

ECN's position on the review of the EU Emissions Trading System (EU ETS)

The European Compost Network (ECN), the European umbrella organisation representing the bio-waste recycling sector, would like to express its opinion regarding the assessment by the Commission of the feasibility of including waste management processes such as composting and anaerobic digestion in the EU Emissions Trading System (EU ETS).

At ECN, we strongly advocate the implementation of separate collection of bio-waste to produce high-quality recycled products in Europe. Indeed, composting and anaerobic digestion represent the best available techniques for recovering separately collected bio-waste from companies and households, and for transforming it into valuable fertilising products (i.e., compost and digestate) and biogas that can substitute fossil fuel.

The Waste Framework Directive has introduced in 2024 an obligation to separately collect bio-waste from municipal sources. Considering that more than half of the bio-waste and nearly 75% of the food waste generated in the EU still need to be captured¹, efficient separate collection and recycling of bio-waste can divert it from landfill, thereby saving million tons of CO₂ emissions² and avoiding methane emissions.

Composting and anaerobic digestion of separately collected bio-waste produce high-quality fertilising products containing sustainable nutrients that can replace mineral fertilisers and reduce EU's dependencies on imports. They also have the capacity to maintain and increase soil organic matter and replace peat in growing media, thereby saving resources, contributing to carbon sequestration and keeping our soils healthy and fertile.

In addition, the Commission should take into account the fact that, as a waste recycling process, composting and anaerobic digestion are higher up the waste hierarchy, compared to other waste treatment processes such as incineration or landfilling.

Therefore, ECN believes the inclusion of composting and anaerobic digestion in the EU ETS would undermine more than 20 years of efforts to introduce efficient separate collection and treatment of bio-waste, and to produce high-quality fertilising products. It would significantly weaken high-quality recycling of bio-waste while it is crucial to achieve the 55%

¹ Zero Waste Europe (ZWE) and Bio-based Industries Consortium (BIC), Bio-waste generation in the EU: Current capture levels and future potential – Second edition, [link](#).

² CO₂ reduction potential in European waste management, 2022, [link](#). See pages 87-88.

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greenhouse gas emissions reduction target by 2030 and the 65% recycling target for municipal waste by 2035.

The ECN urges the Commission not to include composting and anaerobic digestion under the EU ETS, as this would be counterproductive and would undermine the effective transition to a circular economy. Separate collection and recycling must be promoted and encouraged, not discouraged.

About the ECN

The ECN is the leading European membership organisation promoting sustainable recycling practices by composting and anaerobic digestion of organic resources and guarding over the quality and safe use of the recovered organic fertilisers and soil improvers. With 67 members from 27 European countries, ECN represents more than 4,500 experts and plant operators with more than 45 million tonnes of biological waste treatment capacity.