

21 September 2020

FEAD feedback to the EC Roadmap on the Revision of Directive (EU) 2018/2001 on the promotion of the use of energy from renewable sources

FEAD, the European Federation for Waste Management and Environmental Services, representing the private waste and resource management industry across Europe **welcomes** the European Commission's initiative to review the **2018 Renewable Energy Directive (REDII)**. Private waste management companies have a key role to play on the renewable energy production.

FEAD deems that **option 5 of the Inception Impact Assessment** of the Roadmap (excluding the revision of sustainability criteria for biomass) is the way forward to achieve the decarbonisation of the energy sector, provide secure and affordable energy, promote synergies between sectors, enable new investments and create economic growth and jobs, in line with the EGD and the new Circular Economy Action Plan (CEAP). FEAD is in line with the proposed idea of a combination of non-regulatory measures, higher ambition levels and (climate) targets, and amendment of REDII to translate into legal measures the actions proposed in other European Green Deal (EGD) energy strategies.

FEAD considers that such a holistic review of REDII will allow to combine and optimise the different energy systems (e.g. electricity, gas, liquid fuels, and heat) and energy-related sectors (transport, heating and cooling in industry and buildings) across Europe, and it should work together with other legislative tools, in particular the soon-to-be-revised Energy Taxation Directive and the CEAP, and increase the energy efficiency, while boosting the circular economy in the Union.

Waste management activities are critical in this regard, however there are still challenges that must be overcome. The proposed initiative can allow for the elimination of the market barriers for the use of alternative fuels and energy that derive from waste and can help gradually evade the use of fossil fuels. The reviewed REDII should encompass a full chapter on closing the loop and make the energy sector more circular, by including in its scope the energy from waste, which is a renewable source of energy with low carbon footprint.

FEAD key priorities:

- Acknowledging the positive role that waste management activities have in avoiding CO₂ emissions in the overall energy sector.

APOH, Slovakia

BDE, Germany

ESA, UK

FLEA, Luxembourg

HRABRI ČISTAČ,

NORSK INDUSTRI,

SRI,

ARMD, Romania

CAObH, Czech

EWMA, Estonia

FNADE, France

IWMA, Ireland

PASEPPE, Greece

VOEB,

ASEGRE, Spain

DWMA, Netherlands

FISE, Italy

go4circle, Belgium

LASUA, Latvia

PIGO, Poland

YTP,

Finland

- Allowing renewable energy derived from waste to be placed in the market, at competitive prices and acknowledging recovering waste heat and energy from waste in general as virtuous and alternative to fossil fuel.
- Designing the Directive in such a way so that its implementation in a homogeneous way in the whole EU economy is ensured, in order to avoid market-handling variations between EU Member States.

Pursuant to the present initiative, low-carbon fuels resulting from waste should be positively treated in the EU energy market compared to fossil fuels, as they avoid the consumption of fuels with a higher carbon footprint. This requires that the proposed initiative should include waste-based fuels, and its scope should consider the following:

1) Solid Recovered Fuel (SRF) or Refuse Derived Fuel (RDF): waste that cannot be recycled (residues of non-recyclable, non-hazardous municipal or industrial and commercial waste, such as paper, cardboard, wood, textiles, plastic, construction waste, shredding of vehicles, tires, etc.) can be used to produce high-quality, standardised alternative fuels, while reducing the amount of landfilled waste. It is made up of dry, non-hazardous waste which can be recovered through waste to energy plants or on high capacity industrial plants (cement plants). SRF is a virtuous use of residues that would otherwise be lost if incinerated without energy recovery or landfilled and gives to residues an economic value. Recovering the energy content of waste is an essential complement of material recovery and the circular economy.

2) Waste-to-Energy (W-t-E) installations: R1 waste-to-energy installations allow to recover the energy content of non-recyclable waste. The whole recycling process after selective collection results in non-recyclable residues that account for 25% to 30% in average (residues from sorting and residues after sorting). Stronger eco-design rules, waste prevention schemes, will not significantly reduce the amount of residual waste in the next upcoming years. Less landfilling (municipal and industrial and commercial waste) will inevitably be accompanied by an increase of waste-to-energy facilities. Heat from W-t-E installations account for around 50% as renewable (with slightly different percentages in each Member State), due to the organic fraction in municipal waste that ends up in R1 installations. This share is consequently considered renewable energy (biomass) under the Directive on Renewable Energy 2018-2001. A revised REDII should, similarly to SRF, result in acknowledging the positive role of W-t-E in avoiding the use of fossil fuels when producing heat/electricity. FEAD very much supports the need that Waste-to-Energy activity be included in the EU taxonomy for sustainable activities. Besides, the European Commission¹ has recognised the potential and need for energy recovery from waste. Finally, R1 Waste-to Energy installations are an important component to efficient district heating and cooling networks, with a view to the 2050 carbon neutrality target.

¹ <https://ec.europa.eu/environment/waste/waste-to-energy.pdf>



3) Waste heat recovery: waste heat, also known as “excess heat”, is defined in the Renewable Energy Directive 2018/2001 (as “unavoidable heat or cold which is generated as by-product in industrial installations, which would be dissipated unused in air or water without access to a district heating or cooling system”) and can take the form of vapor, hot water, oil or hot air. While it is originally created as an undesired by-product of the operation of a piece of equipment or machinery, or by waste-to-energy plants, as well as by other industrial installations, it can be used to fill a desired purpose elsewhere. Waste heat can become subject to another process to provide clean energy, or it can be used by other economic operators in their commercial or industrial activities, or even to cover domestic electricity demand of end-users. Generally, the EU is losing on energy efficiency by not taking advantage and promoting waste heat recovery, which would help avoid additional energy consumption while at the same time reduce GHG emissions. The revised REDII should promote waste heat recovery.

4) Biomass and waste: Biomass is defined in the Renewable Energy Directive 2018/2001 as “the biodegradable fraction of products, waste and residues from agriculture (including vegetal and animal substances), forestry and related industries, as well as the biodegradable fraction of industrial and municipal waste”. “The key benefit of fuels produced using regenerative energy is clearly a small carbon footprint. Among these fuels, first-generation biodiesel has a relatively low CO₂ reduction potential. However, liquefied methane produced from biomass (biogas) has extremely high CO₂ reduction potential. It should be noted that the main component of LNG is also methane; therefore, both liquefied gases are equivalent.”² Besides, local biomass residues and wastes can also be processed into liquid biomethane to make a closed loop system for remote applications.³ Biogas contributes to the reduction of GHG emissions not just in the energy sector, but also in the sectors of agriculture, transport, industry, and waste management. FEAD proposes that biomass coming from waste should be strengthened in the revised REDII and calls for policy coherence on the matter among REDII and other pieces of legislation, including the Waste Framework Directive, taking into account technology neutrality, waste hierarchy and life-cycle impacts.

² DNV-GL. (June 2019). ASSESSMENT OF SELECTED ALTERNATIVE FUELS AND TECHNOLOGIES. p. 9. Available at: <https://www.dnvgl.com/publications/assessment-of-selected-alternative-fuels-and-technologies-rev-june-2019--116334> ; last accessed on 16/04/2020.

³ IRENA - International Renewable Energy Agency. (2015). RENEWABLE ENERGY OPTIONS FOR SHIPPING - TECHNOLOGY BRIEF. p. 42. Available at: https://www.irena.org/-/media/Files/IRENA/Agency/Publication/2015/IRENA_Tech_Brief_RE_for-Shipping_2015.pdf ; last accessed on 16/04/2020.

