

Feedback reference

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User type

Business association

Organisation

Finnish Biocycle and Biogas Association / Suomen Biokierto ja Biokaasu ry

Organisation size

Micro (1 to 9 employees)

Transparency register number[379219338785-37](#)**Country of origin**

Finland

Initiative[Policy framework on biobased, biodegradable and compostable plastics](#)

The Finnish Biocycle and Biogas Association welcomes the Commission's initiative to develop a policy framework on biobased, biodegradable and compostable plastic to clarify their role in the transition to a carbon neutral economy and a toxic-free circular economy.

Finnish Biocycle and Biogas Association together with several Finnish biodegradable (bio)plastic producers and waste management companies have been assessed the bottlenecks of the recycling of biodegradable plastic. This is a horizontal issues, and the co-operation along the whole supply chain is needed: product & package producers, retailers, consumers (recycling), waste management companies, and the next life-cycle of the materials.

Now most of the biodegradable plastic among the bio-waste (such as bio-waste bags) is finally being incinerated rather than recycled, because the separation technics at the AD plants cannot make difference between fossil-based plastic and biodegradable plastic. Moreover, a waste management company is not willing to take a risk that there would non-biodegradable plastic in the fertilizer product. All these lead to the fact, that the recycling of biodegradable plastic is not happening or it is ineffective.

One of the problem is that there is not an official standard defining biodegradable requirements for plastic in anaerobic waste treatment. Now EN 13432 (Packaging: Requirements for packaging recoverable through composting and biodegradation) applies only to industrial compost plants. The increased volumes of separately collected municipal bio-waste in the Member states is expected to lead to growth in volumes also in the AD plants.

One of the problem that is not mentioned in the roadmap is potential negative effect on companies' willingness to invest. Now the companies (producers, users and recyclers of these new materials) are facing unclear legislation and remarkable differences in the implementation and interpretation between the member states.

What comes to the waste legislation, there are also challenges at the moment. e.g. a package producers or packager cannot recommend in the package, how to recycle the thing, because it is not necessarily responsible for organising the waste management. Typically a municipality is responsible in organising the collection and recycling of municipal waste, producers are responsible in organising the recycling of packages etc.