

# Joint Declaration of the Members of the Pro 3R Coalition



of December 2021

The Pro 3R Coalition is a nation-wide network of citizens' associations, representatives, and independent individuals, with the vision of waste management based on waste prevention and the highest possible waste recycling, without further incinerators and landfills<sup>1</sup>. By this Joint Declaration, we react on the latest developments in the field of waste management in the Czech Republic, and preparation and introduction of the new Czech waste legislation. Its addressees are, in particular, the new Czech Government and the new management of the Ministry of Environment.

We are concerned about the developments in the waste management field in the Czech Republic. This regards, in particular, the completely insufficient capacity for material recycling of waste, and, on the other hand, dangerously growing capacities for its incineration, or energy recovery from waste. The numbers of projects for constructions, reconstructions, and capacity increases, of waste incinerators (ERFs<sup>2</sup>) in the Czech Republic **are not in agreement with the intent of the Czech and European legislations to focus on the circular economy principles**. Whereas the European Commission added the ERFs, similarly as coal-fired power plants, to the list of unsustainable activities<sup>3</sup> in 2020 already, as they **block development of material recycling and waste prevention**, the numbers of projects for their constructions has continued to grow in the Czech Republic, concerning both the independent incinerators (ERFs) and facilities that should form part of the heating infrastructure.

The Circular Economy Action Plan, presented by the European Commission in 2020, plans to decrease the mixed municipal waste production by half by 2030<sup>4</sup>. In this context, waste incinerators (ERFs), having fixed capacities that have to be filled with stable waste amounts for a number of years, represent a **significant obstacle in meeting the aims of the Czech waste management, as well as the European Circular Economy Action Plan**. We are afraid that these facilities could have higher capacities than necessary in the future, and it will result in the necessity of imports of waste into Czech incinerators from abroad.

Moreover, any form of waste incineration (i.e., including ERFs) has **very negative impacts both on the environment and on human health**. Incinerators release a number of toxic substances (chlorinated, as well as brominated, dioxins, polychlorinated biphenyls, polyaromatic hydrocarbons, hexachlorobenzene, mercury, etc.) into the environment, not only in emissions into the air<sup>5</sup>, but also in wastewater, and, **in particular, in incineration**

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<sup>1</sup> For more information on the Pro 3R Coalition, please see our web pages: <https://koalicepro3r.cz/>

<sup>2</sup> Energy recovery facilities.

<sup>3</sup> [https://ec.europa.eu/info/publications/sustainable-finance-technical-expert-group\\_en#files](https://ec.europa.eu/info/publications/sustainable-finance-technical-expert-group_en#files)

<sup>4</sup> <https://eur-lex.europa.eu/legal-content/CS/TXT/HTML/?uri=CELEX:52020DC0098>

<sup>5</sup> It is merely wishful thinking that toxic substances released from waste incinerators into the air are fully controlled. The most toxic substances (dioxins) are measured twice a year for 18 hours only. Their real emissions in the remaining time may be estimated only. See, for example:

**residues, often used as construction materials<sup>6</sup>. The new Czech waste legislation promotes this practice even further, but dioxins and other toxic substances may be released into the environment from the waste used in this way, and contaminate food chains<sup>7</sup>.**

The incinerators profit also from retrospective forgiving of fees for landfilling of waste reported as construction materials. Waste incineration **is not a sustainable alternative to landfilling**. Waste incineration is also a **significant source of CO<sub>2</sub> emissions, and, because of that, it significantly contributes to climate change**. Empirical data show that approximately 1.11 tons of CO<sub>2</sub> is released for each ton of incinerated waste in the EU, of which amount ca 55 % is of fossil origin<sup>8</sup>. Thus, for the above-mentioned reasons, **we do not agree with construction of any further incinerators (ERFs) in the Czech Republic**.

In the last few years, there have also increased the numbers of projects for construction of facilities for the so-called “**chemical recycling**” of waste (thermal depolymerisation, pyrolysis, etc.). These technologies are often presented as almost miraculous, although **they still give rise to a number of questions that have not been answered satisfactorily, including the question of their real impacts on the environment and human health**. These technologies also contribute to climate change significantly, and, in addition to that, a majority of them is not competitive and faces a number of problems when put into operation, because of high energy requirements and a number of operation problems<sup>9</sup>.

