



To:

Permanent Representation to the EU

Copy to:

Frans Timmermans, Executive Vice President, European Green Deal, European Commission

Pascal Canfin, Chair of the Environment, Public Health and Food Safety Committee, European Parliament

Peter Liese, Member of the European Parliament

Brussels, 17 November 2022

**Subject: Inclusion of waste incineration in the EU-ETS**

Dear Permanent Representative,

On the 22nd of November, the fourth trilogue on the EU-ETS will be held to align it with the 55% greenhouse gas emissions reduction target set out in the European Climate Law.

To succeed in achieving the Unions climate goals, all actors, including municipal waste incineration installations must bear their climate costs. With more than 50 million tons of fossil CO2 emitted annually, waste incinerators in the EU are driving climate change.

The undersigned associations believe that in order to achieve the EU's climate protection targets, the municipal waste incineration capacities must be reduced and the climate protection potential of waste prevention and recycling must be fully exploited.

A recent report shows that inclusion of incineration in the EU-ETS will likely encourage waste prevention and recycling, yielding both climate and employment benefits<sup>1</sup>.

Waste incineration in Denmark, Sweden and Germany (from 2024) are already covered by the EU-ETS. Moreover, co-incineration facilities are also covered by the EU-ETS. Also, countries such as the Netherlands have CO<sub>2</sub> tax on incinerators. Integrating all waste incineration facilities in the EU-ETS by 2026 would mean a harmonisation of the regulation and would encourage waste prevention and recycling, yielding both climate and employment benefits<sup>2</sup>. It also reduces the risk of tax competition between regions.

We are therefore fully in favour of the inclusion of municipal solid waste incineration emissions under the EU Emission Trading System and call on the Council to support the deletion of the scope-exemption of municipal waste incineration installations in Annex I of the ETS-Directive.

We thank you for taking the views expressed in this letter into consideration. We remain at your disposal for any further assistance.

Yours sincerely,

List of signatories:

Deutsche Umwelthilfe e.V.  
Društvo Ekologi brez meja  
European Environment Bureau  
GLOBAL 2000 - Friends of the Earth Austria  
Humusz Szövetség  
No Plastic in My Sea  
Plastic Change  
Polish Zero Waste Association  
Rezero  
За Земята – Friends of the Earth Bulgaria  
VOICE Ireland  
ZERO - Association for the Sustainability of the Earth System  
Zero Waste Europe

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<sup>1</sup> CE Delft study for ZWE [https://zerowasteurope.eu/wp-content/uploads/2021/10/ZWE\\_Delft\\_Oct21\\_Waste\\_Incineration\\_EUETS\\_Study.pdf](https://zerowasteurope.eu/wp-content/uploads/2021/10/ZWE_Delft_Oct21_Waste_Incineration_EUETS_Study.pdf)

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