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**DIRECTIVE ON THE
INCINERATION OF WASTE**
BASIC PRINCIPLES IN THE COMMISSION'S PROPOSALS

UNICE POSITION PAPER

Safe incineration of combustible materials classified as waste is of utmost importance for society and for industry as a whole. An unavoidable reality is that, without waste incineration with energy recovery, it is environmentally and economically difficult to meet the recovery targets of existing and forthcoming legislation on priority waste streams, of which the Directive on packaging and packaging waste is a good example.

Coherence between Directives for incineration and IPPC is needed

The Commission proposal for a Directive on incineration of waste should be coherent with the IPPC Directive, as its purpose is to revise extensively the permit procedures for the control of emissions of industrial pollutants covered by the IPPC Directive. For consistency, therefore, the scope of the proposal should take into account the geographical location of the plant in question and the local environmental conditions. Regarding emission limit values, parameters and technical measures, both best available techniques (BAT) and the installation specific approach should be taken into account in order to ensure a high level of environmental protection throughout the EU in line with the 5th Environmental Action Programme. This would allow an integrated approach to pollution control.

The advantage of optimised use of existing incineration infrastructure should be utilised

UNICE wants to point out that existing incineration capacities (dedicated as well as co-incineration units) should be utilised as far as possible in order to meet the requirements of waste management regulations in the EU. It would otherwise be almost impossible to meet the ambitious goals laid down, for instance in the packaging waste directive, since in many of the EU Member States an infrastructure of dedicated waste incinerators has not been established or their number is limited. As recycling potential is restricted for some of the recovered waste materials, the remaining alternatives are either co-incineration or transport of waste to remote areas.

As a rule, large combustion plants as well as some other plants suitable for co-incineration satisfy part of their fuel supply by utilising non-hazardous waste. In fact, this kind of activity has increased in power-and-heat generating plants and in cement kilns. UNICE considers that this should be encouraged as the results are economically and, more particularly, environmentally beneficial. First of all, fossil fuels are spared and partly replaced with recovered combustible materials, whilst in addition total greenhouse gas emissions are reduced. Secondly, existing infrastructure can be used saving expensive new capital investments. In addition, environmental control by the authorities and increasingly common environmental management systems ensure safe incineration and thorough selection and scrutiny of the fuels supplied to the plant.

UNICE is firmly of the opinion that this opportunity for co-incineration must not be jeopardised. Therefore, UNICE is seriously concerned that in the Commission proposal the terms for co-incineration are fixed so strictly that it is highly questionable whether combustion plants or industrial plants are able to accept such materials in addition to their regular fuels. It is a known fact that in most cases non-hazardous waste would in all likelihood not lead to an increase in the emissions of harmful pollutants. On the contrary, the use of alternative fuels can result in even lower overall emissions.

High-cost monitoring should be proportional to the estimated risks

As an example it is known that dioxins and furans are serious pollutants and some plants treating waste have probably been one of the main sources for emissions of these pollutants into air. UNICE therefore shares the concern of the Commission and agrees that careful control of possible emissions is needed in many cases. However, it has been shown that proven techniques for reduction of gaseous emissions can reduce dioxin emissions constantly to levels well below the limit values. Furthermore, it is acknowledged that monitoring of dioxins and furans is highly expensive. Therefore UNICE considers that frequently repeated measurements should not be imposed. In general, it can be demonstrated that design and compliance with preset operating conditions are sufficient.

Safe co-incineration is a prerequisite for fulfilment of EU waste strategy

To meet the waste management goals set in the 3rd Environmental Action Programme and in the Community Waste Strategy set by the Council, incineration of materials classified as waste is essential. As the capacity of dedicated waste incineration plants is limited in large parts of the EU, considerable co-incineration is also needed. In conclusion, UNICE underlines that the provisions for co-incineration must be set logically and realistically, and acknowledge the fundamental characteristics of each of the industries to be covered by the Directive. UNICE underlines that such new legislation should have a transition period enabling industry to plan and to make investments according to industry practice.