

## Position paper Composting packaging isn't THE solution October 2021

### Societal context

For a lot of citizens, packaging wastes represent a major environmental concern. However, the CNE reminds that:

- The share of the environmental impact of the packaging within the packaged product is only 5 to 8% of the total impact of the product (depending on the study).
- Household packaging waste represents less than 20% of household rubbish by weight.

The theme of the end of packaging is the subject of recurring debates on the best choices to be made and in this desire of the economic players to find solutions, so-called compostable packaging has arrived on the market: an idea that challenges everyone.

### Regulatory background

The CNE reminds that the European waste framework directive 2008/98/EC foresees the organic aerobic (composting) or anaerobic (methanisation) valorisation of bio-waste (kitchen and garden waste) to be returned to the soil as one of the recovery methods. The Packaging Directive 94/62 EC also includes this recovery method for packaging.

Regarding packaging's end-of-life, it should be recalled that everything that is compostable is biodegradable, but not everything that is biodegradable is automatically compostable according to the NF EN 13432 norm. Besides, this norm on packaging recoverable by composting only applies to industrial composting. Packaging that is industrially compostable is not necessarily compostable at home.

Composting at home must abide by an *ad hoc* norm according to article R543-72-3 of the environmental code. In France, the NF T 51-800 norm (November 2015) is available for economic players: "*Plastics-Specifications for plastics suitable for composting at home*" (*Plastiques-Spécifications pour les plastiques aptes au compostage domestique*).

The CNE has taken a stand in 2019 on the "*biodegradable*" allegation, asking to avoid using while talking about packaging as it is counterproductive to the desired effect (see <https://conseil-emballage.org/en/position-paper-avoiding-the-biodegradable-claim-concerning-packaging/> ).

This allegation will be banned by the AGECE law on 1<sup>st</sup> January 2022.

## Technical and scientific elements

### 1. Composting and circular economy

In the context of circular economy, composting reduces the useful life of a material (through recycling) or of a packaging object (through reuse) without adding any additional environmental benefit.

### 2. The low agronomic interest

For example, the compostable plastic materials are constituted of simple polymers (assembly of C, O, H molecules) which in general, generate CO<sub>2</sub> (carbon dioxide) and water by degradation. Therefore, these materials disappear from the compost in favour of water and CO<sub>2</sub> and do not enrich the final compost.

### 3. The reality of disintegration

Thin thicknesses of so-called compostable packaging will allow an easy degradation. For greater thicknesses, a grinding step (so a cost and an adaptation of actual industrial tools) will be necessary.

For instance, for non-grinded bottles or flasks, the degradation time is counting in months, if not years, and this does not match at all with the usual industrial or domestic composting practices.

### 4. Disruption of plastic packaging sorting

The risk of consumers incorrectly directing compostable plastic packaging to the sorting bin troubles the sorting of classic plastic packaging.

### 5. Disruption of the bio-waste stream by packaging that is not compostable

The risk of encountering those packaging in the bio-waste stream is a possible risk due to sorting errors.

## CNE's position

### The French Packaging Council does not recommend this packagings' end-of-life solution

Even if compostable packaging meets with norms and current regulations, the point in using this kind of waste management is not obvious, considering the raised points:

- Reduction of the useful life of the material
- Few (for cardboard or wooden packaging) or no (for plastic packaging) improvement of the compost produced
- Long degradation time
- Risk of disruption of the sorting for existing recycling industries.

The French Packaging Council (CNE), founded in 1997, is a forum for the different players in the packaging industry: packaging material manufacturers, packaging, and equipment manufacturers (converters), producers of consumer goods, approved collection and recovery system and operators, designers, other packaging professionals, local authorities, consumer, and environmental organisations.

The CNE, a recognised non-profit organisation, works for the Right Packaging and its main mission is to develop and disseminate better practices in designing, using, and marketing products packaging.

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