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ENV.B.1 – Circular Economy, Sustainable Production & Consumption

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ENV.B.1/SF
Mr Paolo Campanella
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Dear Mr Campanella,

I would like to thank you for your message of 10 February 2023 highlighting the views of the members of FEAD, the European Waste Management Association representing national waste management associations in 17 EU and EFTA countries, on the Commission's communication on biobased, biodegradable and compostable plastics.

We share many common views, notably on the challenges related to these plastics, which are already present in the waste flow. Concerning industrially compostable plastics, they do require additional attention. Waste management infrastructure and consumers often play a key role in channelling these plastics into the appropriate controlled waste treatment systems. Moreover, the substitution of non-compostable plastics by compostable ones risks slowing down the development of circular economy solutions based on reducing waste and reuse of such products. It also risks disincentivising material recycling, which is often the preferred option as it helps keeping materials in the loop for as long as possible while after composting, new feedstock needs to be sourced to make new products.

In your letter, you also emphasise the necessity of eco-design that allows for reusability and recyclability to contribute to circular economy, and advocate a stronger limitation of the use of industrially compostable plastics and a clear transposition of the goal into acts.

The new Regulation on Packaging and Packaging Waste is about stimulating improvements both in reuse and material recycling, leading to an optimised coexistence of both and maximising environmental and economic performance. Indeed, the list of mandatory applications of industrially compostable plastics, which is the outcome of our assessment of the benefits and challenges, is already very limited. Moreover, Article 8(3) of the Commission proposal explicitly channels all other packaging into material recycling, without affecting the recyclability of other waste streams.

We also agree on the importance of revising the standard EN 13432, taking into account the different composting and anaerobic digestion technologies across Europe and the results obtained to date from analyses and studies in the field. I am confident we can continue to count on FEAD insights to get this revision right.

Yours faithfully,

Emmanuelle Maire
Head of Unit