

Guidance for the Competition and Market Authority on advertising and marketing claims made for the use of compostable packaging in the FMCG sector

III

MARKET INFORMATION

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Competition and
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The Biodegradable and Bio-Based
Industries Association (BBiA) represents
businesses and NGOs operating in the UK
bioeconomy sector

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Introduction: Scope and Content

The Scope

This document aims to provide the CMA with guidelines from the members of Biodegradable and Biobased Industries Association (BBIA) to ascertain the correctness and validity of claims made regarding the use of biodegradable, compostable and bio-based (BCB) materials in FMCG applications, above all packaging.

With these guidelines, we attempt to assist the CMA in identifying invalid, unsubstantiated and uncertified claims made relative to the use of BCB materials (or those purporting to be) that could be construed as greenwashing or misleading and therefore disrupting markets. At the same time, we give guidelines to those claims we believe can be substantiated and are supported by standards and schemes run by independent bodies that assess and certify product conformity to a specific standard.

Content of this briefing

This document will be divided into 4 chapters:

1. Understanding the terminologies. This chapter explains what the concepts of compostability, biodegradability, bio-based, home and industrial compostability, recyclability, recycled, recycled or renewable content, mean in terms of certifiable claims related to national, international or European standards.

What is recycling of BCB products ? Here we will explain the notions of organic, mechanical and chemical recycling processes relative to claims related to “recycling” of BCB materials. We will explain when to consider a material recyclable, the relevance of labelling to this (e.g. OPRL), relevance of types of collection infrastructure (eg household or B2B closed loops, on site composting, return systems).

2. Standards and certification schemes. In this chapter we will give the principle international, European and British standards which our industry recognises (as per the BSI’s report PD CEN/TR 17910:2022, ‘Biodegradable plastics. Status of standardization and new prospects’) and provide links to the webpages of the main certifiers. We will illustrate how final products (or a ‘family’ of final products) need to be certified; discuss components and labelling looking at examples. We will mention the

Plastic Free certification and how this relates to compostable plastics. We will discuss the difference between biodegradability and compostability and how certain claims, eg '100% compostable' and '100% recyclable' need to be viewed critically.

3. We will look at the collection and disposal routes infrastructure for BCB materials and the claims made around various types of collection.
4. Finally we will make some recommendations related to marketing claims which we believe should be considered correct, and those we consider unsupported by evidence.

Chapter 1. Standards, Certifications, Labelling

How packaging is labelled can help determine consumer choices as to the products they purchase contained within the packaging itself. Therefore, to give consumers clear choices and create a level playing field in the marketplace between different packaging offers, we need to ensure that the labels and claims bear resemblance to reality.

This regards:

1. How the packaging is made. In the case of compostable packaging, certifiable claims¹ are widely used to distinguish the renewable or bio-based content of the material used. A material may be more than 90% bio-based (eg what is known as regenerated cellulose film made from cellulose fibres); or only partially bio-based, containing some content from fossil sources. Claims related to bio-based content are readily verifiable on the websites of the principle certifiers (see footnote 1) who publish the names of companies and products that those independent certification bodies have assessed and certified. We would tend to dissuade companies from making claims based upon their own assessment of bio-based content: we cannot stress enough the importance of third-party verification to ensure claims are based upon independent testing and certification (see footnote 26).
2. Suitable for Home composting. A small part of the packaging market is made from materials that are certified to disintegrate and biodegrade in a well-run, domestic home composting unit. This can take (according to the Royal Horticultural Society²) anywhere up to two years, depending upon the temperatures, mix of wastes inside, management of the unit. Relevant standards require that a home compostable packaging product will disintegrate within six months and biodegrade within 12 months in well managed units³. A claim of home compostability is no guarantee that the packaging will in fact compost if the composting unit is poorly managed and/or contents of the home composting unit are harvested for garden use sooner than 12 months after being put in.

One EU standard, accepted in the UK, relevant to the home compostability of carrier bags, is BS EN 17427⁴, published by CEN and BSI in 2022. This gives us a reasonable certainty that the product will disintegrate and biodegrade within the maximum

1 <https://www.tuv-at.be/green-marks/certifications/ok-biobased/> and <https://www.dincertco.de/din-certco/en/main-navigation/products-and-services/certification-of-products/packaging/biobased-products/>

2 <https://www.rhs.org.uk/soil-composts-mulches/composting>

3 NF T51-800, AS 5810, BS EN 17427 and TÜV Austria's OK home compost certification scheme: see www.tuv-at.be also see Dincertco's home compost certification <https://www.dincertco.de/din-certco/en/main-navigation/products-and-services/certification-of-products/environmental-field/products-made-of-compostable-materials-for-home-and-garden-composting/>

4 <https://www.en-standard.eu/bs-en-17427-2022-packaging-requirements-and-test-scheme-for-carrier-bags-suitable-for-treatment-in-well-managed-home-composting-installations/>

timescales specified in this standard, if composted in a well-managed home composting set-up, i.e. will perform according to the claim.

