

Statement by the Arbeitsgemeinschaft Stoffspezifische Abfallbehandlung e. V. (Working Group on Material-Specific Waste Treatment) and the Gütegemeinschaft Sekundärbrennstoffe und Recyclingholz e. V. (Quality Association for Secondary Fuels and Recycled Wood) on the targeted public consultation - Draft Guidelines on the Application of the “Do No Significant Harm” Principle within the Framework of the Multiannual Financial Framework (MFF) 2028–2034

The Working Group on Material-Specific Waste Treatment (ASA e. V.) and the Quality Association for Secondary Fuels and Recycled Wood e. V. (BGS e. V.) strongly disagree with the assumption made in the European Commission’s concept paper that mechanical-biological waste treatment (MBT) facilities are “generally operated without an effective separate collection system.” In Germany, as well as in numerous other member states of the European Union, MBTs are firmly integrated into existing waste management infrastructure and are used in conjunction with established separate collection systems. Mechanical-biological waste treatment fulfills an important function by processing residual waste and other waste streams, separating remaining recyclable material streams, and stabilising the biological fine fraction, thereby significantly reducing the volume of waste sent to landfills. MBTs reduce greenhouse gas emissions through material-specific waste treatment and the substitution of primary raw materials and primary fuels.

Against this backdrop, mechanical-biological waste treatment should be taken into account within the European funding framework and not be excluded across the board. The concept paper provides for exemptions for other waste treatment technologies, such as thermal recovery. Comparable exceptions must also be created for mechanical-biological waste treatment. This is the only way to ensure that MBT remains eligible for funding as a proven technology, both in existing waste management infrastructures and in the development of such infrastructures in countries where waste management still has room for improvement. Only in this way can its contribution to preventing landfill methane emissions and to fully realizing existing CO₂ reduction potential continue to be harnessed.

MBT facilities that have been in operation for a long time require modernization, which will allow the optimization potential of mechanical-biological waste treatment to be fully realized. Scientific studies also confirm the possibilities for optimizing this potential. A 2023 study by the Federal Environment Agencyⁱ indicates that the targeted removal of fossil components from waste streams used for energy recovery can support the strategy to reduce fossil CO₂ emissions as part of the energy transition and decarbonization. In this way, MBTs not only help to prevent waste from ending up in landfills but also contribute to the further decarbonization of the waste management sector.

Mechanical-biological waste treatment facilities are an important component of a functioning circular economy. Their environmental impacts and potential for optimization are scientifically complex and heavily dependent on the specific conditions. A blanket exclusion from eligibility does not take this complexity into account and could unnecessarily limit the current and future contribution of this technology to climate and resource protection.

ⁱ Further development of mechanical-biological waste treatment (MBT) with the aim of optimising resource efficiency and minimising greenhouse gas emissions (UBA-Texte 156/2023); <https://www.umweltbundesamt.de/publikationen/weiterentwicklung-der-mechanisch-biologischen>

To continue ensuring the eligibility of mechanical-biological waste treatment, we propose - based on the list of activities that could be considered significantly harmful to one or more environmental objectives, unless they meet the specific “exemption criteria” listed therein, and provided that meeting the requirement in one of the “exemption criteria” (i.e., an indent under each item on the list) is sufficient to comply with the DNSH principle, -- the following as possible exceptions to the DNSH principle:

1. ***Evidence of measures to reduce the landfilling of biodegradable waste, to stabilise residual waste, to recover recyclable materials or to reduce greenhouse gas emissions***
2. ***Evidence of an effective sorting and separate collection system: within the catchment area of the mechanical biological treatment plant (MBT), there is a separate collection system for municipal waste (paper, cardboard, glass, packaging, biowaste, etc.) that complies with statutory requirements. Evidence of this is provided by the responsible waste management authority***

Explanation 1 and 2: The addition in the footnote stating that ‘*Mechanical biological treatment plants (MBTs) are residual waste treatment facilities combining some form of mechanical sorting/physical treatment with biological treatment, possibly complemented by the preparation of an energy-rich waste fraction. They are usually operating in the absence of an effective sorting and separate collection system*’ does not reflect the current situation in many European countries. Mechanical-biological waste treatment plants are found in many countries internationally, but particularly in Europe, where there is a well-developed waste management infrastructure. A well-developed waste management infrastructure also includes a functioning separate collection system for other fractions of municipal waste, such as biowaste or paper.

However, a particularly important aspect is the distinction between an existing waste management infrastructure and the implementation of such an infrastructure. MBT can play a decisive role, particularly during the implementation phase. In countries without comprehensive separate collection schemes, without sufficient recycling capacity and with few thermal treatment facilities, MBT represent a viable option at short notice for reducing the landfilling of untreated municipal waste. By reducing the volume of waste sent to landfill, they make a significant contribution to reducing methane emissions and environmental impact. MBT should therefore be permitted as an exception where they demonstrably contribute to a significant reduction in the landfilling of untreated municipal waste, to the stabilisation of residual waste, to the recovery of recyclable materials, or to the reduction of greenhouse gas emissions.

3. ***Optimisation of sorting and recovery of recyclable materials: Investment in technologies for the separation of metallic or other material streams (e.g. plastic, glass, paper) of a demonstrably marketable recycled quality, which are then used for material recovery.***

Explanation of point 3: Optimising sorting and recovery of recyclable materials can have a direct positive impact on resource conservation and climate protection.

4. ***Optimisation of the digestion stage by removing inert fractions in plants with a digestion stage or utilising further biodegradable fractions: Targeted separation of inert components (e.g. sand, stones, glass) from the fine fraction prior to feeding into the digestion process or targeted separation of biodegradable constituents from the coarse fraction and feeding into the digestion process***

Explanation of point 4: During the pre-treatment process, inert components enter the organic fraction for digestion. These can increase wear and tear on the plant equipment and, in particular, reduce throughput. By selectively separating out the inert components, the throughput of the organic fraction – and thus also the biogas yield – can be increased.

