

## FEAD's recommendation on EC proposal on the European Regional Development Fund and on the Cohesion Fund 2021-2027

March 2019

With great interest, FEAD has been following the current work of the European Parliament's REGI Committee on the EC proposal on the European Regional Development Fund and on the Cohesion Fund 2021-2027. In view of the plenary vote planned for 26 March 2019, we would like to provide you with a key recommendation regarding article 6, paragraph 1, point g, related to investment in facilities for the treatment of residual waste, as the allocation of EU structural funds can play an important role by investing in the collection of waste and treatment infrastructures that will enable a shift towards options higher up in the waste hierarchy, taking into account the different situations and needs across the European Union.

### WASTE MANAGEMENT: KEY CONCEPTS

#### 1) What is behind the concept of "recovery"?

Material recovery: According to article 3 §13a of the Waste Framework Directive, 'material recovery' means any recovery operation, other than energy recovery and the reprocessing into materials that are to be used as fuels or other means to generate energy. It includes, inter alia, preparing for re-use, recycling and backfilling (e.g composting of biowaste, backfilling with construction & demolition waste, metals from bottom ashes).

Energy Recovery: behind this notion, 2 systems are implied:

#### - Waste-to-energy for residual waste (losses from sorting for recycling):

→ Waste-to-energy (WtE) or energy-from-waste (EfW) is the process of generating energy in the form of heat/steam and/or electricity from the primary treatment of municipal waste and other non-hazardous waste, or the processing of waste to turn it into a fuel, e.g. solid recovered fuel (SRF).

→ The energy can be used to supply steam to industry, in efficient district heating and cooling networks, as electricity, and/or, in the case of SRF, as an alternative fuel for industrial combustion installations.

- **Anaerobic digestion (methanisation)** which should be developed in the context of the Clean Energy Package that requests the heating sector to move to renewable energy solutions, by an additional 1% a year, which means a shift from natural gas to biogas.

#### 2) Recycling means sorting refuses

Recycling is the highest step in an integrated waste management chain. In order to achieve recycling targets, further and better sorting will be needed, **resulting automatically in recycling losses**. In order (1) to avoid landfilling and (2) to recover as much as possible from these losses, financial supports are required in order to develop performing and economically viable waste to energy plants.

APOH, Slovakia

BDE, Germany

ESA, UK

FLEA, Luxembourg

HRABRI ČISTAC,  
Serbia

NORSK INDUSTRI,  
Norway

SRI,  
Sweden  
VOEB,  
Austria  
YTP,  
Finland

ARMD, Romania

CAObH, Czech  
Republic

EWMA, Estonia

FNADE, France

IWMA, Ireland

PASEPPE, Greece

ASEGRE, Spain

DWMA, Netherlands

FISE, Italy

go4circle, Belgium

LASUA, Latvia

PIGO, Poland

### 3) Definition of separate collection: a strong link with separate collection is needed

In order to make massive waste-to-energy solutions unlikely to replace recycling ones, a strong link with separate collection is needed. It is better to lay it out in a clear and concise way rather than introducing a confusing definition of residual waste. Consistency must be kept within the EU List of Waste, Decision 2000/532, which clearly distinguishes between selectively collected municipal waste fractions, and mixed municipal waste.

#### REGI Committee's Report - Article 6 –paragraph 1 –point g

Text proposed by the Commission	Report's amendment	FEAD's proposal for amendment	Justification
(g) investment in facilities for the treatment of residual waste;	<p>(g) investment in facilities for the treatment of residual waste <b>with the exception of outermost regions and in case of state-of-the-art recycling solutions in line with the principles of the circular economy and the waste hierarchy fully respecting the targets laid down in Art 11(2) of Directive (EU) 2008/98 and provided that Member States have established their waste management plans according to Art. 29 of Directive (EU) 2018/851;</b></p> <p><i>Residual waste should be understood as primarily non separately collected municipal waste and rejects from waste treatment.</i></p>	<p>(g) investment in facilities for the treatment of residual waste <b>with the exception of outermost regions and in case of <del>state-of-the-art recycling</del> recovery solutions in line with the principles of the circular economy and the waste hierarchy fully respecting the targets laid down in Art 11(2) of Directive (EU) 2008/98 and provided that Member States have established their waste management plans according to Art. 29 of Directive (EU) 2018/851;</b></p> <p><del>Residual waste should be understood as primarily</del> <i>Eligible facilities have to be part of non separately collected municipal waste schemes and rejects from waste treatment.</i></p>	<p>FEAD supports the continued eligibility of recovery facilities. Indeed, while separate collection and recycling of waste must be supported where technically, environmentally and economically practicable, the remaining materials (e.g. sorting residues) which cannot be fully reused or recycled should be treated in the most sustainable way, in line with the waste hierarchy. Waste to energy preserves the value of residual waste by turning it into materials, or fuels, electricity and/or heat, hence preventing resource losses, decreasing the need for fossil fuels in case of energy recovery, and reducing greenhouse gas emissions for material and energy recovery</p>

FEAD, the European Federation for Waste Management and Environmental Services, represents the private waste and resource management industry across Europe. FEAD's members are national waste management associations covering 19 Member States, Norway and Serbia.

FEAD's members represent about 3,000 companies with activities in all forms of waste management. Our companies have an approximate 60% share in the household waste market and handle more than 75% of industrial and commercial waste in Europe. Their combined annual turnover is approximately € 75 billion. These companies employ over 320,000 people who operate around 2,400 recycling and sorting centres, 1,100 composting sites, 260 waste-to-energy plants and 900 controlled landfills. They enable the transition to a circular economy by producing resources which can be re-injected in the economy and by supplying energy. Our companies add value through innovative and cost-efficient collection, sorting, and recycling of secondary raw materials. As a result, they play a crucial role in achieving the best economic and environmental outcomes.