Home composting is a non-professional activity managed by householders and helps prevent organic wastes entering waste management systems, ie has a function as waste minimisation. Lack of standards relative to the process itself and the lack of monitoring of the process by third parties, constitute a limit to its reliability.

3. Suitable for Industrial Composting. The claim here is that a certified packaging product will disintegrate and biodegrade within industrial composting facilities within 84 and 180 days respectively, the disintegration and biodegradation pass/fail criteria being specified in BS EN 13432⁵. This standard, harmonised across the EU and also published as a British Standard since 2000, is widely tested and used, including in the UK. Generally, industrial composting facilities that complete the composting process correctly, will have no issues in handling compostable packaging and fully biodegrading them. Issues may occur on short cycle composting units widely used in Germany, for example, where the compost is only partially matured in the unit and then sent to farmers to finish the maturation process in situ. For the UK there are at least 24 industrial composting units counted as taking industrial compostable liners, packaging or both regularly⁶.
4. Both claims are relative to the performance of the products in situations where their end of life management is compatible with the standards with which they are independently certified compliant. Neither certification can guarantee that they actually will be collected and destined finally to an industrial composting unit or whether the householder has access to and uses a home composting unit. The uncertainty over end of life is similar for many products designed for either end of life waste recycling or recovery options- their final treatment depends upon factors generally outside the control of the packaging manufacturer (does the consumer use the right collection bins; does the local authority separately collect that material; is a correct waste management facility available ? etc).
5. Plastic Free. The term Plastic Free⁷ was initially promoted by the NGO A Plastic Planet who however no longer manage it. The term can be found on some compostable packaging. Most BBIA members feel that the term should only be used for the sub-set of compostable packaging products that are cellulose-based compostable packaging.

⁵ Main certifications in the UK are also from TUV Austria and Din Certco Germany.

⁶ <https://www.qualitycompost.org.uk/news/composting-compostables-in-the-uk>

⁷ <https://www.plasticfreecertification.org>

6. Closed loop/environment recycling. This occurs when a packaging application is sold or used in a determined location in which the managing operator can collect the packaging separately with a high degree of purity and have this sent to waste treatment. In the case of compostable packaging such applications mainly concern catering ware but also drinks cups. In the case of large buildings in which waste is managed independently (e.g. offices), or sites where large numbers of the public congregate and remain (stadia, theatres, cinemas, concerts, festival events etc) waste can be “ring fenced” and collected for composting. The advantage of such collections is that they can be organised along with food waste (food residues often remain stuck to the catering ware) and all composted. This increases interception rates and leads to near zero waste events (in the sense, zero to landfill/incineration).⁸

For such closed loop/environment situations the OPRL are working with BBIA to develop a label. This is at present in the final stages of development.

7. Generic claims of biodegradability.

We advise the CMA to read the “PD CEN/TR 17910:2022 Biodegradable plastics. Status of standardization and new prospects”⁹ published by CEN and the BSI in November 2022. This report lays down the currently recognised international standards on biodegradability of plastics. For packaging and non-packaging products, the currently recognised international standards, on plastics and other material types from which they can be made, relate to their treatment in managed organic waste facilities- ie designing materials whose biodegradability can be measured in a time and specific place, industrial composting (BS EN 13432 for packaging products, BS EN 14995 for plastic products and ASTM D6400 for plastic products).

Other claims related to biodegradability of plastics, not related to packaging are for products such as agricultural mulch films, which has another CEN standard, the EN 17033¹⁰. Among those standards the PAS9017 does not feature.

