

***Brussels, 30 September 2025***

**To the kind attention of:**

*Ursula von der Leyen*  
President of the European Commission

and

*The College of European Commissioners*

and

*National Ministers of Environment of the European Union Member States*

**Subject: Call for a moratorium on new waste incineration in the EU**

Dear President von der Leyen, Commissioners, and National Ministers,

**We, the undersigned, call on the European Commission and EU Member States to immediately halt the approval and construction of new waste incineration facilities across the European Union.**

The EU already faces an **overcapacity crisis** of municipal waste incineration, estimated at 60 million tonnes.<sup>1</sup> After Europe meets its existing recycling and waste reduction targets, the current infrastructure will, without any doubt, meet all future needs. **Expanding incineration capacity will lock Europe into a burning materials system that directly undermines waste prevention, reuse, and recycling** — the top priorities of the EU waste hierarchy and a circular economy.

Waste incineration is increasingly recognised as a growing climate liability. As documented in recent analysis,<sup>2</sup> the carbon intensity of energy generated by incineration is higher than that of many conventional energy sources, especially when factoring in the high fossil content of residual waste — largely from plastics. The associated greenhouse gas emissions from incineration, even in energy recovery facilities, directly conflict with the EU's commitments to climate neutrality. Building new incineration facilities now would entrench high-emission infrastructure for decades, making it harder for Member States to meet their climate targets under the EU Green Deal and the Clean Industrial Deal.

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<sup>1</sup> [The case for a moratorium on incineration](#) (2023)

<sup>2</sup> [Debunking Efficient Recovery: The Performance of EU Incineration Facilities](#) (2023)

Despite improvements in emission controls, growing evidence links waste incineration to serious contamination and potential health harms.<sup>3</sup> Contrary to claims that incineration eliminates the need for landfills, up to 16 million tonnes of incineration residues (including hazardous waste) are landfilled annually.<sup>4</sup> **Communities near incinerators across Europe are exposed to very persistent and toxic pollutants such as dioxins, heavy metals, and PFAS. These have been found in soil, food, and even human bodies, and are associated with cancer, immune dysfunction, and developmental disorders.**<sup>5</sup> Even legally compliant facilities contribute to repeated, long-term, and cumulative toxic exposures that threaten public health, especially among vulnerable populations.

**A moratorium on new waste incineration infrastructure would prevent very high construction costs, unnecessarily high emissions, and harmful pollution.** It would also support a just transition toward circular economy infrastructure — such as reuse systems, composting, and advanced recycling — delivering far greater climate, health, and economic benefits. **It would also help achieve the goal of the Clean Industrial Deal: to make the EU the world leader in the circular economy.**

**We call for:**

- An immediate EU-wide moratorium on new waste incineration facilities (R1 and D10);
- National and EU strategies to phase down existing capacity; along with
- Investment in circular economy infrastructure that supports a climate-safe, environmentally-friendly, and resilient waste management.

We remain available should you require any further information or wish to discuss these recommendations in more detail.

Sincerely,

*The signatories*

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<sup>3</sup> [Waste Incineration and the Environment](#) (2024), [Biomonitoring report in Zubieta, Spain](#) (2025), [Biomonitoring report in Paris, France](#) (2025), [Biomonitoring report in Harlingen, The Netherlands](#) (2025).

<sup>4</sup> [Incineration residues in the EU: Quantities and fates](#) (2022)

<sup>5</sup> [The health impacts of waste incineration: a systematic review](#) (2020), [The life cycle approach for assessing the impact of municipal solid waste incineration on the environment and on human health](#) (2021), [Municipal Solid Waste Management and Adverse Health Outcomes: A Systematic Review](#) (2021), [Waste incineration and cancer mortality: a longitudinal controlled population-based study](#) (2023), [Residential exposure to municipal solid waste incinerators and health effects: a systematic review with meta-analysis](#) (2025)

