BIO-BASED AND BIODEGRADABLE
INDUSTRIES ASSOCIATION

Reply to admin@bbia.org.uk

Date: August 25th 2023

To the Public Accounts Committee
Houses of Parliament,
Westminster
London
Email : pubaccom@parliament.uk

Re : Your request for evidence on the English Government's Resource and Waste Policy as announced in 2018

Dear Sirs/Madam

This document is sent to you by the BBIA on behalf of its members.

About the BBIA

The BBIA represents UK and non UK manufacturers, developers and distributors of products, chemicals and materials that have a common identity in their sourcing (partially or totally bio-based which means derived from plant-based, renewable sources) and in their end-of-waste performance (biodegradable or compostable in various environments which could be natural – in the case of bio lubricants, in soil in the case of soil mulch films - or in industrial composting, in the case of packaging).

The BBIA was established by seven founder members in June 2015 and in 2023 comprises 35 companies which produce: biopolymers for onward conversion into products; building blocks for the chemical industry from bio-based sources that may be used in pharma, cosmetics, paints and coatings, as well as lubricants, packaging, pesticides; members also distribute and sell products in the UK market; and include associations, consultants and the Scottish IBIOIC. BBIA members represent most of the value chain in the production, conversion and treatment of compostable packaging materials.

More details about the BBIA can be found on www.bbia.org.uk including reports and research undertaken on compostable packaging, bioplastics, biodegradability and bio-based feedstocks.

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We join many other associations, including REA of which we are reciprocally members, in expressing our frustration for the extraordinarily long time scale for the implementation of serious reforms to the way in which England manages its waste.

One point on chronology, because it is important to understand: the proposals announced in 2018 were based upon evidence accumulated in the years preceding that date. This means we are still today discussing proposals using evidence which is now at least 6, maybe even 10 years old. Much of that data are now so out of date and irrelevant to 2023 as to make the proposals look almost archaic. We have a waste management system based upon reforms implemented in the 2000s by the last Labour Government, themselves based upon 1990s evidence. To sum up, we are

using waste management technologies and thinking that is thirty years old. Meanwhile, the world changed. And the world has changed dramatically since 2018.

A second point about technologies. Often one will find many proponents of new technological wonders to solve our waste issues. Please don't be fooled. We have all the technologies we need to collect, treat, recycle, dispose safely of wastes. What we do not have are the legal mandates and the finance to implement the systems we need. We ask that your focus is upon systemic change, not upon technologies. Technologies follow when we have decided the systems we require for the 22nd century.

BBIA members make materials which are useful for implementing a part of the systems we require: the collection and recovery of biowastes which are variously known as food or garden wastes. These wastes have specific issues: food waste is wet, smelly, ubiquitous, produced daily; garden waste is generally dry, produced periodically, and mostly inodorous. But both wastes biodegrade naturally and when they do, can produce a variety of outputs- if digested in a biogas plant, we obtain biogas or biomethane and liquid digestate; when composted in a compost plant, we obtain compost.

Digestates and compost are spread to soil, sometimes with agronomical benefits, sometimes less so. Digestates are rich in nutrients but can cause soil compaction, damage to worm population, leaching of nutrients into water courses and ammonia to the atmosphere. Typically, compost is less nutrient rich, is drier and is more of a carbon rich soil improver than fertiliser thus can be spread with less risk of soil or biodiversity damage.

But in both cases, the composts and digestates carry to soil everything they contain. These are not just nutrients, but also contamination from poor quality collection systems, mainly plastic. This plastic, which is shredded into tiny fragments, can accumulate in soils. Indeed, limits imposed under the PAS100 and PAS110 standards for compost and digestates, recognise that both contain a certain amount of plastics, allowing for them to spread to soil. Whilst such limits are in themselves very low, the accumulation year in year out when applied to the same soils naturally belies the small amounts spread annually. A 2023 research published[i] into the impacts of microplastics on soils indicates the seriously damaging long term negative effects microplastic accumulation creates. But this issue appears not to be recognised within the Resource and Waste strategy, despite soil, like water and air, being one of the three natural sinks in which are wastes finish. And we depend upon good quality soils for 90% of our food production.

Whilst compostable materials, that are inherently biodegradable according to international standards, such as the EN13432 recognised in the UK since 2000, are certainly not a solution to all plastic pollution, they can for sure make a large difference in those uses which are related to collecting biowastes, whose outputs are destined to soil.

The Government, in its 2018 policy announcement, recognised in fact that all packaging should be made reusable, recyclable or compostable by 2025. More recently however, the Government has reneged upon this policy, stating in various announcements that there is only a limited role for compostable packaging, such as in teabags.[ii] This is frankly surprising and incomprehensible, when the evidence we have presented to DEFRA shows the ecological and industrial benefits of using compostable materials in those applications which help wasted food to be collected and recycled- bags, bin liners, coffee pods, teabags, certain packaging containing food stuffs, catering ware which has food stuck to it. When such packaging is made of plastic there is only one route for it- disposal in incineration or landfill. When stripping out this packaging, a portion of food waste will be stripped out with it, losing the resource for composting and AD. One estimate made in 2022 shows that food waste lost in this manner can be as much as twice the plastics stripped out.[iii]

None of this plastic packaging will ever be recycled and DEFRA's failure to understand this is contrary to policies being implemented around the world, including the USA[iv] and EU[v].

We therefore call upon DEFRA to respect their 2018 commitment to make all packaging reusable, recyclable and compostable and to mandate the use of compostable packaging for those uses which improve and enhance food waste collections. Only by having single clean streams can we be sure that the food waste contained in the packaging itself will be clean and easier to treat in composting and AD.

Finally regarding the implementation of EPR systems for packaging, we recall that the producers of compostable packaging are already paying EPR fees (through PRNs) but are receiving absolutely no return for this payment. PRNs are simply a tax. In the future, once an EPR scheme is implanted, it is only ethical and fair that the producers who pay into the EPR systems have a voice in

1. how much they pay

2. how this money is used
3. regular revision of fee structures.

The monies collected for compostable packaging should be directed towards the improvement of food waste collections with this packaging. Such an EPR system exists now in Italy (BIOREPACK[vi]) and feeds back some €25 million this year to councils and waste companies collecting food waste with compostable packaging. We reject any proposal that does not give the producers a say in the use of the fees they will be compelled to pay. If this is the proposal, it simply becomes a taxation.

We thank you for your consideration.

Sincerely,

David Newman
Managing Director

[i] https://www.sciencedirect.com/science/article/pii/S0147651323007789?via%3Dihub
[ii] https://questions-statements.parliament.uk/written-questions/detail/2021-07-19/35889/
[iii] https://zerowasteeurope.eu/wp-content/uploads/2022/12/Unwrapping-the-biowaste-potential-December-2022.pdf
[iv] See the USA Inflation Reduction Act which proposes that 90% of plastics should be sourced from bio-based materials by 2043. https://www.epa.gov/inflation-reduction-act/inflation-reduction-act-programs-fight-climate-change-reducing-embodied
[v] The revision of the Packaging and Packaging Waste Directive proposes mandates for the use of compostable materials in several applications including many of those cited in this text. https://environment.ec.europa.eu/topics/waste-and-recycling/packaging-waste_en
[vi] www.biorepack.org