

No inclusion of composting and anaerobic digestion of biowaste in the EU Emission Trading System (EU-ETS)

The ECN has been a long-standing advocate for diverting biological waste from landfills to implement separate collection of biowaste for high quality recycling at an European level. Millions of tons of usable biological waste are still being landfilled in Europe. After all, the best available technique is biological treatment (anaerobic digestion and composting) including energy recovery (biogas/biomethane) with the subsequent use of the recycled products (compost and digestate), as they are important sources for sustainable and locally produced nutrients and organic matter.

Our sector processes mainly source separated biowaste in digestion and/or composting facilities, thereby not only substituting organic matter and nutrients through compost and digestate but also producing biogas/biomethane that substitutes the use of fossil fuels. The diversion of biowaste from landfills for making biogas, digestate and compost comes with million tons of direct CO₂ savings.¹

Composting and anaerobic digestion are essential in attaining the objectives of the Green Deal in terms of **increasing reliance on green energy, reducing the EU's carbon footprint, saving resources and contributing to carbon sequestration**. Both biowaste treatments are therefore more highly placed in the waste management hierarchy, and should thus not be considered on an equal base as landfilling or waste incineration.

According to Article 22 of the EU Waste Framework Directive biowaste separate collection will become mandatory in 2024. This great potential for the use of separately collected biowaste in composting/anaerobic digestion can contribute to the goals set in EU Green Deal policy especially for mitigating greenhouse gases and for keeping our soils healthy and fertile.

The ECN's assessment is that the inclusion of anaerobic digestion and composting in the EU-ETS would undermine more than 20 years of efforts to introduce efficient separate collection and treatment of biowaste. As a consequence, it will significantly weaken high quality

¹ Please find enclosed the recently published CO₂ savings study referring also to biowaste (page 87- 88) to read more about the solid causality between landfill reduction of biowaste and biowaste treatment <https://www.wastematters.eu/news/european-waste-sector-has-an-impressive-climate-potential>

recycling of biowaste for biogas, digestate and compost production. High quality recycling of biowaste is crucial to achieve the 55% GHG emission reduction target by 2030. Additionally, without separate collection and recycling of biowaste, it will be impossible for Member States to achieve the recycling targets and the Farm to Fork targets.

The ongoing **geopolitical concerns about energy security and related energy costs, as well as fertilizer price developments**, also **require a significant increase in the high-quality recycling of biowaste**. Biowaste is an important resource for sustainable nutrients and organic matter.

The policies under the EU Green Deal are designed to promote the circular economy and generate valuable biobased energy, organic fertilizers and soil improvers, which replace mineral fertilizers, maintain and increase organic matter in soils and replace peat in growing media. **Keeping biowaste away from landfills, saving resources and energy and sequestering carbon in soil² will save CO₂ and will contribute to the fight against climate change.**

The ECN urges the Environmental Committee of the European Parliament not to include biowaste management under the EU-ETS, as this would counteract the objectives of recycling of nutrients and organic matter, and the goals of an effective transition to a circular economy.

Further, the biowaste sector has to grow, by implementing separate collection and treatment of biowaste, in order to achieve the recycling targets of municipal waste of the Waste Framework Directive and also to contribute to the potential to reduce additional CO₂ through the diversion of waste from landfills. It is of utmost importance to stop landfilling of biowaste and to promote the use of recycled organic materials.

In other words, an inclusion in the ETS – as amendment No 185 suggests – will have a contra-productive effect and we strongly advise you to withdraw this particular amendment.

About the European Compost Network (ECN) The **European Compost Network (ECN)** is the leading European membership organisation promoting sustainable recycling practices by composting and anaerobic digestion of organic resources and guarding over the quality and safe use of the recovered organic fertilisers and soil improvers. With 68 members from 27 European Countries ECN represents more than 4500 experts and plant operators with more than 45 million tonnes of biological waste treatment capacity.

² Please find enclosed the ECN Fact sheet on Soil structure & Carbon storage. <https://www.compostnetwork.info/download/soil-structure-carbon-storage/>