JOINT LETTER

Call to stop the expansion of waste incineration and address Europe's growing incineration overcapacity



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.

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.

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 assessment. 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:

1 **Establish a moratorium on incineration**

Stop the expansion of waste incineration and establish a moratorium on new and expanded capacity.

2 **Design the EU ETS to reduce incineration**

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.

3 **Address overcapacity through the Circular Economy Act**

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.

4 **Avoid financial support for new 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**.

SIGNED BY THE FOLLOWING



APC – Associazione Culturale Pediatri

Citizen Initiative Maksimir for Zagreb

Alianza Residuo Cero

Climate Coalition (SK)

Amigas de la Tierra

Collectif 3R (Réduire Réutiliser Recycler)

Association Vides Sardze

Collesalviamo l'Ambiente

Bad Vilbel Plastikfrei

Coordinamento Ligure GCR (Gestione Corretta Rifiuti)

Bund für Umwelt und Naturschutz

Corporate Europe Observatory

CEE Bankwatch Network

Deutsche Umwelthilfe

Center for Environment

Društvo Ekologi brez meja

Child Rights International Network (CRIN)

Ecologistas en Acción

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Eko udruga
"NAŠ ZAVIČAJ"

Priatelia Zeme CEPA

Friends of the Earth
– CEPA

Eko-Logiczna
Lubelszczyzna

Fundación Vida
Sostenible

EKO-UNIA Ecological
Association

Gallifrey Foundation

Environmental
Investigation Agency

Générations Futures

European
Environmental
Bureau

GLOBAL 2000

Health and
Environment Justice
Support (HEJSupport)

Everyday Plastic

Humusz Szövetség

Exit Plastik

Fare Eco

Kakšno mesto
hočemo

Federación de
Ecologistas en Acción
de la Comunidad de
Madrid

Kyoto Club

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LEGAMBIENTE
NAZIONALE APS

Öko Tengely
Egyesület

Les Amis de la Terre
- Belgique asbl

Organizacija za
participatorno družbo

Marche a rifiuti zero

Plastic Soup
Foundation



Maribor proti
sežigalnici

Polish Zero Waste
Association

Milieukontakt
Albania

Priatelia Zeme - SPZ
(Friends of the Earth
- SPZ, Slovakia)

NGO Zero waste
Lutsk



RATI (Reading
Against the
Incinerator)



No Incinerator
4 Horsham

RED ECOFEMINISTA
IBERICA E
IBEROAMERICANA

Noarc21

REFLEX
Environmental
Association

Ocean. Now!

Retorna

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Rezero

United Kingdom Without Incineration Network (UKWIN)

Scarab Trust

Unverpackt e.V. - Verband der Unverpacktläden

Shireoaks and Rhodesia Against Plastic Pyrolysis (SRAPP)

Vivir sin Plástico

SINE (Stop Incineration North East)

Voice Of Irish Concern for the Environment

Stop Portland Incinerator Campaign

VšĮ "Žiedinė ekonomika"

Stop Ratcliffe Incinerator

Women Engage for a Common Future - WECF

STOP wrocławskiej spalarni

Za Zemiata

The Association for Environmental Protection Resnik

Zelena akcija (Friends of the Earth Croatia)

Towarzystwo na rzecz Ziemi

Zéro Déchet La Réunion

SIGNED BY THE FOLLOWING



Zero Waste Bad Vilbel

Zero Waste Köln

Zero Waste Berlin e.V.

Zero Waste Latvija

Zero Waste Europe

Zero Waste Nederland

Zero Waste France

Zeru Frazu Corsica

Zero Waste Italy

Znepokojené matky

Coalition Résistance à l'Incineration

Landsforeningen Mindre Affald