Because of that, we propose to the new Government, and, especially, to the new Minister of Environment:

- 1) At least, not to authorise construction of any further waste incinerators (ERFs) within the framework of the EIA process, and, thus, to apply regulation of the numbers and capacities of the authorised plans for construction of these facilities in the Czech Republic, in order that the both parameters be in accordance with the strategy for meeting the aims of circular economy<sup>10</sup>;
- 2) Enactment of an obligatory fee for waste incineration, including waste incineration with energy recovery (by the way, this is proposed, *inter alia*, also by the European Commission<sup>11</sup> and OECD<sup>12</sup>);

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[https://www.researchgate.net/publication/332246919\\_Hidden\\_emissions\\_A\\_story\\_from\\_the\\_Netherlands\\_Case\\_Study](https://www.researchgate.net/publication/332246919_Hidden_emissions_A_story_from_the_Netherlands_Case_Study)

<sup>6</sup> Waste incinerators, in fact mainly ERFs, produce up to a quarter of a million tons of slag, bottom ash and fly ash in the Czech Republic annually, at their current capacity already. This waste after incineration contains the same amount of dioxins as released in emissions into the air by all the Czech sources altogether. A high portion of it ends in construction materials without any control.

<sup>7</sup> <https://arnika.org/dioxiny-z-toxickeho-popilku-se-dostavaji-do-naseho-potravnihoretezce>

<sup>8</sup> See Graph 3 a Table 1 here: [https://zerowasteurope.eu/wp-content/uploads/2021/10/ZWE\\_Delft\\_Oct21\\_Waste\\_Incineration\\_EUETS\\_Study.pdf](https://zerowasteurope.eu/wp-content/uploads/2021/10/ZWE_Delft_Oct21_Waste_Incineration_EUETS_Study.pdf)

<sup>9</sup> [https://www.no-burn.org/wp-content/uploads/2021/11/CR-Technical-Assessment\\_June-2020\\_for-printing-1.pdf](https://www.no-burn.org/wp-content/uploads/2021/11/CR-Technical-Assessment_June-2020_for-printing-1.pdf)

<sup>10</sup> <https://arnika.org/o-nas/tiskove-zpravy/cesko-planuje-zbytecne-spalovny-palivo-ve-forme-odpadu-se-bude-muset-dovazet-ze-zahranici>

<sup>11</sup> [https://ec.europa.eu/environment/waste/studies/pdf/Screening\\_report.pdf](https://ec.europa.eu/environment/waste/studies/pdf/Screening_report.pdf)

- 3) Expanding the European Union Emissions Trading System to waste incinerators (ERFs) (this being proposed also by further European organisations<sup>13</sup>);
- 4) Introduction of obligatory measurements of chlorinated, as well as brominated, dioxins in outputs from the facilities and in emissions into the air, ideally in a semi-continuous way<sup>14</sup>;
- 5) Setting such limits for dioxin substances (PCDD/Fs and dl-PCBs) and brominated diphenylethers in waste that would prevent their entering of recyclates, and support of technologies resulting in effective degradation of these substances in waste, in accordance with the requirements of the Stockholm Convention;
- 6) Introduction of a publicly accessible database of storage, deposition, and utilisation of waste incineration residues (including both the residues from flue gas treatment, and slag and bottom ash after incineration);
- 7) Creation of a legislative framework for regulation of technologies designated as “chemical recycling” and their outputs (this being proposed also by other European organisation, including EEB<sup>15</sup>);
- 8) Setting concrete steps for higher support of waste prevention (within the framework of the Update of the Waste Management Plan of the Czech Republic) and for development of its material recycling, instead of support of waste incineration, treatment by the so-called „chemical recycling“<sup>16</sup> methods, and landfilling;
- 9) Introduction of a deposit-refund and take-back system for PET bottles<sup>17</sup> and beverage cans that would ensure at least 90% separation of plastic bottles, required by the European Union directive on the reduction of single-use plastics.

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<sup>12</sup> <https://www.oecd-ilibrary.org/docserver/9789264310377-cs.pdf?expires=1587566869&id=id&accname=guest&checksum=379E0EC1CE413275002BAD324C0D287E>

<sup>13</sup> See, for example <https://zerowasteurope.eu/library/waste-incineration-under-the-eu-ets-an-assessment-of-climate-benefits/>

<sup>14</sup> Measurements in the intervals of two weeks.

<sup>15</sup> [https://rethinkplasticalliance.eu/wp-content/uploads/2020/07/rpa\\_chemical\\_recycling\\_statement.pdf](https://rethinkplasticalliance.eu/wp-content/uploads/2020/07/rpa_chemical_recycling_statement.pdf)

<sup>16</sup> Currently, mostly technologies products of which end, in the better case, as fuels, are designated as the so-called “chemical recycling”. If this were a real recycling, these technologies would not be so questionable from the environmental point of view.

<sup>17</sup> For example, within the framework of the Act on single-use plastics.

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