Deutsche Umwelthilfe

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Environment Directorate-General
Commissioner Janez Potočnik
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Biodegradable plastic bags

Dear Commissioner Potočnik,

The German Environmental Aid has been working on subjects like waste prevention, high-quality recycling and circle economy for many years. In 2012 we started a plastic bag campaign, which aims at the implementation of a plastic bag levy in style of the Irish success model. Therefore, we appreciated your proposal for tackling the problems caused by plastic bags (IP/13/1017). This has been a strong signal for EU member states and increased the political pressure to take actions.

We have learned that European Parliament will vote on amendments referring to the draft report on the proposal for a directive of the European Parliament and of the Council amending Directive 94/62/EC on packaging and packaging waste to reduce the consumption of lightweight plastic carrier bags on March 6th. Therefore, we would like to take the opportunity and comment on one amendment we are deeply concerned about. We have significant experiences in bio plastics and would like to point out, that the amendment no. 24 (Article 1 – point 2 a (new)) with exceptions for bio plastic bags, cannot be part of the solution. We would like to set out some reasons why we think “biodegradable” plastic bags are inappropriate to reduce the amount of plastic bags and why they have no significant advantages in comparison to conventional polyethylene one-way plastic bags:

- No reduction of the amount of used and produced plastic bags – only a shift towards other materials.
- Only a small percentage of renewable resources in polylactid (PLA) plastic bags of 30-50 per cent, the rest (50-70 per cents) is still produced from fossil oil.
- Bio degradable plastic bags require more material and can be up to one third heavier than conventional plastic bags like those made from polyethylene (PE). They have to be thicker-walled to have the same tensile strength.
- Limited degradation in natural conditions – no advantage when littered. The large majority of bio degradable plastic bags can only be degraded under very special conditions specified in DIN EN 13432:
    - 90 per cent-degradation of the material within 12 weeks at constantly 60 degrees Celsius and a very high moisture level,
    - These conditions cannot be fulfilled on a normal compost heap, nature or in water.

- Neither economic nor ecologic benefits of composting bio degradable plastic bags: PLA and corn starch blends will disintegrate into water and CO_2 – there will not be any significant humus or nutrient formation and therefore there is no benefit for composters to dispose these bags.
- Recycling plastic bags can regain raw material – unlike bio degradable plastic which nearly vanishes and therefore contravenes the European Waste Hierarchy.
- No distinction between bio degradable and conventional plastic bags during bio waste treatment: bio degradable plastic bags will be sorted out as contaminants as well.
- Too slow degradation in most of the German composting plants. Most of them produce fresh compost. Therefore they do not work with composting times of up to 8 weeks which would be needed to degrade bio degradable plastic bags. This causes impurities that can result in losing their seal of quality.
- Many German composting plants do not work according to DIN EN 13432 and therefore cannot degrade bio degradable plastic bags in a right way.
- The Association of German Humus- and Soil Industry (VHE Nord e.V.) and the Quality Association of Compost (Gütegemeinschaft Kompost e.V.) both refuse to accept bio degradable plastic bags in bio waste fractions.
- Many German cities and communities prohibited the disposal of bio degradable plastic bags via bio waste under the terms of their charters.
- Problems when fermenting bio waste: many German composting plants work with upstream fermentation processes where bio degradable plastic bags are only poorly degradable and cause several problems.
- No recycling as post-consumer waste possible: no sorting fraction for bio degradable plastics in Germany – sorted out and sent for thermal recovery.
- Bio degradable plastic bags will not solve problems caused by littered plastic bags as they will not degrade in natural conditions.
- No overall environmental advantages of packaging made of bio degradable plastic according to the German Federal Environment Agency (Umweltbundesamt).
- Use of genetically modified crops to produce PLA: due to manufacturer information they use American corn which is mainly genetically modified.
- Ecological pollution due to agricultural cultivation of crops (corn): pesticides, herbicides, fertilizer and high water use.

I would be very grateful, if you might inform European decider about our arguments and consider some of these arguments, when voting on the amendments. Please, do not hesitate to contact me in case of any questions.

Yours faithfully,

Jürgen Resch
Managing Director