

FEAD feedback on the EC Roadmap on National emissions reduction targets (Effort Sharing Regulation)

FEAD, the European Waste Management Association, represents the private waste and resource management industry across Europe. Private waste management companies operate in 60% of municipal waste markets in Europe, and in 75% of industrial and commercial waste.

Waste management causes a significant reduction of CO₂ emissions **by producing secondary raw materials** used in manufacturing that helps to **minimise resource consumption**, and by **utilising the energy content of residual, non-recyclable waste** to produce heat/electricity. The recovery/recycling process from waste avoids the emissions that would have otherwise been used in extracting and manufacturing raw materials. Waste-to-energy processes avoid the use of fossil fuels and thus significant CO₂ emissions, and ultimately, using environmentally sound disposal ensures the safe treatment of residues that cannot be otherwise recycled or recovered.

Currently, half of greenhouse emissions result from resource extraction and processing¹. Strong recycling policies leading to significant savings in resources and energy, while avoiding CO₂ emissions, can make a significant difference along a product value chain. Favouring recycled materials over raw materials **is the best way** to do this. As a matter of fact, the carbon footprint of recycled PET is 90 % less than its virgin counterpart, for textiles it is 98%, for steel up to 85%, aluminium 92%, paper 18%². As a major accessory for ambitious recycling targets, Waste-to-Energy has a part to play by avoiding CO₂ emissions³ for non-recyclable and residual waste.

The entire waste management chain avoids emissions in much larger quantities than it produces. A more ambitious regulatory framework to boost recycling and recovery, as proposed by the EU Green Deal, would foster a positive contribution by this sector and help deliver the decarbonisation of the European Union and create a more circular economy.

As far as CO₂ emissions are concerned, it is crucial to address the waste management sector as a whole, to reflect the need for an integrated approach-based waste management, to fully take into consideration the waste hierarchy, and to privilege the most efficient regulatory instruments to address the still untapped potential of recycling and recovery.

¹ European Commission (2019). “Communication on the European Green Deal”, p.22.

² According to the Bureau of International Recycling (BIR).

³ https://www.cewep.eu/wp-content/uploads/2019/05/Peer-Review_waste-treatment-need-in-2035.pdf

The Effort Sharing Regulation (ESR), which currently covers the whole waste management sector, will require increased CO₂ emission reduction. Achieved by a set of relevant national measures incentivising waste treatments high up the Waste Hierarchy: regulations, taxation, and public support for investment in selective collection, recycling facilities, and recovery of residual waste.

Achieving the ESR goals in our sector implies Member States to take all the needed measures to fully implement the Waste Hierarchy, with strong measures needed in countries where landfilling is by far still the most important waste treatment route even for recyclable and recoverable waste.

The successive actions needed in the waste management chain are integrated to each other. Consistent national policies must address it as a whole, and this is why our sector should remain under the ESR.

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