



To: Members of the European Parliament, ITRE & ENVI Committees

Subject: No Renewable Energy incentives for waste-based fuels from plastic

Brussels, 29 June 2017

Dear Members of the ITRE & ENVI Committees,

We the undersigned organizations believe that the inclusion of waste-based fossil fuels e.g. from plastics within the scope of the Renewable Energy Directive is a harmful distortion of renewable energy standards, and inconsistent with EU circular economy and climate policies. We call for integrity in standards for renewable energy incentives, and for an explicit exclusion of all articles related to the waste-based fossil fuels from the Commission's proposal on the revision of the Renewable Energy Directive.

Renewable energy support schemes were developed to promote the use of energy from renewable sources in the EU, in order to fight climate change and encourage the shift to a low-carbon economy. Burning or heating fossil waste such as plastics is the equivalent of burning fossil fuel, and therefore the opposite of renewable energy. Almost all plastics are derived from oil, gas, or coal, and burning them releases pollutants and greenhouse gases.

In addition subsidizing energy generation from waste-based fossil fuels (including gasification and pyrolysis) would subvert one of the cornerstones of the EU circular economy policy, and notably the waste hierarchy. This hierarchy establishes an order of priority in waste prevention and management: waste is meant to be firstly prevented, then prepared for reuse, and then recycled. Conversely, the current proposal allows renewable energy support schemes that conflict with the waste hierarchy, by encouraging recovery of energy from waste, which is the second least desirable option of the waste hierarchy. While solutions do exist to recycle low-grade plastics, the focus should be redesigning products, in particular single-use and non-recyclable ones. On the contrary, promoting the plastic waste to fuel would jeopardise



the efforts to close the loop of materials, while increasing our reliance on residual waste and non-recyclable plastics.

We are deeply concerned about the inclusion of waste-based fossil fuels in the scope of the Directive. The use of renewable energy funding for these is a massive step backward for the deployment of renewable energy sources in Europe and Circular Economy. We need to keep fossil fuels in the ground and redesign products to use less but more circular plastics, instead of trying to recover energy from them.

We therefore urge the members of the ITRE and ENVI Committees to explicitly exclude waste-based fossil fuels from the scope of the Commission's proposal for a revised Renewable Energy Directive.

Ekologi Brez Meja – Ecologists Without Borders
ECOS
European Environmental Bureau
Friend of the Earth Europe
Plastic Recyclers Europe
Zero Waste Europe