5R Zero Sprechi	Comitato NO quarta linea inceneritore Padova
Alianza Residuo Cero	Cornwall Waste Forum St Dennis Branch
Amigos de la Tierra	Corporate Europe Observatory
Arnika - Toxics and Waste Programme	Cyklo Kuchyňa
Association Green Istria- Udruga Zelena Istra	Deutsche Umwelthilfe e.V.
Association Zeru Frazu	Dorset Climate Action Network
Associazione Culturale Pediatri	Društvo Ekologi brez meja
Associazione Culturale Pediatri	ECO EVENTI O.d.V.
Associazione Forumambientalista	EcoDigital
Associazione Rifiuti Zero Sicilia	ECOS
Biedrība "Vides Sardze" (NGO Environmental Guard)	EKO UDRUGA "NAŠ ZAVIČAJ"
Biofuelwatch	Eko-Logiczna Lubelszczyzna
BirdLife Slovakia	EKO-UNIA Ecological Association
Bond Beter Leefmilieu	Environmental association Za Zemiata
Bund für Umwelt und Naturschutz - FoE Germany	Environmental Investigation Agency
CEE Bankwatch Network	EPINE
Center for Environment	Errausketaren Aurkako Mugimendua
Centro di Ricerca Rifiuti Zero	European Environmental Bureau
CEPTA	Everyday Plastic
Changing Markets Foundation	Fair Resource Foundation
Child Rights International Network (CRIN)	Fare Eco
CI Maksimir for Zagreb	Forum Plastikfrei
Cittadini per l'aria onlus	Friends of the Earth - CEPA
ClientEarth	Friends of the Earth - SPZ, Slovakia
COLLECTIF 3R	Friends of the Earth (Cyprus)
Comitato Collesalviamo l'Ambiente	Friends of the Earth Cyprus

Friends of the Earth Europe	NGO Ecopatriotism
Friends of the Earth Malta	No Incinerator 4 Horsham Community Group
Fundación Vida Sostenible	No Plastic In My Sea
Futuro in Cenere	Noarc21
Gallifrey Foundation	Nottingham Friends of the Earth
Générations Futures	Nuovi Orizzonti Ecologici
Générations Futures	o.z. SOSNA
GLOBAL 2000	Ocean. Now!
Green liberty	OIKOLOGIKI ETAIREIA ANAKYKLOSIS
GURAS.O.S.	Plastic Change
Health and Environment Justice Support	Plastic Soup Foundation
Hnutí DUHA - Friends of the Earth Czech Republic	Polish Ecological Club Pomeranian Branch
Humusz Szövetség	Polish Zero Waste Association
ISDE	Priatelìa Zeme-CEPA
KlimaDocs e.V.	Public Environmental Center for Sustainable Development
Klimatická koalícia - Climate Coalition (Slovakia)	Reading Against the Incinerator
Komitet społeczny STOP wrocławskiej spalarni	rehab republic e. V. (Zero Waste München)
Krizni Eko Stozer Mariscina	Réseau Environnement Santé
Kyoto Club	Reset Livorno ODV
Legambiente arca di noè della saccisica	Residents Against Preston Incinerator
Les Amis de la Terre - Belgique asbl	Rete Tutela Roma Sud e Castelli Romani
Mallusk Community Action Group	Retorna
Milieukontakt Albania	Rifiuti Zero Piemonte - Zero Waste Piemonte
Montpellier Zéro Déchet	Rinascimento Green
National Society of Conservationists - Friends of the Earth Hungary	Rufiuti Zero Abruzzo
Naturvernforbundet	Shireoaks and Rhodesia Against Plastic Pyrolysis (SRAPP)

Skalica je pječné mjesto

Società cooperativa di mutuo soccorso

Spolek T.G.M. novevraty.cz

Stop Incineration North East (SINE)

Stop Ratcliffe Incinerator

Stop the Edmonton Incinerator Now! StEIN!

Stop the South London Incinerator

Surfrider Foundation Europe

TAT Montefoscoli

The Scarab Trust

Towarzystwo na rzecz Ziemi

Training and consulting center E-Circular

Trash Hero World

United Kingdom Without Incineration Network (UKWIN)

Unverpackt e.V. – Verband der Unverpacktläden

VšĮ "Žiedinė ekonomika"

We say No

Westbury Gasification Action Group / No Westbury Incinerator

WisWin

Za Zemlata/FoE Bulgaria

Zelena akcija

ZERO – Association for the Sustainability of the Earth System

Zéro Déchet Cébazat et Alentours

Zéro Déchet Dordogne

Zéro Déchet en Mayenne

Zéro Déchet Lyon

Zéro Déchet Pays Dacquois

Zéro Déchet Saint-Étienne

Zéro Déchet Strasbourg

Zero Waste Austria

Zero Waste Bad Vilbel e.V.

Zero Waste Bordeaux

Zero Waste e.V.

Zero Waste Estonia SA

Zero Waste Europe

Zero Waste France

Zero Waste Germany

Zero Waste Italy

Zero Waste Itzehoe e. V.

Zero Waste Kiel e.V.

Zero Waste Köln

Zero Waste Latvija

Zero Waste Lombardia

Zero Waste Marseille

Zero Waste Montenegro

Zero Waste Nederland

Zero Waste Pays d'Auray

Zero Waste Romania

Zero Waste Toulouse

Zero-Waste Haute-Vienne

Znepokojené matky