

Brussels, 20th June 2016

To:

EU Environmental Council

EU Environment Ministers

EU Member States permanent representations to the EU

Dear representative,

the [Zero Waste Europe network](#) are writing to you to express our support for number of urgent priorities for the National Emissions Ceilings (NEC) Directive currently being negotiated.

We strongly support the revision of the NEC Directive, as it is an essential piece of legislation for improving local air quality, a clean environment and securing public health.

Most importantly, we particularly welcome the inclusion of targets for Particulate Matter (PM_{2,5}), which are often the result of unsustainable waste disposal practices, particularly waste incineration or so-called waste-to-energy incineration. A recent study (Aboh, et al. 2007) that looked into a medium sized city in southwestern Sweden, clearly identified their new modern incinerator as the single most significant source of PM_{2.5}'s.¹

Still, evidence from the waste incineration industry shows that filter bag systems used to collect the PM and other toxic emissions have a much lower efficiency rate with fine PM_{<2.5}: "...baghouse filter collection efficiency was 95-99% for PM₁₀s, 65-70% for PM_{2.5}s, and only 5-30% for particles smaller than 2.5 microns, even before the filters become coated with lime and activated carbon".²

As shown by the report [Air Pollution from Waste Disposal: Not for Public Breath](#), waste incineration activities have had serious breaches of emission limits and have experienced other significant technical and legal problems, both in incineration facilities and cement plants across Europe.

Case studies in the UK, France, Slovenia, Spain and Germany exposed a number of environmental, procedural and technical issues faced by waste incinerators, producing an excessive and unsustainable amount of air pollution, particularly PM.³

1 <http://senedd.cynulliad.cymru/documents/s7994/Yr%20Athro%20Vyvyan%20Howard%20Papur%202.pdf>

2 Howard C.V., The health impacts of incineration, with particular reference to the toxicological effects of ultrafine particulate aerosols, organo-chlorines and other emissions. Proof of Evidence submitted to East Sussex and Brighton and Hove Local Plan Public Inquiry, 2003.

3 http://www.bsem.org.uk/uploads/IncineratorReport_v3.pdf

Zero Waste Europe

Following the above, we are particularly concerned by the proposed weakening of PM2.5 commitments, as these pollutants have severe impact in human health and are of particular concern in urban environments.

It's necessary that NEC Directive maintains high ambition and ensures that local air pollution limits are achieved and air pollution effectively reduced. This will further reinforce the EU pathway to a Circular Economy, one that ensures clean air for all Europeans and beyond.

With this in mind, we urge that the outcome of the NEC Directive revision should include:

- Binding reduction targets for 2025, so that real progress can be made towards improving urban air quality before 2030.
- Ambitious emission reduction commitments, specially on PM, based on the European Commission proposal and European Parliament's plenary vote.
- Measures to encourage the reduction of toxic emissions at the source, providing members states with incentives to take appropriate action.
- Strong monitoring and reporting measures, ensuring transparency and avoidance of any potential loopholes or flexibilities which can undermine member states' ability to comply with the directive and effectively reduce toxic emissions.

While the [Zero Waste Europe network](#), together with the [Network of Zero Waste Municipalities](#) will continue working to promote and implement resource-efficient systems, free from toxic emissions, we urge you to support the highest ambition possible with the above mentioned measures in the final round of negotiations on the NECD.

Signed:

Zero Waste Europe