

FEAD's open letter on biobased, biodegradable, and compostable plastics

FEAD, the European Waste Management Association, welcomes the Communication on Biobased, Biodegradable and Compostable Plastics because it provides better understanding of the challenges and benefits that stem from their use.

FEAD supports the aim of the Commission to set out the conditions to ensure that the environmental impact of their production and consumption is positive. **Sustainability must remain a key element, at the heart of European legislative approaches**, to enable the development of ever less impactful products, processes and technologies.

The European Waste Management Industry contributes to making the life cycle of products more efficient and sustainable, aiming at the preservation of environment and resources, and knows the challenges related to biobased, biodegradable and compostable plastics because they are already present in the waste flow.

Therefore, we are on the side of the Commission to fight greenwashing and avoid misleading consumers and we really appreciate the most important purposes in the communication:

- **Avoid generic claims on plastic products such as 'bioplastics', 'biobased' and 'plastic free.'**
- **Ensure that the production is environmentally sustainable and does not harm biodiversity or ecosystem health**
- **Limit the use of plastics that biodegrade in the open environment only** to materials for which full bio-degradability has proven to be below a specific and evidence-based timeframe to avoid environmental harm, and to specific applications where consumption reduction or reuse are not viable options and where the full removal, collection and recycling of plastic products is not feasible
- **Limit the use of industrially compostable plastics only** to specific applications for which environmental benefits are higher than their alternatives and they do not have a negative impact on the quality of the compost and the soil
- **Compliance and certification of industrially compostable packaging against appropriate standards**, that should display the way in which they should be disposed
- **Revision of the existing European standard EN 13432** with a view to clarifying the concepts of biodegradability and compostability.
- **Biodegradability of the additives used to manufacture biodegradable or compostable plastics that should not be harmful for the environment.**

Nevertheless, FEAD believes it was a missed opportunity not to emphasise **the necessity of eco-design that allow for reusability and recyclability to contribute to circular economy**.

Recycling helps keeping materials in the loop for as long as possible while after composting and anaerobic digestion, new feedstock needs to be sourced to make new products.

Moreover, we want to call for **a stronger limitation of the use of industrially compostable plastics** and a clear transposition of the goal into acts. Legislative proposals, such as the PPWR, are capable

of reinforcing these concepts, and here again, the Commission missed the opportunity to reiterate the importance of restricting certain products by eliminating Article 8(4)¹ in the first leaked draft.

Manufacturing of industrially compostable products shall be limited to only a few specific applications, when the environmental benefits are higher than their alternatives and when they do not have a negative impact on the quality of the compost and the soil.

To this end, **we emphasise the importance of revising the standards EN 13432**, taking into account the different composting and anaerobic digestion technologies throughout Europe and the results obtained to date from analyses and studies in the field².

The scope of the revision of EN 13432 shall be to ensure a safe production of compost and fertiliser that guarantees protection of the soil from microplastics and substances of high concern, ensuring 100% degradation of the plastic in a shorter time (5-6 weeks), compared to the current standard.

EN 13432 should therefore be a consequence of the European legislative framework, preventing the proliferation of compostable plastic products and limiting the production to a short list, such as the one proposed in article 8 of the Packaging and Packaging Waste Regulation. In this way, only products complying with the standard EN 13432 can be classified and labelled as 'compostable', and it should always be specified that they are intended for industrial composting.

FEAD is the European Waste Management Association, representing the private waste and resource management industry across Europe, including 18 national waste management federations and 3,000 waste management companies. Private waste management companies operate in 60% of municipal waste markets in Europe and in 75% of industrial and commercial waste. This means more than 320,000 local jobs, fuelling €5 billion of investments into the economy every year. For more information, please contact:

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¹ “By 24 months from the entry into force of this Regulation, packaging other than that listed in paragraphs 2 and 3 shall not be manufactured from compostable plastic polymers”

² <https://hal.science/hal-03156935>