

Brussels, 25th September 2019

CEWEP Statement on the Proposed Netherlands Waste Import Tax

To whom it may concern

CEWEP 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 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 Waste-to-Energy (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, causing significant amounts of greenhouse gases.

Landfill minimisation is crucially important for climate reasons: landfills are the main source of methane emissions in Europe¹, which is 28 times more potent than CO₂ 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_{2eq}/tonne¹.

Furthermore, the energy that is not generated from the (imported) waste would have to be produced by other (mainly fossil) sources in the Netherlands which would be counterproductive to the aim of reducing greenhouse gas emissions and the use of (limited) fossil fuels.

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_{2eq} emissions² 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 avoid an overall increase of greenhouse gas emissions in Europe.

With kind regards,

Dr. Ella Stengler
CEWEP Managing Director

CEWEP (Confederation of European Waste-to-Energy Plants) is the umbrella association of the operators of Waste-to-Energy plants across Europe. CEWEP's members are committed to ensuring high environmental standards, achieving low emissions and maintaining state of the art energy production from remaining waste that cannot be recycled in a sustainable way.