



FEAD statement against the promotion of bio-degradable plastics

April 2014

FEAD has been closely following the work of the European Parliament regarding the Commission Proposal for a Directive of the European Parliament and of the Council amending Directive 94/62/EC on packaging and packaging waste to **reduce the consumption of lightweight plastic carrier bags**.

We firmly believe that **bio-degradable plastic (whether compostable or oxo-biodegradable) should not be part of the plastic recycling chain** for the following key reasons:

1. An increased use of biodegradable plastics will inevitably mean they will become mixed with the regular plastics waste stream, which would risk damaging the properties of the recycled plastic material and make it no longer recyclable. Several studies¹ have highlighted the **negative impacts for plastics recycling of introducing more bio-degradable material** in the waste stream. The mere fact that this might happen will in any case undermine confidence in recycled plastics among manufacturers of plastic products, prompting them to switch back to virgin or primary plastic in order to avoid the risk of faulty or low quality products.

2. Biodegradable plastics cannot degrade naturally on land or in water. This means that the concern about littering and plastic bags causing problems in waterways would not be addressed by a switch bio-degradable plastic as such. The bags however, assuming they are certified according to EN 13432 and they are collected for treatment, can only degrade under special aerobic conditions, including a 12 weeks composting process with high moisture content and a degradation ratio of 90%. This is tested under laboratory conditions; reality in large scale composting processes clearly discloses that less than the demanded 90% is realised. As a consequence, remarkably amounts of biodegradable / compostable plastic compounds remain in the final compost product leading to a significant impairment of the end product quality, if no additional time-consuming and cost-intensive final processing steps are taken. In general, no packaging material should be introduced to composting or anaerobic digestion processes that aim at producing high quality organic fertilisers.

¹ TCKT study on behalf of EuPC (European Plastics Converters) titled "Impact of Degradable and Oxo-fragmentable Plastic Carrier Bags on mechanical recycling",

<http://www.plasticsconverters.eu/uploads/FINAL%20Impact%20of%20Degradable%20Plastic%20Carrier%20Bags%20on%20mechanical%20recycling.pdf>

Welsh Assembly Government, Single Use Bag Study,

<http://wales.gov.uk/docs/desh/publications/091016wastebagreporten.pdf>

3. Most European countries currently lack mandatory, and widely used, collection services for separating out and sending biodegradable bags to industrial composting facilities (biodegradable bags according to EN 13432 do not degrade in anaerobic digesters). Consumers would therefore be required to separate out the biodegradable bags from regular plastic bags, which is unlikely to happen to the extent needed, and throw them in the residual bin. Alternatively recycling facilities would be burdened with the task of separating the two types of bags, something which is currently not economically viable. All post consumer bags would therefore most likely be sent to incineration or landfilling. Carrier bags in general also tend to clog up the sorting equipment, causing delays and costs, as well as posing a health and safety risk for staff having to clear out the bags that get stuck.

Therefore, **FEAD members strongly disagree** with the suggestion as stated in the EP draft report that Member States shall take measures to ensure that very lightweight plastic carrier bags are **replaced progressively by very lightweight plastic carrier bags that are biodegradable** and compostable. We also disagree with the proposal to reduce the price for such bags by up to 50%. Instead, **we welcome measures that limit the use of all single use carrier bags**, regardless of material, and encourage reusable bags with recycled content.

FEAD members trust that you will give your best attention to our concerns.

FEAD is the European Federation representing the European waste management industry. FEAD's members are national waste management associations covering 18 Member States, Norway and Serbia. They have an approximate 60% share in the household waste market and handle more than 75% of industrial and commercial waste in Europe. Their combined annual turnover is approximately € 75 billion.

FEAD represents about 3000 companies with activities in all forms of waste management. These companies employ over 320000 people who operate around 2400 recycling and sorting centres, 1100 composting sites, 260 waste-to-energy plants and 900 controlled landfills. They play an important role in the determination of the best environmental option for waste management problems.