



plastic change



**Subject: Joint letter on Recycled Carbon Fuels.**

Brussels, 2 May 2018

Dear Commissioner Cañete, dear Minister Petkova, dear MEP Blanco López,

We the undersigned organisations are deeply concerned about the proposed inclusion of Recycled Carbon Fuels from non-renewable solid waste such as plastic within the definition of renewable fuels. We believe that this inclusion is a harmful distortion of the concept of renewable energy, and inconsistent with EU circular economy and climate policies. The Renewable Energy Directive was developed to promote the use of energy from renewable sources in the EU, in order to fight climate change and encourage the shift to a low-carbon economy. Fuel production from non-renewable solid waste such as plastics is equivalent to use of fossil sources, and therefore the opposite of renewable energy. This inclusion, if adopted, risks creating confusion amongst investors and other stakeholders, undermining public trust in our regulatory framework for climate and energy.

**We therefore call for integrity in renewable energy definitions and for an explicit exclusion of non-renewable solid waste from the definition of the Recycled Carbon Fuels.**

Sincerely,

Ecological Recycling Society (Greece)  
Environmental Investigation Agency (United Kingdom)  
Friends of the Earth Cyprus  
Friends of the Earth Europe  
Legambiente (Italy)  
Let's Do It Foundation (Estonia)  
NABU – Naturschutzbund Deutschland e.V. (Germany)  
Plastic Change (Denmark)  
VOICE (Ireland)  
Zero (Portugal)  
ZA Zemiata (Bulgaria)  
Zero Waste Europe

**CC:** EU Commission Director-General Dominique Rostori, Bulgarian Deputy Energy Minister Zhecho Stankov, Deputy Permanent Representative of Bulgaria to the EU Maria Koleva, Council Energy Working Group Members, Sean Kelly MEP, Fredrick Federley MEP, Claude Turmes MEP, Hans-Olaf Henkel MEP, Paloma López Bermejo MEP, Dario Tamburrano MEP, Bas Eickhout MEP, Marijana Petir MEP