



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.¹ 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,² 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.

¹ [The case for a moratorium on incineration](#) (2023)

² [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.³ Contrary to claims that incineration eliminates the need for landfills, up to 16 million tonnes of incineration residues (including hazardous waste) are landfilled annually.⁴ **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.**⁵ 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

³ [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).

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

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

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

Rifiuti Zero Piemonte – Zero Waste Piemonte

Rinascimento Green

Rifiuti Zero Abruzzo

Shireoaks and Rhodesia Against Plastic
Pyrolysis (SRAPP)

Skalica je pekné miesto

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 Zemiata/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

Agence Europe