

Nordic position paper - Waste incineration and ETS

Norsk Industri (NO), Affalds- og ressourceindustrien (DK), Återvinningsindustrierna (SE), Kierrätysteollisuus ry (FI), represent the private recycling industry in the Nordic countries.

We believe that fossil carbon dioxide (CO₂) emissions from municipal waste incineration should be included under the EU ETS legislation as soon as possible. Waste incineration in Denmark and Sweden are already covered by the EU ETS. Moreover, all co-incineration facilities are covered by the EU ETS. **In order to achieve a level playing field, all waste incineration operators should bear equal climate gas emission costs.**

In the revision of the European ETS-directive in 2023, it was decided that the Commission shall present a report to the European Parliament and to the Council in which it shall assess the feasibility of including municipal waste incineration installations in the EU ETS from 2028. The report shall also contain an assessment of the potential need for an option for a Member State to opt out of including waste incineration until 31.12.2030. The Commission shall prepare the report by 31 July 2026.¹

The view of the Nordic recycling federations is that fossil CO₂ emissions from municipal waste incineration installations should be included under the EU ETS legislation as soon as possible and by 2028 as the absolute latest. Integrating municipal waste incineration in the EU ETS would encourage recycling of waste. It will also reduce the risk of tax competition between regions.

The organizations also emphasize the importance of increasing the recycling of waste. We support ambitious targets for recycling of waste. **It is crucial that waste treatment in accordance with the waste hierarchy is incentivized, so that recycling is preferred over energy recovery and landfilling.**

This position paper is prepared and supported by the following associations, organizing private waste management and recycling companies in Finland, Denmark, Sweden and Norway:

- **Kierrätysteollisuus ry - Recycling Industries of Finland (FI)**
- **Affalds- og ressourceindustrien - Danish Waste and Recycling Industries' Association (DK)**
- **Återvinningsindustrierna - Swedish Recycling Industries' Association (SE)**
- **Norsk Industri - Federation of Norwegian Industries (NO)**

¹ See Article 30 number 7 in Directive (EU) 2023/959 amending Directive 2003/87/EC establishing a system for greenhouse gas emission allowance trading within the Union and Decision (EU) 2015/1814 concerning the establishment and operation of a market stability reserve for the Union greenhouse gas emission trading system: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32023L0959>