Claims of biodegradability of packaging, that are not backed by the certifications related to compostability, usually do not state either a place (waste treatment facility type) or

⁸ For examples see the London 2012 Olympics: <https://www.biocycle.net/london-strives-for-zero-waste-summer-olympics-2012/>; The Edinburgh Book Festival https://www.youtube.com/watch?v=r_mBTqHad_s and the Parliamentary Estate: <https://www.parliament.uk/mps-lords-and-offices/offices/commons/media-relations-group/news/uk-parliament-to-dramatically-reduce-plastic-use-through-new-compostable-products/>

⁹ <https://standardsdevelopment.bsigroup.com/projects/2022-01625#/section>

¹⁰ Certified but such schemes as <https://www.dincertco.de/din-certco/en/main-navigation/products-and-services/certification-of-products/environmental-field/biodegradable-in-soil/> and <https://www.tuv-at.be/green-marks/certifications/ok-biodegradable/>

a time within which the product may biodegrade. They generically state for example, “biodegradable in the open environment” which is usually not supported either by international standards and certifications, nor by real-life testing. Most claims are generally only backed by laboratory testing and are often sponsored by a particular company to meet the criteria of their own claims.

In May 2023 the University College London published a peer reviewed report into the scientific bibliography related to these claims and found them to be generally unsubstantiated. Indeed, they reported that “Most PAC plastics studied in the literature showed biodegradability values in the range 5–60% and would not pass the criteria for biodegradability set in the new PAS 9017 : 2020. Possible formation of microplastics and cross-linking have been highlighted both by field studies and laboratory studies”¹¹.

Claims such as those made here <https://www.polymateria.com/> and here require the CMA to investigate when packaging materials claim biodegradability. These claims may falsify the marketplace and mislead consumers into thinking the packaging will biodegrade everywhere, not only in composting. This creates contamination for composting and AD facilities, as such materials do not compost or digest; and for plastic recycling as such materials are generally unstable and not suitable for recycling.¹²



We alert the CMA to claims citing standards on biodegradability. Care should be taken when quoting a standard to distinguish between what is a Test Methodology and what is a pass/fail criterion. For example EN 14995 and EN13432 are pass/fail standards; BS 8472¹³ is a lab test methodology framework for oxodegradable plastics but sets no pass/fail criteria.

11 <https://royalsocietypublishing.org/doi/10.1098/rsos.230089>

12 See for example <https://recyclclass.eu/news/polymateria-misuses-recyclclass-recyclability-evaluation-protocols/>

13 <https://www.en-standard.eu/bs-8472-2011-methods-for-the-assessment-of-the-oxo-biodegradation-of-plastics-and-of-the-phyto-toxicity-of-the-residues-in-controlled-laboratory-conditions/>

Chapter 2: Marketing Claims

In this chapter we will examine marketing claims made by packaging companies related to terminologies which we believe to be either appropriate or inappropriate.

Examples of claims:

(a) Recyclability (with instructions or claims that a packaging is to recycle, to recycle with or is recyclable etc..)

Unverifiable claims are often made on a certain material that it is recyclable. A glaring example of this are flexible plastic films. They are rarely separately collected and even if they are, are extremely difficult to recycle back into plastics.¹⁴ Due to food contact issues, they cannot be recycled for food packaging. They may be destined for another use (waste to energy) or for export to countries where the recycling conditions are unknown (eg Turkey). Future EPR reforms will see extended kerbside collections of (non compostable) plastic film as well as supermarket bring-back flexible films schemes.

Other materials may be collected for recycling at kerb-side but have little or no facilities for their effective recycling in the UK. Tetrapak is widely collected but only has access to one small recycling plant in Yorkshire that is barely recycling a few percent of the materials entering the UK market. Yet it is labelled as recyclable. Similarly BCB materials may be labelled “compostable” but this is no guarantee that they will be effectively composted.

(b) Claims over how BCB materials are recycled

Here we list the principle forms of recycling options.

Organic recycling (composting and AD) is a common end of life option and includes industrial composting and anaerobic digestion of various biodegradable wastes such as food and garden wastes. Certified compostable packaging can be composted securely. AD plants in the UK will often strip out all packaging (of any nature) upstream of the digestion phase, and packaging (of any nature) entering most UK AD plants is not then recycled but sent to energy-from-waste combustion facilities, incinerators without energy recovery or to landfill. This is due to the nature of UK AD plants and is not common across the EU/ USA.