As a result of the pre-digestion treatment steps, biodegradable components are transferred to the coarse fraction and are no longer available for digestion. Therefore, the targeted separation of these components and their feeding into the digestion process would increase biogas yield.

5. *Integration of a digestion stage for mechanical biological treatment (MBT): Adding a digestion stage to existing MBT plants.*

Explanation of point 5: The addition of a digestion stage relieves the burden on biological treatment capacities and, through the production of biogas (electricity and heat), significantly improves the plants' greenhouse gas balance. However, particularly in Germany, such investments are currently often not cost-effective, as the surplus electricity generated is disadvantaged under the Renewable Energy Act feed-in tariff scheme compared to surplus electricity from biowaste treatment plants and must be sold to the local utility at unfavourable terms. Recognition as a DNSH-compliant exception could provide additional investment incentives in this regard.

6. *Switch from mechanical biological treatment (MBT) to biological drying: Switch from MBT (in whole or in part) to biological drying.*

Explanation of point 6: The aim of switching the biological treatment process to biological drying is to separate further fractions from the fine fraction for energy recovery and to minimise the remaining quantities destined for landfill even further. Depending on the treatment process, an additional 10–20 per cent of the calorific value of the input waste can be channelled into energy recovery, which improves the efficiency and carbon footprint of the entire plant.

7. *Efficiency in exhaust air treatment: Use of modern exhaust air systems to optimise exhaust air flow capture, thereby reducing the energy required for exhaust air treatment.*

Explanation of point 7: Through the use of modern exhaust air systems, exhaust air flows can be captured separately or concentrated. In Germany, the exhaust air is fed into a regenerative thermal oxidation system. By using modern exhaust air systems, less contaminated air can be reused as process air, and the more concentrated exhaust air can be treated with lower energy consumption. This results in a significant improvement in efficiency in the overall emissions balance. To optimise exhaust air treatment in mechanical biological treatment (MBT) plants, an EU-wide research project, the LIFE ABATE projectⁱⁱ, is currently being carried out.

8. *Upgrading of separated high-calorific fractions to Solid Recovered Fuel*

Explanation of point 8: By upgrading separated high-calorific fractions to Solid Recovered Fuel and subsequently using them in an energy-efficient manner as a native substitute for fossil fuels, a significant and sustainable contribution can be made to reducing CO₂ emissions and cutting energy imports (see also the EU demonstration project RECOMBIOⁱⁱⁱ).

ⁱⁱMarketable high performance compact technologies for the abatement of VOCs in EU waste treatment plants, decreasing CO₂ emissions and energy consumption; <https://webgate.ec.europa.eu/life/publicWebsite/project/LIFE22-ENV-ES-LIFE-ABATE-101113838/marketable-high-performance-compact-technologies-for-the-abatement-of-vocs-in-eu-waste-treatment-plants-decreasing-co2-emissions-and-energy-consumption>

ⁱⁱⁱ Project RECOMBIO - Recovered Fuels combined with Biomass <https://cordis.europa.eu/project/id/239530>

The ASA supports the proposed exemptions in their entirety and unequivocally. From the ASA's perspective, the exemptions help to promote existing and future opportunities for landfill avoidance, resource conservation, and climate protection, and to integrate these into waste management infrastructure. As part of the technical discussion and the drafting of this statement, the ASA has thoroughly examined the proposed exemptions and recognizes, in particular, their significance for the further development of innovative methods of mechanical, biological, and material-stream-specific waste treatment. A blanket exclusion of individual technologies would fail to account for the varying starting conditions in the member states as well as the diverse technical options for reducing emissions and recycling material streams. Therefore, the ASA supports all proposed exemptions as an important contribution to achieving Europe's climate and circular economy goals.

For over 25 years, the Quality Association for Solid Recovered Fuels and Recycled Wood (BGS e. V.) stands for climate-friendly and resource-conserving energy supply through high-quality, quality-assured solid recovered fuels. These quality-controlled solid recovered fuels (SBS® in accordance with the RAL GZ 724 quality mark) are a valuable, low-emission, and sustainable energy source. SBS® ensures high-quality utilisation even for fractions that cannot be recycled for material recovery for economic or technical reasons. In addition, BGS e. V. contributes its extensive experience and expertise to the standardization work for SRF (ISO TC 300) for many years. BGS e. V. therefore specifically supports Exception 8.

The Association for Material-Specific Waste Treatment (Arbeitsgemeinschaft Stoffspezifische Abfallbehandlung (ASA) e.V.) brings together its members - experts and professionals in the field of material-specific waste treatment - to strengthen the circular economy. By pooling our expertise and fostering close collaboration among our members, we develop innovative and sustainable solutions that address the challenges of our time and have a long-term impact. We create a trusting environment for the exchange of knowledge and professional development, competently represent our members' interests in dealings with policymakers and the public, and actively advocate for environmental protection. The ASA promotes collaboration and supports the development of new approaches to waste treatment. Together, we work to strengthen the circular economy and shape a sustainable future.

The Quality Association for Secondary Fuels and Recycled Wood (Gütegemeinschaft Sekundärbrennstoffe und Recyclingholz e. V.), or BGS e. V. for short, was founded in 1999. The goal of its work is to promote the production and use of quality-assured secondary fuels in order to conserve natural resources and reduce CO₂ emissions. Together with manufacturers and users of secondary fuels, as well as other companies and institutions, we are committed to achieving this goal through a wide range of activities.

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