

GBA's feedback on the Commission's proposal for a Packaging and Packaging Waste Regulation

The German Biogas Association (GBA) welcomes the opportunity to comment on the Commission's public consultation on the revision of the packaging and packaging waste directive. The GBA supports the efforts of revising this directive as it contributes to a circular economy and helps reaching some of the goals outlined in the EU Green Deal and the Zero Pollution Action Plan.

The GBA and its members are committed to circular economy and are engaged in several activities, like the German "Aktion Biotonne", that aim to increase the quality and quantity of separately collected biowaste. Only with a high-quality input material, e.g., biowaste free of pollutants and impurities like plastics, in anaerobic digestion plants, a high-quality output material, i.e., the digestate, can be produced. This digestate is then used as organic fertilizer or soil improver in agriculture, horticulture and landscaping or used in growing media to replace peat, thus contributing to a circular economy.

We would like to emphasize that the GBA does not consider anaerobic digestion as the generally preferred option for the recycling of any packaging item, regardless of whether it is for example labelled as bio-degradable or not. This concerns especially Article 8 of the proposal of a regulation, which regulates the production and marketing of a specific and limited group of compostable packaging materials.

According to the German Biowaste Ordinance (from 1.11.2023 onwards) all bio-degradable plastics are classified as impurity and are not allowed in biowaste. The only exception in case of composting are specific bio-degradable plastic collection bags for the separate collection of biowaste from households. These bags need to comply with DIN EN 13432 or DIN EN 14995 and need to completely disintegrate <2mm within 6 weeks of composting. Anaerobic digestion is so far not considered in DIN EN 13432 or DIN EN 14995, even though it is considered as one of the best available techniques for waste treatment under the Industry Emission Directive 2010/75/EU. This needs to be addressed as anaerobic digestion is in many EU countries a common way of treating biowaste.

A technical differentiation between bio-degradable and conventional plastics in biowaste is currently not possible, neither at composting plants nor at biogas plants. A technical separation to separate bio-degradable from conventional plastics does not exist either. Most bio-degradable plastics, including compostable materials, which are currently available on the market, behave like normal plastics in the plants and hardly decompose during anaerobic digestion. In addition, bio-degradable plastics do not contain biogas potential and are not useful in the biogas process. Plastics such as foils can even damage some parts of biogas plants and cause serious problems during the operation. Therefore, bio-degradable plastics are largely sorted out before the anaerobic digestion process, along with conventional plastics and other impurities and end up in incineration plants. Bio-degradable plastics thus contribute neither to the quality nor to the quantity of the produced digestate.