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European Biogas Association Reaction to the Roadmap on the new Circular Economy Action Plan

The European Biogas Association (EBA) welcomes the initiative of the European Commission to adopt a new Circular Economy Action Plan with the objective to boost the circular economy model in the EU and abroad. EBA welcomes the planning of new measures to establish a functioning and competitive integrated market for secondary raw materials and recommends that **circularity of biological loops is fully addressed** by

I. Enforcing the development of high-quality separate collection schemes of biowaste and other recyclables
II. Promoting the use of organic soil improving products over mineral fertilizers
III. Harnessing the decarbonization potential of circular biomethane.

Anaerobic digestion (AD) and composting are the most suitable treatment processes of biowaste:

- They employ safe and easy-to-replicate technology, from small to large scale
- They are perfectly suited for decentralized application
- They provide local jobs, especially in rural areas, and can be built and operated at relatively low cost, compared to incineration plants
- AD contributes to offset fossil fuels by generating renewable energy
- Compost and digestate will provide organic supply of nutrients to agriculture, including phosphorus which is a critical raw material.

A circular bioeconomy has a huge impact on climate change. Biomethane is an upgraded biogas which can be directly injected in the national gas grids:

- Being used in all traditional gas applications: cooking, heating, industrial processes, power generation and transport – to produce renewable fuels, such as bio-CNG and bio-LNG. All heavy goods vehicles are usually fueled with bio-CNG or bio-LNG.
- Avoiding investments in the transformation of either network infrastructure or user consumption equipment.
- Providing storage capacity, flexibility and security of energy supply.

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Many farmers have already implemented circular models to improve their activities. The development of biogas incentivizes the development of longer crop rotations with intercrops which ensures the cover of the soil all the year round, provides a shelter to biodiversity, prevents water pollution, stores carbon in the soils.

Compost and digestate have optimal fertilizing properties. They are organic fertilizers which supply nutrients to the plants and build up organic matter in soils, once applied regularly. Organic matter will help maintaining and restoring soil quality, structure and water retention capacity, which is much needed. This means that soils will not dry out quickly in summer months, when water is scarce but also that the likelihood of flooding in winter is reduced. A healthy soil also works as a huge carbon sink and therefore it can sequester even more carbon.

EBA acknowledges adverse environmental impacts of plastic sector and the risk to disrupt existing recycling chains. EBA warmly suggests the Commission to carefully assess composability and degradability of old and new biopolymers as well as the technical, environmental and economic feasibility of their collection and recycling in dedicated plants and facilities at end-of-life.

EBA welcomes the objective to reduce waste generation and strongly supports to update certain waste laws so that they further contribute to the circular economy. EBA warmly recommend the Commission to

I. Amend Annex II of waste framework directive so that AD explicitly figures as material recovery;
II. Adopt EU End-of-Waste criteria for compost and digestate;
III. Prevent incineration and landfilling of all kinds of biowaste, including sewage sludge;
IV. Enforce mandatory separate collection of all streams of biowaste, including sewage sludge – e.g. by adopting targets for separate collection
V. Remove unnecessary regulatory barriers, by way of more efficient harmonization of rules, to safe treatment of animal by-products and derived products
VI. Improve **Eurostat waste statistics** by including separate collection figures for municipal biowaste and commercial biowaste.