



WINDEUROPE FEEDBACK ON RECYCLING CRITERIA IN AUCTIONS

The European Commission recommendation and guidance documents on renewable energy auctions recommends the Member States to use environmental and sustainability criteria as pre-qualification, award criteria or a combination of both. And recommends they should be quantitative whenever possible, for example on circularity and recyclability.

The European wind industry strongly supports the introduction of sustainability-related non-price criteria in wind energy auctions in Europe. This section spells out the wind industry's views on how governments should apply recycling and circularity criteria.

Blade recycling should be a pre-qualification criterion

Governments and national authorities **should** include blade recycling as a pre-qualification criterion for wind energy auctions. The criterion should call for commitments to meet the minimum requirement set by the European wind industry ([WindEurope 2021](#)). This is: to not send any decommissioned blades to landfill AND to re-use, recycle, or recover 100% of the decommissioned blades.

The commitment **should** apply for all blades at the end of life and, if the condition allows for it, also for blades that would be decommissioned during the lifetime due to failures, lightning strikes, or other adverse events.

Governments **could** request applicants to submit an accompanying end-of-life strategy that captures the state of the blade recycling supply chain, existing and emerging technologies, and a description of how the commitments will be implemented at the end of operations. Governments **should not** prescribe or reward specific recycling routes because most blade recycling technologies are still in various stages of maturity and blades will only be recycled several decades after the auction is held.

Other circularity criteria could be applied as award criteria

Governments **could** consider wider circularity requirements. These requirements should be applied as award criteria. Any such requirement should focus on selected key turbine components. For offshore wind auctions the foundations and the wider plant infrastructure should be excluded until a clear legal framework for offshore decommissioning is established.

In applying any such circularity criteria governments **should** reward projects that help achieve the benchmark targets for recycling of Critical Raw Materials as identified in the Critical Raw Materials Act (i.e., at least 25% of critical raw materials need to be prepared for reuse and recycling).

Governments Such reward **should** reward projects that present the most credible roadmap for delivery on the circularity criteria requirements (e.g., TRL mapping of recycling solutions, experience in recycling blades, participation in research projects...).