



Brussels, 5 November 2008

BIOMASS definition Directive Renewable Energy Sources

CEWEP – Confederation of European Waste-to-Energy Plants (www.cewep.eu),

EFIEES – European Federation of Intelligent Energy Efficiency Services (www.efiees.eu),

ESWET – European Suppliers of Waste to Energy Technology (www.eswet.eu),

EUROHEAT&POWER – International Association for District Heating, District Cooling and Combined Heat and Power (www.euroheat.org), and

FEAD – European Federation of Waste Management and Environmental Services (www.fead.be),

are united in expressing their **grave concerns over the modified BIOMASS definition** as adopted by the Industry, Research and Energy Committee of the European Parliament on 11 September 2008. Please find below a **combined proposal for a Compromise amendment** in view of the **plenary vote on 4 December 2008**.

<i>Proposal from ITRE Committee Article 2 - Definitions</i>	<i>Joint proposal from CEWEP–EFIEES–ESWET– EUROHEAT&POWER–FEAD Article 2 - Definitions</i>
(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;	(b) “biomass” means the biodegradable fraction of products, waste and residues from agriculture (including vegetal and animal substances), aquaculture, forestry and related industries, the biodegradable fraction of industrial and municipal waste as well as wastewater sludge;

Justification

Imposing a separate collection of biomass from residual waste, resulting itself from a separate collection (separating recyclable and non-recyclable materials) as supported by the ITRE Committee’s proposal, does not make any sense. Source separation for several waste streams, as well as ambitious recycling targets, have been introduced within the recently adopted Waste Framework Directive, and the results of these comprehensive discussions should not be contradicted within the RES Directive. Therefore, the ENVI Committee rejected the approach of the ITRE Committee’s Rapporteur last July.

It is worth mentioning that even after efficient separate collection, the biodegradable part is still significant. According to a study conducted in Germany, where source separated biowaste collection is advanced, the biogenic fraction in the waste is 62% by weight¹. Despite the fact that the Netherlands have also installed an efficient system of source separation achieving high recycling rates, the Dutch ministry of economic affairs determined for 2008 that 48% of the electricity production of waste-to-energy plants comes from the biodegradable fraction of municipal waste. Moreover, the German Federal Environment Agency UBA recently pointed out that “the energy content of residual waste from human settlements is about 50% biogenic content, which can be classed as carbon dioxide-neutral”².

¹ Öko-Institut,

http://www.itad.de/storage/med/docs/energie/12_beroekoin02.pdf?fCMS=98943b1eb821c749e83d905e6723e18b

² <http://www.umweltbundesamt.de/uba-info-presse-e/2008/pe08-052.htm>

In combination with:

<p style="text-align: center;">Proposal from ITRE Committee Article 5.1</p>	<p style="text-align: center;">Joint proposal from CEWEP–EFIEES–ESWET– EUROHEAT&POWER–FEAD Article 5 - Calculation of the share of energy from renewable sources</p>
<p>1. The final consumption of energy from renewable sources in each Member State shall be calculated as the sum of:</p> <ul style="list-style-type: none"> (a) final consumption of electricity from renewable energy sources; (b) final consumption of energy from renewable sources for heating and cooling; and (c) final energy from renewable sources consumed in transport. <p>Gas, electricity and hydrogen from renewable energy sources shall only be considered once in either 1(a), 1(b) or 1(c) for calculating the share of final consumption of energy from renewable sources.</p> <p>Biofuels and other bioliquids that do not fulfil the environmental sustainability criteria in Article 15 shall not be taken into account.</p>	<p>1. The final consumption of energy from renewable sources in each Member State shall be calculated as the sum of:</p> <ul style="list-style-type: none"> (a) final consumption of electricity from renewable energy sources; (b) final consumption of energy from renewable sources for heating and cooling; and (c) final energy from renewable sources consumed in transport. <p>Gas, electricity and hydrogen from renewable energy sources shall only be considered once in either 1(a), 1(b) or 1(c) for calculating the share of final consumption of energy from renewable sources.</p> <p>Biofuels and other bioliquids that do not fulfil the environmental sustainability criteria in Article 15 shall not be taken into account.</p> <p>Member States shall establish for installations using waste to generate energy, the proportion of energy produced that is to be considered as renewable.</p>

Justification

Waste-to-energy installations should not count the energy they produce as 100% renewable, if only part of the waste they use is biodegradable waste. Furthermore, the proportion of biodegradable waste varies from one Member State to another. Calling upon Member States to define a ratio, based on facts that will be applied to every waste-to-energy plant (e.g. in France, it is 50%) will prevent abuse.

At present waste-to-energy installations have no legal guidelines or obligation to account for the rate of renewable energy they produce in proportion to the biodegradable waste they use.

As a consequence, CEWEP, EFIEES, ESWET, EUROHEAT&POWER, and FEAD:

- a) call for the rejection of the modification of the biomass definition as proposed by the ITRE Committee;**
- b) remind the European Parliament that the ENVI Committee had rejected the modification of the biomass definition with respect to waste;**
- c) urge for the tabling and the adoption of the biomass definition as jointly proposed by CEWEP, EFIEES, ESWET, EUROHEAT&POWER, and FEAD.**