

Come recycle with me: Airlines warn EU's international catering waste law stalls circular economy



10 Apr 2023 --- Major airlines, airports and caterers are warning that EU animal agriculture rules are hampering their ability to recycle packaging and food waste and meet sustainability targets.

The current regulation requires that all international catering waste (ICW) is incinerated or buried to avoid animal disease outbreaks. But given the sector's robust food hygiene controls, aviation organizations have come together to argue that the rules must be reviewed since the classification of ICW as "biohazardous" is disproportionate to its real risk.

After years of lobbying, including a [joint statement](#) last year outlining the sector's recommendations for reviewing the regulation, there are signs that the issue is starting to gain traction within the European Commission (EC). In October, [MEPs posed questions](#) to the concerned EU directorates about the regulation, including the lack of a quantitative risk assessment.

KLM Royal Dutch Airlines, Air France, Lufthansa, British Airways and over 25 other aviation organizations strongly advise that the EC undertakes a quantitative risk assessment of ICW's threat to animal health as the basis for a revision to the regulation.

In the interim, the sector calls for harmonized guidance on the reuse and recycling of cabin waste across the EU, especially as some member states take the position that ICW includes not only food waste but also catering equipment.

"The authorities must adopt a scientific approach to new environmental legislation and avoid creating unwanted side effects. We ask that a proper risk assessment is conducted – not a simple and superficial risk assumption," Fabio Gamba, managing director at the Airline Catering Association (ACA), tells

PackagingInsights.

Sustainability stumbling blocks

While waste generated on flights operating within the EU can be efficiently processed, recycled and reused, the same is not true for waste from international flights originating outside the EU. In 2002, the EU introduced the Animal By-Products legislation, which classified ICW as "biohazardous waste" (Category 1) and subject to treatment by incineration or disposal by deep burial in an authorized landfill.

The sector estimates that up to 450,000 tons of "biohazardous" ICW is generated each year, which could be reduced by 40% if uncontaminated waste could be reused or recycled, according to an International Air Transport Association (IATA) report.



The EU classifies international catering waste as “biohazardous” and subject to disposal by incineration or landfill (Image credit: LSG Group).

The IATA commissioned a study by a food safety and animal health consultancy to determine ICW’s potential risks to animal health. The key findings include that there is no evidence that ICW from airlines has ever caused an animal disease outbreak.

Moreover, the legislation prevents airlines from making a positive contribution to the EU’s ambitions for a circular economy. For example, the Single Use Plastics Directive encourages the replacement of single-use plastics (SUP) with more sustainable materials, but the ICW classification means that these products cannot be recycled and bio-based alternatives cannot be bio-treated.

“ICW rules are not helping us comply with the EU and Dutch SUP legislation requiring us to reuse or recycle since the Category 1 regulation forces us to incinerate. This regulatory inconsistency is an extra impulse to change the regulation,” Bart van Lidth de Jeude, sustainability manager at KLM, tells us.

“Currently, KLM separates and recycles up to 14 different catering waste streams for intra-EU flights: why not do the same – if safe – for other parts of the world?”

Growing political support

The Dutch airline has been in contact with the EC’s directorate-general for Health and Food Safety and the cabinet of EC vice president Frans Timmermans to raise its concerns regarding the ICW regulation.

Recently, the Timmermans cabinet has indicated that it could be willing to look into this problem, with Lidth de Jeude encouraged that “this important issue is finally gaining traction in Brussels.” One cabinet member, Daniel Mes, has recognized the need to look at this issue through several tweets.

In one such tweet from February this year, Mes writes: “Airlines estimate that we burn or bury 1.4 kg of airline waste per passenger per year – the waste of 800,000 homes. Circularity is also a citizen’s wish. Team @TimmermansEU will discuss with airlines & NGOs like @zerowasteurope how Europe can recycle more cabin waste – without health risks.”

For Gamba at the ACA, the industry’s joint position and communication of this issue, which it has “hammered out for years,” is the driver behind this gradual shift in political mindset.

“But this is a hard sell and while the industry is trying to do what it can to point out the current system’s inefficiencies, one has to accept that legislative changes take time. Yet the signal we receive now is that things are finally changing for the better,” he tells us.

The sector’s belief in the growing momentum behind a potential regulatory review is echoed by Dr. Joe Leader, CEO of the International Flight Services Association (IFSA). He tells *PackagingInsights* that the IFSA and its coalition partners are reinforcing their position with “greater pressure for swift and proactive action.”



European Commission cabinet member Daniel Mes has addressed the airline waste issue on social media (Image credit: @DanielMesEU/Twitter).

Airlines against waste

KLM avoids food waste by taking the minimum amount of food on-board flights and transferring unsold drinks and smaller food items to new flights. While van Lidth de Jeude concedes that it is impossible to prevent food waste entirely due to passengers partially consuming meals, he argues that the Animal By-Products legislation exacerbates the issue.

“What was perfectly fine food on-board must all of a sudden be incinerated when it comes off-board – it does not make sense. On our intra-EU flights, we are processing food waste effectively via anaerobic digestion, turning it into biogas and compost,” he explains.



KLM has rolled out cutlery rolled into napkins and reusable trays to reduce waste (Image credit: KLM).

The airline has a goal to cut its non-hazardous residual waste in half by 2030 compared to 2011 by following the “Refuse, Reduce, Reuse and Recycle” strategy. For its catering offering, it will increase its renewable or recycled packaging by 2025 by transitioning to solutions like cutlery rolled into a napkin with a banderol instead of a SUP wrapper.

“The catering waste from our intercontinental flights represents roughly half of our total daily waste, so the Category 1 rules are a huge issue for us, especially when you take into account that most of the packaging from catering waste from intra-EU flights is recycled,” says van Lidth de Jeude.

KLM has increasingly turned to reusable packaging, offering rotatable solutions like trays, glasses and cutlery, which it is allowed to dishwash. It also experiments with plastic packaging that can be reused in a closed-loop system and introduced reusable plastic food containers to its Premium Comfort class last year.

Meanwhile, the IATA is leading a coalition between EU and US stakeholders to demonstrate that the segregation of uncontaminated reusable and recyclable cabin materials is feasible on a large scale.

Reusable or recyclable plastic packaging is also advantageous for its relative light weight. As Gamba at the ACA explains, the weight of products used during inflight catering has a significant environmental impact – particularly on long-haul flights – and a direct correlation to fuel consumption and CO2 emissions.

“Therefore, lighter catering products should be preferred over heavier substitutes, but there are today only limited alternatives of a similar or lesser weight to SUP options,” he says.

“Moreover, bioplastics, biodegradable plastics and recycled plastics are much better for environmental impact than alternatives made from virgin polymer raw materials, but they are currently included in the SUP Directive.”

By Joshua Poole

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