Mechanical recycling (eg for plastics including bioplastics such as PLA) is grinding and returning back to polymers and biopolymers. These are almost always (exception PET

¹⁴ “In the UK only 28 councils out of 410 are presently believed to be collecting a variety of consumer flexible films” source <https://www.bpf.co.uk/press/consistent-collections-of-flexible-plastics.aspx>

bottles) of a lower grade than the original polymer. Therefore one can question whether this is recycling or downcycling. In any case, mechanical recycling is widely available across the UK with 83 plants currently listed.¹⁵

Chemical recycling is not yet commercially available in the UK, but could theoretically recover traditional and bio-based plastics as chemical building blocks from which new plastics could be produced. However, this technology is still not mature either for bio-based plastics or traditional plastics.¹⁶

(c) Claims related to the intrinsic nature of the product itself

Compostability, suitable for home and/or industrial composting, independently certified compliant with at least one relevant and industry-and regulator-accepted standard. Biodegradation is the key mode of degradation during composting and natural items designed for this end of life phase disintegrate and continue to biodegrade under composting conditions. 'Biodegradable' alone should not be used as a claim for packaging as per the WRAP guidelines.¹⁷ To claim a packaging or non-packaging product's suitability for home and /or industrial composting, it must be independently certified compliant with at least one of the relevant standards referred to in the notes.¹⁸

Biodegradable. There are an abundant number of claims on packaging relative to its intrinsic biodegradability in uncontrolled environments eg in the open environment, or degradable in a landfill, or biodegradable in marine environments; claims also are common that a packaging is oxo(bio)degradable.

Some packaging may claim to be "marine biodegradable".¹⁹ Our position is that claims of marine biodegradability should not be made externally on packs even though the materials inside may indeed be certified for marine biodegradability; such claims may encourage incorrect disposal. A certification cannot, by its nature, take into account unintended leakages. As we have stated above, we believe such claims need to be investigated by the CMA as they may be unsubstantiated by real life testing.

On claims around degradation in landfill, UK Government policy and targets aim for zero biodegradable wastes to landfill as they may cause or contribute to emissions such as methane or leachates that need to be managed. No standard we know sets pass/fail criteria for item biodegradation in landfill, therefore the claim should not be used. For example the ASTM D5526-18 is a 'Standard Test Method for Determining Anaerobic Biodegradation of Plastic Materials Under Accelerated Landfill Conditions' and is used

¹⁵ <https://www.enfreycling.com/directory/plastic-plant/United-Kingdom>

¹⁶ <https://www.packaginginsights.com/news/recycling-technologies-enters-into-administration-what-next-for-advanced-recycling.html>

¹⁷ <https://wrap.org.uk/resources/guide/compostable-plastic-packaging-guidance>

¹⁸ For industrial composting BS EN 13432, BS EN 14995 or ASTM D6400. For home composting EN 17427, AS 5810-2010, NF T51-800 or TUV Austria's 'OK compost HOME' certification scheme criteria.

¹⁹ Certification exist as seen here <https://www.tuv-at.be/green-marks/certifications/ok-biodegradable>

for ‘determination of the degree and rate of anaerobic biodegradation of plastic materials in an accelerated-landfill test environment’. The document states it ‘is designed to yield a percentage of conversion of carbon in the sample to carbon in the gaseous form under conditions that resemble landfill conditions’ but goes on to instruct that ‘Claims of performance shall be limited to the numerical result obtained in the test and not be used for unqualified “biodegradable” claims’. It requires that ‘reports shall clearly state the percentage of net gaseous carbon generation for both the test and reference samples at the completion of the test. Furthermore, results shall not be extrapolated past the actual duration of the test.’²⁰

On claims for oxo(bio)degradable plastics we have seen (BSI 17910) that no British or European standards measuring pass/fail criteria of oxo(bio)degradability of plastics exist.²¹ Most claims are relative to test methodologies and not to definite outcomes in terms of time and place. We therefore believe that to claim a plastic will biodegrade because it is oxo(bio)degradable, is a claim requiring evidence and proof of real-life outcomes. Such claims are widely considered illegal across the EU, USA, Australia²². In the UK no such legislative action against the use of such claims has ever been enacted although Wales has proposed this in its Single Use Plastics legislation²³; however we call upon the CMA to verify the validity of such claims when encountered and to call for proof with long term field tests to be provided as evidence.

On claims that a biologically-derived plastic contains recycled content, an example is when plastics are made from bio-based sources but are not compostable, eg the Coca Cola “plant” bottle made from (largely) sugar cane²⁴. These plastics have functionality similar to traditional plastics.

