

18 March 2026

Dear President of the European Commission von der Leyen,

Dear Commissioner Hoekstra,

Dear Commissioner Séjourné,

Dear Commissioner Roswall,

The undersigned organisations, representing a broad coalition of industrial stakeholders and civil society committed to Europe's climate neutrality, competitiveness and circular economy objectives, write to express our support for the inclusion of waste incineration plants, including hazardous waste treatment, within the EU Emissions Trading System (ETS).

The ETS has proven to be a central and effective instrument for delivering driving cost-efficient emissions reductions while providing long-term investment certainty for energy-intensive sectors. As the EU advances its climate and industrial policy agenda, maintaining integrity, coherence and predictability of this framework is increasingly important.

Today, a wide range of energy intensive industries, including steel, aluminium, glass, cement, chemicals and paper, operate fully within the ETS and are undertaking substantial investment to decarbonise their processes. At the same time, certain waste treatment activities remain outside the system's scope. In the current context of elevated energy prices, pressure on recycling markets, and competitiveness challenges for EU industry, ensuring consistency in carbon pricing across related sectors can strengthen both climate effectiveness and investment confidence.

Waste incineration represents a significant source of greenhouse gas emissions in the EU. According to CE Delft analysis<sup>1</sup>, EU waste incineration emitted approximately 43 million tonnes of fossil CO<sub>2</sub> in 2018 (79 million tonnes including biogenic CO<sub>2</sub>). Bringing these emissions within the ETS framework would reinforce the system's integrity and ensure that carbon pricing signals are applied consistently across the waste and industrial value chains.

A coherence approach would also support the objectives of the EU waste hierarchy by strengthening incentives for waste prevention, high-quality recycling and efficient resource use, while avoiding unintended distortions between treatment options. This is

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<sup>1</sup> <https://cedelft.eu/publications/waste-incineration-under-the-eu-ets-assessment-of-climate-benefits-update-2025/>

particularly relevant at a time when parts of Europe's recycling sector are facing economic strain and require stable policy signals to sustain investment and innovation.

We therefore encourage the Commission, in the context of the upcoming ETS review, to assess the appropriate inclusion of waste incineration within the system, ensuring a balanced and predictable approach that supports emissions reductions, industrial competitiveness and the transition to a circular economy.

We remain ready to engage constructively in further discussions and to contribute technical input where helpful.

Signed by the following organisations:



## **List of signatories**

Bond Beter Leefmilieu

Carbon Market Watch

Cement Europe

Chemical Recycling Europe

Citizen's Climate Europe

GEIR – European Waste Oil Re-refining Industry Association

Client Earth

CEFLEX - A Circular Economy for Flexible Packaging

European Environmental Bureau

Metal Packaging Europe

PET Europe

Reloop

Sandbag Climate Campaign ASBL

The Polyolefin Circular Economy Platform (PCEP)

ZERO – Association for the Earth Sustainability

Zero Waste Europe

WISE Nederland