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The British House of Commons report from the Environment, Food and Rural Affairs Committee (EFRA) published on November 1<sup>st</sup> 2022 examines the issues around plastics waste and its impacts in the UK, and consequentially, abroad. The report is 56 pages long plus annexes.

As the report essentially examines the issue of plastic waste most of the text is dedicated to this. Among the final recommendations are

1. Banning the export of plastics waste from 2027
2. Have ambitious targets including on re-use
3. Accelerate the implementation of EPR and extend it to almost all businesses
4. Sustain the plastic tax and increase it over time from the current 30% recycled content exemption criteria
5. "Reinvest any income raised from applied Extended Producer Responsibility fees and the Plastic Packaging Tax into recycling infrastructure and promising areas of future research. This should support the compostable plastics and chemical recycling industries, which currently appear to offer the best means of managing necessary, but difficult to recycle plastics, such as plastic films."

What readers should understand is that the recommendations are cross-party and are the result of months of interviews and reviewing of evidence submitted to the committee. This is therefore a broad, evidence-based and public research and the recommendations can as such be considered well informed.

Specifically, on compostables, EFRA recognises a series of challenges and opportunities.

Firstly, the opportunities.

1. The Committee reminds us that the Government has established targets which include "...work towards all plastic packaging placed on the market being recyclable, reusable or compostable by 2025".
2. Specifically, the Committee recommends compostables as "a solution to difficult to recycle plastics especially where they are used for food contaminated products" (par 20). In order to achieve this and ensure their correct recovery, "By 2023, the Government should update its infrastructure roadmap to set out its plan for the future role of chemical recycling and composting within our plastics economy and waste management system. In particular, the Government must make a decision, based on the latest evidence about their impact on soil health, on the role of compostables, so that the organic recycling sector can adapt alongside the mandatory collection of food waste in 2024/25. If they are to be encouraged, the Government should adapt national targets to reflect their expected use.
3. Here the Committee adopts a long-standing BBIA policy request that *Product labelling must also be standardised to clearly indicate to consumers how they should dispose of compostable plastics and prevent them from contaminating other plastic waste streams. Labels should avoid unhelpful terms like 'biodegradable'.*

4. They recommend hypothecating the EPR fees from compostable producers to improving the organic recycling stream and for more research.  
*This should support the compostable plastics and chemical recycling industries, which currently appear to offer the best means of managing necessary, but difficult to recycle plastics, such as plastic films.*
5. When talking about the need to reduce plastic waste exports and incineration, which produces significant emissions, evidence supplied by *“many witnesses from the plastic and waste management industries said that chemical recycling and compostable plastics, combined with mechanical recycling, were likely required to wean the UK off exports and incineration.”*

The Committee also highlighted the challenges and notably previous investigations that show

6. that compostable plastics were problematic because the organic recycling sector lacks the infrastructure to process them and consumers are often confused about how to dispose of such packaging. *“We have heard similar evidence about UK infrastructure in this inquiry. “*
7. composting is lower on the waste hierarchy than mechanical recycling, and, as the Government has suggested, is less circular with a lot of the value of the plastic lost as greenhouse gas emissions.
8. Professor Miodownik (UCL) also highlighted that the compostable market is currently a *“Wild West”* of packaging, with many different types produced and various claims made about their environmental credentials.

The conclusions on compostables are (overall) very positive. We quote the whole paragraph here:

*Despite these misgivings, there appears to be an emerging consensus that compostable packaging could serve a purpose in specific, targeted applications. The Ellen MacArthur Foundation, A Plastic Planet, the British Plastics Federation and the UCL Plastic Waste Innovation Hub all argued that compostable plastics are “likely to play an important but small role in the future of sustainable packaging,” particularly hard-to-recycle, but necessary plastic products contaminated by food waste. While there are question marks over the impact on long term soil health, various studies do appear to show that compostable packaging, produced to the right standard, can be effectively disposed of alongside food—an approach already followed in Italy, Ireland and Spain. Redirecting food waste remaining on plastics into composting could also close the loop on food waste, a major greenhouse gas emitter, and help to generate more fertiliser and improve soil health. Finally, as many consumers erroneously dispose of food-contaminated flexible plastics into their organic and food waste streams compostable solutions could help the organic recycling sector, which current spends around £7.26 million per year trying to remove and dispose of conventional plastics that have contaminated their waste streams.*

For readers some notes from BBIA

- a. We have presented evidence, supplied by REAL Schemes, that at least 24 composting plants currently accept compostable caddy/bin liners and/or packaging on a regular basis. There are likely to be many more but these are those who have so far responded. These include facilities such as ENVAR’s and KEENAN Recycling’s that treat hundreds of thousands of tonnes of various biowastes annually and there are approximately 38 facilities in the UK with approvals

to treat animal by-products, that are likely to be treating food wastes and could potentially feed in compostable liners and/or packaging where they are not already doing so (subject to contamination by non-compostable items being acceptably low and preferably absent). Therefore, composting compostables is not an activity undertaken by few of the relevant facilities in the UK– it is a mainstream, regular activity. DEFRA has confirmed receiving this latest extra evidence.

- b. The statement that composting is lower on the waste hierarchy than mechanical recycling is false. Both are considered recycling when there is end of life certification for the compost e.g. PAS100
- c. There is unintentionally (or perhaps intentionally from some quarters) the view that compostables may adversely impact on soil health. However, as these materials have been on the market with current certification for 22 years, no evidence of negative impacts has ever been found. Nor has evidence of bioaccumulation of microplastics from compostables ever been shown. Therefore, the onus is upon those who cite this as a concern, to prove it.
- d. It is true compostables will only ever play a small role in the future of sustainable packaging. Indeed, the industry itself says the role is limited to circa 150KT annually in the UK versus around 2.3 million tonnes of plastics packaging put onto the market. The point being that compostables play a role where that is determined by return of biowastes through treatment to soil. Plastics are a contaminant in this role and compostables avoid that saving the industry millions in disposal costs.
- e. Infrastructure exists; the materials compost and are certified to recognised standards; labelling needs improving especially to ensure terms like biodegradable and degradable are outlawed for packaging. What is missing is the collection route, i.e., through food waste collections as in Italy, Spain, Ireland.
- f. Lastly, regarding AD. The Committee makes zero reference to AD or biogas production in its report on plastic waste. This is an omission because AD plants are significant receptors of plastic packaging waste that is stripped out by them and sent to incineration, at high cost to the biowaste management industry. Compostables can help resolve part of that wastage because they can be stripped out and composted at costs remarkably lower than incineration thus ensuring the biowaste stuck to the packaging is also recovered and not incinerated. Removing the plastic results in an average 2.75 times this weight of food waste being lost showing how much loss of yield biogas plants are unnecessarily accepting.