



9 December 2022

Subject: Renewable Energy Directive vote and Regulation on Accelerated Permitting for RES

Dear Council Members,

You are about to vote through two pieces of legislation on renewable energy that ignore **biowaste** because it has been grouped with biomass.

Biowaste is food waste and garden waste produced by our society, our citizens and can be either a problem as a waste or a solution as a resource within Anaerobic Digestion plants. Biowaste can be a significant part of the long-term solution to the energy crisis as biogas/biomethane and a solution to fugitive methane emissions and groundwater pollution from landfilling of biowaste, instead acting as compost to remediate soil and climate.

As a secure part of both RED and the Regulation on Accelerated Permitting for RES, biowaste will provide a reliable supply of biogas/biomethane for heat, power and transport as well as compost from the composted digestate which, applied to soil, captures 30 kilograms of Carbon per ton.

In 2017, Member States already agreed to the mandate to collect biowaste separately by latest 1.1.2024. Treatment capacity for biowaste is severely lacking in all Member States and in particular in those landfilling the larger proportion of their waste. This is an **existing resource in need of treatment**, not a resource in need of harvesting.

In both of these pieces of legislation, as members of the Council, you now have the opportunity to rectify this situation by giving the requisite Greenhouse gas savings valuation to biowaste (RED Annex VI) and to **accelerate permitting for anaerobic digestion plants treating biowaste**. This permitting process should take no longer than three (3) months. We would like to clearly specify that our request is only for biowaste and to do so it is necessary to distinguish biowaste from the other biomass.

We urge you to include biowaste in the Regulation on Accelerated Permitting for RES and by doing so, ensure the successful implementation of the Waste Framework Directive as well as ensuring a reliable source of biomethane.

Vanya Veras
Secretary General, MWE

Valérie Plainemaison
Secretary General, FEAD

Contact:

Vanya Veras

Vanya.veras@municipalwasteeurope.eu

+32 491 891 858

About MWE

Municipal Waste Europe is the European umbrella association representing public responsibility for waste. Members are national public waste associations and similar national or regional associations or municipalities. MWE is committed to sustainable waste management and has an active role on promoting the waste hierarchy, resource efficiency and best practices on waste collection and treatment across the EU. Municipal Waste Europe also advocates waste management as an indispensable service of public interest. <https://www.municipalwasteeurope.eu/>

About FEAD

FEAD is the European Waste Management Association, representing the private waste and resource management industry across Europe, including 19 national waste management federations and 3,000 waste management companies. Private waste management companies operate in 60% of municipal waste markets in Europe and in 75% of industrial and commercial waste. <https://fead.be>