

Stop the expansion of incineration and address Europe's growing overcapacity

A joint call for a moratorium on new and expanded waste incineration

14 October 2026



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Dear President von der Leyen, Executive Vice-Presidents, Commissioners, Members of the European Parliament and national ministers,

We are **84 organisations from across Europe** calling on the EU to stop the expansion of waste incineration and address Europe's growing incineration overcapacity.

Europe has already built more waste incineration capacity than is needed to treat the waste currently being generated, while materials that could instead be prevented, reused or recycled continue to be burned. New analysis commissioned by Zero Waste Europe shows that the EU had **198.4 million tonnes of incineration capacity in 2022**, while only around 133.6 million tonnes of waste were treated. This means that Europe already had **almost 65 million tonnes of excess capacity**.

This overcapacity is likely to become even more significant as the EU meets its medium-term targets for material recovery under the Waste Framework Directive, as well as targets for waste prevention and reuse, including those for food waste prevention and packaging reduction and reuse. These policies will reduce the amount of waste available for incineration, potentially creating local conflicts between efforts to meet circular economy targets and the need to maintain sufficient waste volumes to repay existing incineration infrastructure, often through "deliver or pay" contracts or similar arrangements.

In 2017, the European Commission warned that: "The transition towards a circular economy requires striking the right balance when it comes to waste-to-energy capacity for the treatment of non-recyclable waste. This is critical to avoid potential economic losses or the creation of infrastructural barriers to the achievement of higher recycling rates. Previous experience in some Member States shows the risk of stranded assets is real"¹.

Since then, incineration capacity has continued to increase, without sufficient measures to ensure that capacity does not exceed the quantity of genuinely residual combustible waste that would remain if Europe's circular economy ambitions were fully achieved.

Building more incinerators in this situation risks locking Europe into decades of waste burning. It can also create pressure to keep these plants running and supplied with waste, instead of prioritising waste prevention, reuse and recycling.

¹ The role of waste-to-energy in the circular economy
<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52017DC0034>

At the same time, greenhouse gas emissions from municipal waste incineration have **increased by around 300% since 1990**, according to the European Commission's 2026 EU ETS impact assessment². This runs counter to EU climate and decarbonisation objectives. The Commission also expects emissions to continue increasing into the early 2030s without stronger action.

The inclusion of waste incineration in the EU ETS must therefore provide a **strong and consistent carbon price**. It should not simply make incineration slightly more expensive while allowing new plants to continue being built. Instead, it should help change the economics of waste management and support a shift away from incineration towards prevention, reuse, recycling and better sorting.

We call on the EU institutions and Member States to:

- **Stop the expansion of waste incineration** and establish a moratorium on new and expanded capacity.
- **Use the EU ETS to reduce incineration**, with a strong carbon price, no free allocation or unjustified exemptions, and use ETS revenues to support waste prevention, reuse, recycling and better sorting.
- **Use the Circular Economy Act to directly address incineration overcapacity**, including through coordinated national and regional capacity planning and measures to support the progressive retirement of unnecessary capacity.
- **Ensure that EU funds do not support new or expanded incineration capacity**, and instead support waste prevention, reuse, recycling and better sorting.

Europe should not respond to its circular economy and climate challenges by building more infrastructure to burn waste and release greenhouse gases.

Europe already has too much incineration capacity. The priority now must be to stop building more and start reducing the capacity we do not need.

We urge the European Commission, the European Parliament and Member States to make this a clear objective of the **EU ETS and Circular Economy Act**.

² SWD(2026) 616 - Impact assessment
https://climate.ec.europa.eu/publications/swd2026-616-impact-assessment_en

Signed,

ACP (Associazione Culturale Pediatri), Alianza Residuo Cero, Amigas de la Tierra, Association "Vides Sardze", Bad Vilbel Plastikfrei, Bund für Umwelt und Naturschutz, CEE Bankwatch Network, Center for Environment, Child Rights International Network (CRIN), Citizen Initiative Maksimir for Zagreb, Climate Coalition (SK), Coalition Résistance à l'Incineration, Collectif 3R (Réduire Réutiliser Recycler), Collesalviamo l'Ambiente, Coordinamento Ligure GCR (Gestione Corretta Rifiuti), Corporate Europe Observatory, Deutsche Umwelthilfe, Društvo Ekologi brez meja, Ecologistas en Acción, Eko udruga "NAŠ ZAVIČAJ", Eko-Logiczna Lubelszczyzna, EKO-UNIA Ecological Association, Environmental Investigation Agency, European Environmental Bureau, Everyday Plastic, Exit Plastik, Fare Eco, Federación de Ecologistas en Acción de la Comunidad de Madrid, Friends of the Earth-CEPA, Fundación Vida Sostenible, Gallifrey Foundation, Générations Futures, GLOBAL 2000, Health and Environment Justice Support (HEJSupport), Humusz Szövetség, Kakšno mesto hočemo, Kyoto Club, Landsforeningen Mindre Affald, Legambiente Nazionale Aps, Les Amis de la Terre - Belgique asbl, Marche a rifiuti zero, Maribor proti sežigalnici, Milieukontakt Albania, NGO Zero waste Lutsk, No Incinerator 4 Horsham, Noarc21, Ocean. Now!, Öko Tengely Egyesület, Organizacija za participatorno družbo, Plastic Soup Foundation, Polish Zero Waste Association, Priatelja Zeme - SPZ, RATI (Reading Against the Incinerator), Red Ecofeminista Iberica e Iberoamericana, REFLEX Environmental Association, Retorna, Rezero, Scarab Trust, Shireoaks and Rhodesia Against Plastic Pyrolysis (SRAPP), SINE (Stop Incineration North East), Stop Portland Incinerator Campaign, Stop Ratcliffe Incinerator, STOP wrocławskiej spalarni, The Association for Environmental Protection Resnik, Towarzystwo na rzecz Ziemi, United Kingdom Without Incineration Network (UKWIN), Unverpackt e.V. - Verband der Unverpacktläden, Vivir sin Plástico, Voice Of Irish Concern for the Environment, VŠJ "Žiedinė ekonomika", Women Engage for a Common Future - WECF, Za Zemiata, Zelena akcija, Zéro Déchet La Réunion, Zero Waste Bad Vilbel, Zero Waste Berlin e.V., Zero Waste Europe, Zero Waste France, Zero Waste Italy, Zero Waste Köln, Zero Waste Latvija, Zero Waste Nederland, Zeru Frazu Corsica, Znepokojené matky