Claims that a plastic has a bio-based content or bio-based carbon content, also often called plant-based content (see above) should include percentages of such content. Claims made relative to the bio-based content of a plastics can be supported by certifications such as TUV, Din Certco cited above who run schemes related to the standard EN 17228.²⁵ This claim is purely about the origin of the material and not its end of life. Many bioplastics have bio-based (carbon) content and the test methodology for verifying the claim is widely known and tested. In fact, unlike recycled content, it is simple to test a product taken from the market for its bio-based carbon content.²⁶

20 <https://www.astm.org/d5526-18.html>

21 PAS 9017 is a British publicly available specification that does contain some criteria on oxodegradability.

22 https://environment.ec.europa.eu/topics/plastics/single-use-plastics/eu-restrictions-certain-single-use-plastics_en and <https://www.marineconservation.org.au/which-australian-states-are-banning-single-use-plastics/> and <https://www.arnoldporter.com/en/perspectives/blogs/environmental-edge/2021/10/ca-enacts-new-law-restricting-environmental>

23 <https://www.gov.wales/ground-breaking-bill-ban-single-use-plastics-wales-and-avoid-leaving-toxic-legacy-future>

24 <https://www.packagingdigest.com/smart-packaging/coca-cola-company-introducesbioplastic-bottle>

25 <https://www.en-standard.eu/bs-en-17228-2019-plastics-bio-based-polymers-plastics-and-plastics-products-terminology-characteristics-and-communication/>

26 https://measurlabs.com/biobased-content-testing/?ppc_keyword=biobased%20content%20testing&gclid=EAlaQobChMInN-OzYrZ_gIVa4BQBh0ztQVpEAAYASAAEgKt_vD_BwE

Regarding attributed recycled or bio-based content, all of the claims in the market today, especially those related to, or on, packaging require a level of knowledge to fully comprehend the meaning – that meaning may allow that the actual content of recycled or bio-based content is zero but that some feedstock, somewhere within the producers' supply chain was recycled or was bio-based. We therefore recommend the CMA specifically consider critically the possibility to use consumer claims involving attribution.

Chapter 3: infrastructure, collections

1. Commercial composting infrastructure across the UK currently treats a total of circa 6 million tons of mainly garden wastes whilst around 40 closed In Vessel Composters are likely to be treating food waste and to date 24 facilities are accepting and composting compostable food waste bin liners, compostable packaging or both. This infrastructure is nationwide.²⁷

Composting is a natural, aerobic process in which bacteria and micro-organisms break down biodegradable materials (such as garden or food waste and compostable packaging) into humus- a natural soil improver. This often happens in the open air (open windrow) in the case of garden waste; in the case of food waste, composting obligatorily occurs within a closed building- known as in-vessel.

The quality of compost allowed freely onto the UK market is governed by the PAS 100. Any compostable packaging entering a compost plant must be compatible with the quality of compost as certified by PAS100.

2. The Anaerobic Digestion sector (around 90 to 100 are accepting food waste including industrial, back of supermarket food wastes). Some are receiving compostable liners/ packaging and front-end removing them regardless of the materials they are made of and whether they are compostable. None to date are routinely feeding compostable liners/packaging into their digesters although one DRY AD plant does accept them.²⁸ Elsewhere, all packaging is front end removed and sent to EfW, incineration or landfill facilities because AD plants in the UK are designed to remove all packaging.

Anaerobic digestion is a process in which bacteria and micro-organisms work within a sealed tank in the absence of oxygen to break down biodegradable wastes (generally those that are wet) into biogas and digestate. Biogas can be used as an energy source and the slurry, or digestate, as a fertiliser. The quality of the digestate is governed in the UK by the PAS110 certification.

Currently across the UK around 900KT of household food waste is separately collected and around 250KT goes to composting in England.

We know from BBIA members who work with the waste sector that regular B2B collections of catering ware/food service are available in around 50 of the UK's largest cities and towns, where this material is able to be collected for composting and is effectively organically recycled there. In addition there are other options outside these

²⁷ <https://www.qualitycompost.org.uk/news/composting-compostables-in-the-uk>

²⁸ <https://www.fife.gov.uk/kb/docs/articles/bins-and-recycling/household-recycling/food-waste-bags>

places – post-back, dedicated collections, and on-site organics processing units.

Currently we are unclear about whether in the future English Government policy will allow the co-collection of any compostable packaging or non-packaging items with household food waste collections. By this we mean such items as coffee pods, where some LAs may and some may not allow co-collection, after checking with their contracted biowaste waste collection and/or treatment service providers. Considering tea bags, the common practice in place for years in the UK is to include them in food waste collections and WRAP's household food waste guide includes them in its 'What can I put in my caddy?' information service leaflet.²⁹ Policy development needs to be monitored. Currently therefore we do not believe that household compostable packaging can now be labelled "collect with food waste" unless it is an item type already commonly included in household food waste collection practices such as teabags.

