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Fédération Européenne des Activités de la Dépollution et de l'Environnement  
European Federation of Waste Management and Environmental Services  
Europäische Föderation der Entsorgungswirtschaft

## **FEAD position on the Draft Report on the European Commission's proposal for the Directive on the promotion of the use of energy from renewable sources**

On 23 January 2008, the European Commission presented a proposal for a Directive on the promotion of the use of energy from renewable sources. FEAD, the European Federation of Waste Management and Environmental Services, supports the ambitions of the European Union to achieve its energy and climate change goals.

Therefore, following the adopted report in the ITRE Committee, FEAD strongly opposes the proposal to change the definition of biomass in Article 2 (b) to:

(b) "biomass" means the biodegradable fraction of products, waste and residues from agriculture (including vegetal and animal substances), *aquaculture*, forestry and related industries, the *separated collected* biodegradable fraction of industrial and municipal waste *as well as wastewater sludge*;

The current Directive 2001/77/EC on the promotion of electricity from renewable energy sources, recognizes, with good reason, the biodegradable fraction of municipal waste as biomass, thus as a renewable energy source.

FEAD encourages source separation of waste and respects the priority given to recycling (incl. composting). However, the biodegradable proportion of the remaining municipal waste is significant (more than 50 %) as the separation of waste is not always possible from a technical and environmental point of view. Therefore, the remaining significant biodegradable fraction should not be excluded from the biomass definition. As foreseen in the revised Waste Framework Directive, separated waste will very likely be destined for recycling. Excluding unseparated waste from the scope of the biomass definition will, however, lead to it not being considered as a potential renewable energy source, acting as a disincentive to recover the beneficial energy from it, and therefore possibly leading to its continued disposal to landfill.

Given the ambitious EU - targets for energy consumption from renewables, Europe cannot afford to lose the overall potential of the biodegradable fraction of industrial and municipal waste. Moreover, the draft RES Directive considers biofuels made from waste as giving additional benefit to the one from other sources. For the purposes of demonstrating compliance with national renewable energy obligations placed on operators, the contribution made by biofuels produced from waste shall be considered to be twice that made by other biofuels (Article 18, para 4).

FEAD understands that the Rapporteur is seeking to boost separate collection of biowaste. However, separate collection of biowaste (Article 22) is dealt with in the Waste Framework Directive, which was voted upon by the European Parliament in June 2008 and which will be adopted soon by the Council. Additional support should come from a dedicated bio-waste directive. FEAD would therefore like to underline that the definition of biomass in the RES Directive should not be misused to try to impose waste collection methods.

### **FEAD therefore would like to ask you to keep the Commission's biomass definition and reject any modification thereof ("separated collected").**

FEAD is the European Federation representing the European waste management industry. Its members are national waste management associations, with an approximate 70% share in the household waste market and handling more than 75% of industrial and commercial waste in Europe (with a collective annual turnover of approximately € 50 billion). FEAD has 20 members from 19 EU Member States and Norway. FEAD represents companies with activities in all forms of waste management. These companies employ over 350 000 people who operate around 2 000 recycling and sorting centres, 1 700 composting sites, 400 waste-to-energy plants and 2 200 controlled landfills and play an important role in the determination of the best environmental option for waste management problems.

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