



**Airline Catering Association (ACA)**  
**Position Paper**

The Reduction of the Impact of Some Plastics on the Environment  
Proposal for a Directive

Brussels, September 2018

ACA and its members are very much supportive in principle of the goals set by the European Commission's proposal for a Directive on the reduction of the impact of certain plastic products on the environment. Representing members – inflight caterers – which are confronted on a daily note to large quantities of plastics, including single use ones, ACA acknowledges that this Directive is likely to have a deep impact on the way they work and operate. And that in most cases, this impact will be positive.

Whilst the intent and the political goals of the proposal should remain firm, speed should not be confused with haste and the danger of a one-size fits all piece of legislation forcing such a quick change is that, for given industries dependent on some forms of plastics, the necessary time for adaptation might be overlooked. Given the specificities of inflight catering, the ACA invites the European Parliament and the European Council to keep in mind the following aspects:

- 1) Closed-loop process: inflight catering can guarantee that its products, including single-use and reusable plastics, are processed through a controlled waste management system that is constantly monitored by States and/or regulated companies. The risk of any of its products making it outside of this system, and by extension to the beaches, the oceans or anywhere else that is in direct contact with populations, is hence not only highly unlikely, it is actually almost inconceivable, at least in the European Union and the EEA.
- 2) No light substitutes available: The weight of products used during inflight catering has a material environmental impact, particularly on long-haul flights, as the combined weight of such products has a direct correlation to fuel consumption which in turn has a direct impact on CO<sub>2</sub> emissions. Therefore, and this is especially true for long-haul flights, the lighter catering product should be preferred over heavier substitutes. It is important to note that there are today no sustainable alternatives of a similar, or lesser, weight to single used plastics readily available.
- 3) Conflicting legal obligations: Airlines and ships are required to incinerate or bury in a landfill all category 1 wastes. In the EU, some Member States take the position that 'catering waste' (as defined in Regulation 1069/2009 on health rules as regards animal by-products on the environment) includes not only food waste but also catering equipment. In the case of (single use) plastics, one must consider its high caloric value, and the fact that most of the energy used to manufacture the virgin product can be recovered during incineration. This is not the case for plastics' substitutes. As a matter of fact, the obligations under the above-mentioned Regulation act as a strong disincentive against the use of any alternatives, not in favour.
- 4) Discriminatory effects: Airlines and ships are operating under the flag state principle and their operations – and therefore the use of inflight catering equipment – are mostly international in nature (i.e. crossing EU borders). It appears however that the current wording of the proposal fails to consider the extra-territoriality of its clauses, thus potentially creating confusion, which in turn could

lead to a poor implementation and hence to discrimination between EU-registered stakeholders and those which are not but which still serve airlines or ships traveling to/from the EU.

- 5) Different kinds of plastics: Bio-plastics, biodegradable plastics and recycled plastics, which are currently included in the Directive, are much better in terms of environmental impact than alternatives made from virgin polymer raw materials. Their use should therefore be allowed. Also, there needs to be a reconsideration of how plastics are used. For instance, non-plastic material (e.g. paper, cardboard, bagasse, wood...) that need to be provided with a polymer (plastic) coating for liquid proofing or creating certain barrier characteristics (e.g. paper cups, paper packaging, cardboard packaging, other bio materials used for food and beverage packaging and/or serving equipment) should be allowed in the case the coating they use represent less than 10% of the total weight of the final product. Failing to do so will further reduce the number of substitutes.

As a conclusion, ACA wants to reiterate its full support to the principles laid down by the proposal for a Directive on the reduction of the impact of some plastics on the environment. It fosters a different, more sustainable approach, and it sheds welcome light on the negative impact single use plastics may have on the environment if not processed through a controlled waste management system. Finally, it justifies the important efforts that the inflight catering industry has been making in finding alternative solutions. But it has to allow for some flexibility in its application, notably when it comes to the above-mentioned points, and it should avoid at all costs to subject an industry to conflicting obligations, as may currently be the case.

*(Cf. Amendments proposed by ACA on the “Proposal for a Directive of the European Parliament and of the Council on the reduction of the impact of certain plastic products on the environment”.)*

*The ACA founding members [dnata, Do&Co, Gategroup, LSG Group and Newrest] represent the world’s leading onboard service providers in terms of portfolio scope, quality of products and services and geographical presence. The companies’ combined almost 130,000 employees achieve an annual turnover of € 10bn and deliver about 4.7m meals per day. For more information, please visit the website: [www.aca.catering](http://www.aca.catering)*