

Düsseldorf, 2019 September 26<sup>th</sup>

### **To whom it may concern**

ITAD (Interessengemeinschaft der Thermischen Abfallbehandlungsanlagen in Deutschland e.V.) is the German Association of Waste-to-Energy plants and represents nearly 100 percent of German Municipal Solid Waste Incinerators (MSWI) as well as Sewage Sludge Incinerators and Refuse Derived Fuel-Incinerators (RDFI).

ITAD supports the reduction of greenhouse gas emissions, the circular economy and the waste hierarchy, moving towards a resource efficient society.

We are concerned about the planned new waste import tax proposals by the Dutch government. We anticipate that this tax measure will massively hamper the well-established trans-border cooperation between Dutch and German waste management sector. Waste-to-Energy (WtE) plants on both sides of the border are an important part of a well-working integrated waste management approach and safeguard a high-quality recycling. Municipal and industrial waste producers trust in existing cooperation models which are which would be endangered by an import tax.

In addition to the effects on Dutch-German cooperation, we fear that the tax will lead to more Greenhouse gas emissions in Europe because the waste that is currently shipped to the efficient Waste-to-Energy plants in the Netherlands, would be landfilled.

The European WtE plants and especially the German WtE plants are currently running at full capacities and cannot absorb the waste that is imported to the Netherlands for energy recovery. Therefore, in case import taxes were to be introduced in the Netherlands, we assume that this waste would be landfilled (or, in a worst-case scenario, ends up in questionable recovery or disposal facilities outside Europe), causing significant amounts of greenhouse gases.

Landfill minimisation is crucially important for climate reasons: landfills are the main source of methane emissions in Europe<sup>1</sup>, which is 28 times more potent than CO<sub>2</sub> as a greenhouse gas. About 60 million tonnes of municipal waste are still landfilled in Europe (Eurostat 2019, data of 2017), 175 million tonnes if all waste streams except mineral waste were to be considered. It is a priority to shift this waste from landfilling to a treatment higher up in the waste hierarchy. Diverting these waste streams to Waste-to-Energy instead would prevent around 875 kg of CO<sub>2eq</sub> /tonne<sup>1</sup>.

WtE plants serve society and protect the environment by treating polluted substances in an environmentally sound way and recovering energy and materials (e.g. via metal recycling from bottom ash) in the process. WtE in Europe helps to avoid more than 75 million tonnes of CO<sub>2eq</sub> emissions<sup>2</sup> yearly, diverting residual waste from landfills and recovering energy that would otherwise be produced using fossil fuels this way playing a double role in climate mitigation.

1) The European Pollutant Release and Transfer Register, EPRTR. <https://prtr.eea.europa.eu/#/home>

2) Calculation based on German UBA study: The Climate Change Mitigation potential of the waste sector – 2015

We would like to ask the decision makers in the Netherlands to reconsider their tax plans in order to keep Dutch-German cooperation for a resource-efficient circular economy alive and to avoid an overall increase of greenhouse gas emissions in Europe.

With kind regards,

A handwritten signature in blue ink, appearing to read 'Carsten Spohn', with a large, stylized flourish extending to the right.

Carsten Spohn

Managing Director  
ITAD e.V.