

CEWEP Ireland response to the European Commission Public Consultation on the revision of the Waste Shipment Regulation

CEWEP is the umbrella association of the owners / operators of waste-to-energy (WtE) facilities, representing approximately 500 plants across Europe. Our members represent nearly 90% of European WtE capacity.

CEWEP Ireland is the Irish branch of CEWEP Europe and has two members. Indaver operates the Meath Waste-to-Energy facility and is proposing to develop similar facilities in Belfast and Cork. Covanta operates the Dublin Waste-to-Energy facility. Members currently have a total treatment capacity of over 900,000 tonnes per annum residual waste and export almost 80MW of electricity (the equivalent of 140,000 homes per annum).

CEWEP Member's activities support circular economy objectives including the recently adopted Circular Economy Package (CEP) by diverting non-recyclable resources from landfill and recovering valuable energy from the same.

In this regard, the inclusion of two questions in the consultation questionnaire appear to suggest that the movement of waste when destined for energy recovery should be made more difficult.

CEWEP Ireland strongly opposes the inclusion of such questions and request that the same be removed from the consultation questionnaire with immediate effect. This is imperative as the questions as currently framed are contrary to the proper application of the waste hierarchy as if such shipments are made more difficult, this would result in a greater level of non-recyclable waste being diverted to landfill.

This is clearly at odds with the Circular Economy Package and the Landfill Directive target aimed at reducing the landfilling of municipal waste to 10% by 2030 and given that Eurostat data from 2018 shows that approximately 56 million tonnes of municipal waste is still landfilled in Europe.

Moreover, the questions at hand are also incompatible with the European Commission Waste to Energy Communication (2017)¹ wherein it is stated that:

'Member States with low or non-existent dedicated incineration capacity and high reliance on landfill' where Member States are advised to take into account, planned or existing capacity in neighbouring countries'.

¹ European Commission Communication, The Role of Waste-to-Energy in the Circular Economy (2017)
<https://ec.europa.eu/environment/waste/waste-to-energy.pdf>

“In justified cases, the cross-border shipments of waste could help to make optimal use of the waste-to-energy capacity already available in a number of Member States. Exporting non-recyclable waste for energy recovery to another Member State should not necessarily be seen as contradicting the so-called principle of proximity (i.e. using the nearest appropriate facility) that underpins EU waste legislation.

However, before opting for such approach competent authorities in the Member States should carry out a life-cycle analysis to ensure that the overall environmental impacts, including those related to the transport of waste, do not offset the sought benefits.

Finally, the inclusion of the aforementioned questions give rise to a serious concern regarding the potential for discriminatory treatment of WtE versus other shipments for recovery and may be regarded as contrary to the proper functioning of the European Union’s internal market.

In light of the foregoing significant concerns, CEWEP Ireland hereby requests that the above mentioned questions be removed from the consultation questionnaire without delay.

Yours Sincerely,



Jackie Keaney

President, CEWEP Ireland