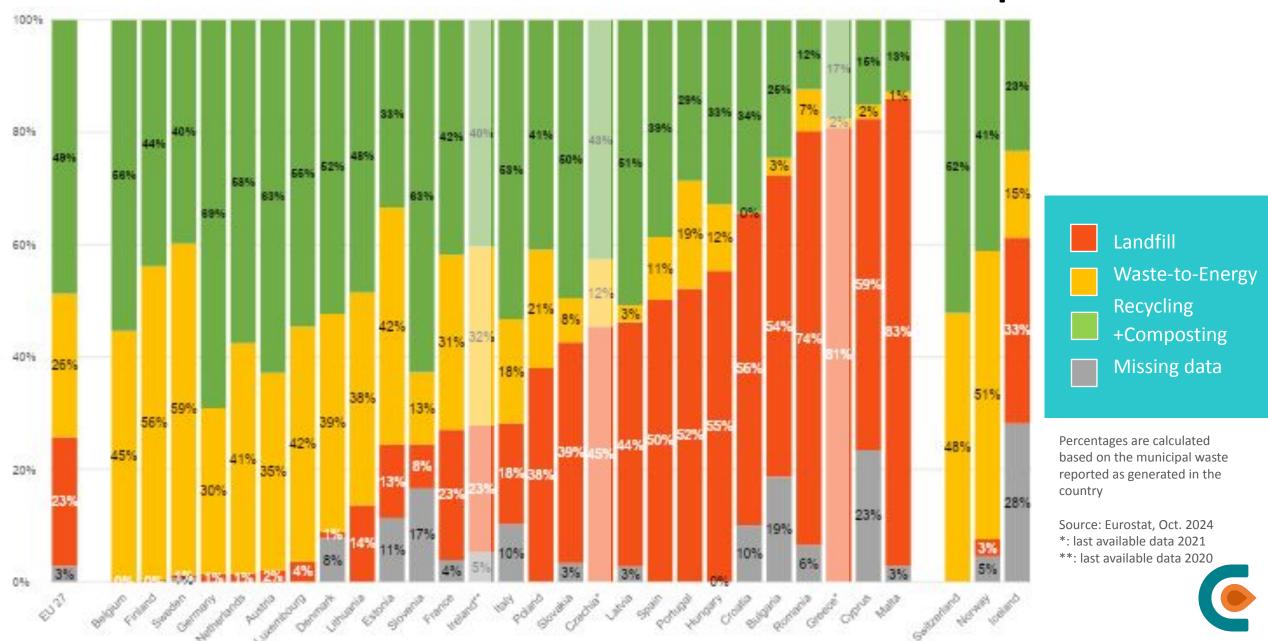
Data supplied by CEWEP members and national sources

^{*:} Includes plant in Andorra and SAICA plant





9 Member States landfill over half of their municipal waste



WtE plays a role in

Waste management

help divert waste from landfills; WtE complements recycling; hygienic task

- Energy generation affordable + secure energy
- Material recovery

recovery of metals and minerals from bottom ash

Decarbonisation

replace fossil fuels; CCUS where feasible

contributing to the EU targets



WtE: Aligned with the new Commission's key targets

Competitiveness

- Support industry in implementing Green Deal
- Energy security + low price + technology neutral
- Also through circularity (Draghi report)

Implementation

- Make it simple, regular checks with stakeholders
- Waste legislation: to keep resources in the EU

Decarbonisation

- Committed on the target
- Technology-neutral



Clean Industrial Deal

Strategy to support EU industry and defend EU competitiveness

• Central to the Commission's work until 2029

Six areas, including

- Affordable energy (Action Plan for Affordable Energy)
 - Mentions <u>encouraging better use of process heat</u>
 - Lowering energy costs, heating and cooling strategy, attracting investments, crisis readiness

Lead markets

- "building a business case for permanent carbon removals" and developing measures "to acknowledge the use of captured carbon in a wider range of products, and "prevent double counting of embodied carbon emissions, should waste incineration be included in the ETS"
- Financing: Clean Industry State Aid Framework
- Circular economy
 - Circular Economy Act Q4 2026