Below is an excerpt from some of WRAP's HH food waste guide section 6, 2021; tea bags are included in what can be put in food waste caddies.



Advantages of using compostable packaging/bin liners carrying food waste to treatment relates principally to reduced plastic contamination of outputs such as compost and digestate.

Whilst some products such as coffee pods or teabags are made from compostable materials to ensure the contents along with the materials that contain the foodstuff are both recycled at composting or AD facilities, it is likely these are stripped out by the majority of AD facilities that receive food wastes. However, it is similarly unlikely that any

²⁹ <https://wrap.org.uk/sites/default/files/2021-10/HH%20food%20waste%20guide%20section%206%202021%20final.pdf>.

plastic or aluminium coffee pods or non-compostable teabags will be recycled due to the food contamination.

Therefore the claim that a compostable product can be collected with (for example, food waste or other plastics) should be accompanied by a phrase asking the consumer to check with the Local Authority/waste operator to ensure such collection is possible. Currently there are very few LAs that will advise citizens to co-collect compostable packaging with food waste unless they are teabags.

Regarding closed loop/environment marketing claims - we are working with OPRL to define an appropriate labelling and therefore reserve our comment for now as to what claims should be made on the packaging itself. We would add however that while OPRL is just one example of how a product can be labelled for appropriate final treatment and their guidance may be an industry influencer, it is not an exclusive source for labelling.

Claims that a waste packaging product can be returned to the vendor generally occurs when there are home deliveries. Examples include Riverford³⁰ where a home delivery vendor tells the consumer she/he can return the packaging with the next collection and the waste stream is then composted commercially or on site. CMA will want to ask itself how to verify that this system is effectively working, and is not a claim like that made by Walker Crisps return packet scheme.³¹ Data collection should be made available when making this claim.

Claims that a vendor will take back are generally those which coffee chains are undertaking to take back eg coffee cups for recycling. These are mainly in store/shop.³² Data verification/auditing is needed to understand if the system is making a justifiable claim, ie effective recycling of materials is taking place at some scale.

30 <https://www.riverford.co.uk/ethics-and-ethos/thoughtful-packaging#collection>

31 <https://www.theguardian.com/environment/2018/dec/10/walkers-recycle-crisp-packets-postal-protest>

32 https://consult.defra.gov.uk/extended-producer-responsibility/extended-producer-responsibility-for-packaging/user_uploads/3.-producer-obligations---disposable-cups-takeback.pdf

Chapter 4. Conclusions and recommendations

1. A compostable packaging or non-packaging product must be identified as “industrially compostable” and/or “home compostable” adding the relevant certification body’s or bodies’ certification marks and product certification code(s).
2. The claims related to industrially and home compostable products must be supported by independent certification bodies with standards that set pass/fail criteria (these are listed above in Chapter 3). This ensures product compliance with at least one relevant standard accepted by the UK’s industry for recycling biodegradable (aka ‘organic’) wastes.
3. All packaging should be clearly labelled identifying the recycling stream in which they should be collected to avoid cross contamination. This should also include a label on plastic films to avoid including with food waste³³.
4. The compostability certification should refer to the whole finished packaging product and not to single constituents/ingredients. There are exceptions such as coffee cups and lids. Some packaging (eg teabags, sticky labels) are impossible to label therefore the marking will be on the outer pack.
5. The product certification number should be displayed within or near the product’s certification mark to enable rapid checks of the claim.
Companies should avoid making claims that a product is ‘X’% biodegradable or recyclable or compostable. See bullet points 1 and 2 above for claims relevant to product suitability for industrial and/or home composting.
6. Generic claims of biodegradability on packaging that do not adhere to standards laid down in the BSI report PD CEN/TR 17910:2022, ‘Biodegradable plastics. Status of standardization and new prospects’ should be subjected to scrutiny and at the very least, field tests should be obligatory to understand in which time frame and in which environments generic claims of biodegradability can be validated. The use of the term “biodegradable” for packaging should, in our opinion, be avoided.

33 https://consult.defra.gov.uk/extended-producer-responsibility/extended-producer-responsibility-for-packaging/user_uploads/3.-producer-obligations---disposable-cups-takeback.pdf



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