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President Ursula von der Leyen
European Commission
Rue de la Loi 200
1049 Brussels
Belgium

Object: concerns over the role of incineration in Ukraine's Recovery Plan

Dear President,

We are writing from Ukraine and across Europe as we are deeply concerned about the prospective EU funding facilitating the increase of incineration capacity in Ukraine in the coming years as part of Ukraine's recovery plan. Zero Waste Alliance Ukraine, which brings together six organisations across the country, has worked with citizens, businesses and municipalities to implement waste prevention practices and reduce waste generation in Ukraine. Member NGOs of Zero Waste Alliance Ukraine played a key role in setting up composting systems and sites in Ukrainian towns, campaigning against single-use plastics leading to a plastic bag ban starting in 2023, as well as supporting reuse and recycling practices, including new business models based on prevention and reuse.

It is very worrying to see that Ukraine's recovery plan presented in Lugano early July includes projects of building and modernising incinerators. According to the presented plan on waste management by the Ministry of Ecology and Natural Resources of Ukraine, Ukraine is seeking funds to build 27 waste-to-energy plants. One of the arguments for this decision is the need to deal with residual waste that is difficult to separate and recycle, caused by the war's destruction. We acknowledge the fact that military actions of Russia against Ukraine have brought tremendous amounts of demolition and construction waste, debris, textile and single-use packaging waste etc, yet building incinerators will not bring a response to this waste. The war should not be used to justify waste incineration. Before implementing any infrastructural projects we need to have clear data which states the ratio of the «war waste», so that civil society can analyse it and offer the best solution.

Building additional incineration capacity will lock-in Ukraine in damaging practices for the environment and people, instead of contributing to building the future. It also contradicts the Lugano principles, the EU legislation and the Paris Agreement.



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One of the Lugano principles is “sustainability” to ensure that the rebuilding process is “aligned with the 2030 Agenda for sustainable development and the Paris Agreement, integrating social, economic and environmental dimensions including green transition”. Funding incineration is actually working against the achievement of the Paris Agreement and United Nations Sustainable Development Goals (notably SDG 3,11, 12 and 13).

In addition, the EU waste hierarchy enshrined in EU law prioritises waste prevention and reuse, while incineration, including with energy recovery, is very low in the waste hierarchy. Therefore it should be disincentivized and phased-out. The EU has decided as part of the EU [Taxonomy Regulation](#) and the [Climate Change Mitigation and Adaptation Delegated Act](#) that investments in incineration, including with energy recovery, cannot be considered green investments. Moreover, the European Commission [guidance](#) on the application of ‘do no significant harm’ (DNSH) under the Recovery and Resilience Facility Regulation made investing in waste incineration an example of non-compliance with DNSH. We applaud this decision but we call on the EU to not promote practices outside its borders that it is not supporting within the bloc.

The decision to fund incineration in the recovery plan is even harder to understand because the EU recently adopted the candidate status for EU membership to Ukraine. As the accession process evolves, Ukraine will have to ensure its laws are aligned with EU legislation, as part of the *acquis communautaire*.

We therefore call you to ensure that the EU uses its critical role in the discussions on the recovery of Ukraine, to prevent the funding of incineration, and instead support the funding of initiatives that prevent waste generation at source. Solutions which have environmental, economic and social benefits include reuse and repair systems and centres, supporting extended producer responsibility (EPR), implementing Deposit Return Schemes, as well as supporting separate collection of bio-waste and composting infrastructures.

We thank you for your consideration and remain at your disposal to discuss this issue further.
Yours sincerely,

Sofia Sydorenko, on behalf of Zero Waste Alliance Ukraine
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Zero Waste Lutsk (Lutsk)
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