Circular Economy Act

Scheduled for Q4 2026

- Presented as central for decarbonisation and reducing dependencies
- Focus on the market for secondary raw materials and waste
 - Higher supply of high quality recyclates
 - Stimulate demand for secondary raw materials
 - Harmonising definitions of end-of-waste
 - Measures to incentivise diversion from landfill towards re-use and recycling through more effective separate collection

In practice

- Revision of Waste Framework Directive and Landfill Directive
- Focus on market = not a deep revision
- EP and Council can still propose amendments outside the scope proposed by the Commission



Revision(s) of the WFD and Landfill Directive

Latest WFD (small review): targeted on textiles and food waste

- Agreement reached on 19th February 2025
- Requires evaluation of WFD + LD by 31 December 2029
- Assesses "the possibility of introducing prior sorting of mixed municipal waste to prevent waste which can be recovered for preparing for reuse or recycling from being [sent] to waste incineration or landfilled."

Indicative timing of revisions

Textiles and Food Waste
Publication Q2/Q3 2025
Transposition by Q2 2027

Circular Economy Act

Proposal in Q4 2026
Agreement 2028
Publication 2028/2029
Transposition 2031

Large WFD/LD revision

Proposal Q4 2029
Agreement 2032
Publication 2032
Transposition 2034



Waste & EU ETS



EU ETS Timing set in revised ETS Directive

Monitoring, Reporting,
Verifying
1st January 2024

Commission Impact
Assessment
(+ legislative proposal)
31st July 2026

Inclusion of other sectors
(WtE+ others, e.g.
landfills)
1st January 2028

(Based on the results of the impact assessment)



WASTE & EU ETS - CEWEP'S MAIN CONSIDERATIONS

WtE sector taking its responsibility for CO2 emissions. What is the best way to do this?

A possible inclusion of the waste sector in EU ETS should incentivise high environmental performance (in line with the waste hierarchy) – Not the opposite

- 1. Avoid waste leakage to unsustainable routes, like:
- a) Export to other countries outside the EU with lower costs but also lower climate/environmental/social standards
- b) Illegal routes favouring the infiltration of criminal activities
- c) Diversion of waste to treatment that is cheaper, but lower in the waste hierarchy than material and energy recovery
- 2. Consider higher social costs for municipalities and the whole waste management chain, incl. Recycling.
- 3. No empirical evidence that the inclusion of WtE will foster recycling and separate collection.
- 4. The EU ETS may limit waste acceptance in WtE plants, especially of those streams & U & P containing plastic waste ("Blacklisting"). Where will these waste streams go to?

Policy Brief | Recommendations before pricing carbon in Waste Management

- ☐ The Impact Assessment must be holistic for the waste sector as a whole
- The Impact Assessment must interlink Environmental & Climate legislation: Landfill rates are still very high in some MS
- Multiple Taxation of WtE in the EU should be avoided
- How to ensure Polluter-Pays-Principle? Plastic producer responsibility: EPR Schemes
- WtE offsets its fossil CO2 emissions and contributes to decarbonization targets already today:
 - **CEWEP Climate Roadmap**
- ☐ CCUS is a concrete vision, but it is not a silver bullet for the WtE sector:
 - Limitations: Need for space, Energy penalty, Time for implementation, Lack of business models, High Costs, Lack of CO2 infrastructure, Lack of a solid regulatory framework
- The elephant in the room: Diverting recoverable waste from landfills to higher steps in the waste hierarchy such as recycling & WtE can significantly cut methane emissions and yield greater CO2 equivalent savings than carbon capture technologies or what a strong CO2 price can achieve encourage (study Prognos; CE Delft)

Waste sector has huge potential for climate mitigation

- Study by Prognos and CE Delft (2022) examined the CO2eq reduction potential of the European waste management sector for EU27+UK.
- Saving of 150 Mt CO2eq annually: applying current EU waste laws and the same recycling and landfill targets as set for Municipal waste to Industrial and Commercial waste by 2035.
- Saving of 296 Mt CO2eq annually: With more ambitious recycling targets and diverting waste that can be used for material or energy recovery from landfills.



Let's not waste our resources!

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