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- Swedenergy supports a New Circular Economy Action Plan. The EU exports of waste abroad have negative environmental and public health consequences in the countries of destination, while resources for the circular economy domestically are lost. Export of EU-waste must be limited and only be allowed if it is proven to be better environmentally and economically. The treatment of waste should be done within the EU where it is most efficient environmentally and economically.
- Illegal shipments of plastic waste are likely to cause severe pressures on the environment. The EU should put more focus to stop illegal shipment and treatment of waste within and outside of the EU and support efficient treatment and material and energy recovery within EU.
- Products, regardless of country of origin, must be designed so that they are long-lived, durable, reusable, and repairable. The EU should also demand that all products used within the EU must be non-toxic and be designed so that they can be recycled and recovered.
- Swedenergy agree that EU should empower consumers to contribute to the circular economy. However, too many consumers prioritize low prices before quality and environmental benefits. Therefore, more focus must be on the design of products. Production, import, export, distribution and selling of products that are designed in an environmentally unfriendly way must be restricted within EU.
- The EU must reduce waste generation. Consumption of unnecessary plastics must be limited as they often use non-renewable resources and are also harmful when they end-up in the nature.
- We agree that in the case of plastics, actions focus on reducing micro-plastics, requirements on packaging, and promotion of bio-based and biodegradable plastics. However, bio-based plastics use other resources and biodegradable plastics will still be an environmental issue if they end-up in the nature. Thus, more focus must be on production of non-toxic and recoverable plastics.
- Swedenergy agree that focus should be on internal market for secondary raw materials to ensure that they are safe, competitively priced and reliable. This provided toxic substances are not returned to the material cycle and that the market for secondary material is well-functioning. In the long term, it is not advantageous for the EU-countries to increase market shares of secondary material with the help of subsidies as it can reduce the competitiveness of European enterprises and producers. The EU should strengthen the competitiveness of European economy innovation in technology and business models entrepreneurship while focusing on business opportunities for secondary raw materials.
- Until now, the focus has been on municipal waste, but it represents less than 10% of the whole waste volume. More focus should be put on commercial and industrial waste.
- Waste-to Energy turns non-recyclable waste, in an environmentally safe way, into energy and valuable raw materials and at the same time destructs organic

components and removes unwanted and other toxic substances from the material cycles.

- Waste-to-Energy goes hand in hand with quality recycling and plays a key role by treating waste that is contaminated with substances which are not fit for recycling. In Sweden and some other European countries, there is appropriate infrastructure linking heat and process steam customers to waste-to-energy plants in order to utilise energy from waste even more efficiently. These capacities should be used and recycling of the mineral fraction of bottom ash should be acknowledged. The EU should develop legislation that promotes energy recovery of fractions that cannot be reused or recycled.
- Waste-to-Energy of residual wastes that remain after reuse and material recovery will help the EU to achieve its own energy and climate ambitions by expansion of district heating.
- The EU should introduce an EU-wide ban on landfill of combustible waste.