

Position of European Bioplastics

BIODEGRADABLE PLASTICS IN THE SINGLE-USE CONTEXT

On 28 May 2018, the European Commission presented a proposal for a Directive on the reduction of the impact of certain single-use plastic (SUP) products on the environment. The proposal is part of a wider framework of policy initiatives¹ in the European Union aimed at reducing plastic waste and particularly focuses on reducing marine litter.

The Directive proposes measures to restrict and reduce a selection of certain SUP products such as food containers, cups, cutlery, wipes, and straws. According to the Commission, these products are amongst the most littered SUP items found on European beaches today. However, the proposal fails to assess the potential positive impacts of the already introduced measures in the revised EU waste legislation,² including higher targets for separate waste collection and mechanical and organic recycling. In view of the aim for better regulation, such impacts should be assessed before additional actions are suggested in order to make sure that they tie in efficiently.

The provided proposal does not yet provide a definition of 'readily available more sustainable alternatives'. Biodegradable plastics could be such an alternative, because they help to close the loop by being organically recyclable.

European Bioplastics (EUBP) stresses that the problem of marine litter should be tackled primarily by enforcing the waste legislative measures of the approved waste and packaging law.

European Bioplastics urges the European Commission, the European Parliament and the Council of the European Union to consider biodegradable plastics in upcoming discussions and to take into account the arguments provided in this paper.

More sustainable alternatives are readily available

The proposal specifically foresees the substitution of currently used single-use products by 'readily available, more sustainable materials'. Single-use plastic products provide safe and

hygienic packaging and catering equipment options for foods and drinks. Any alternatives must also adhere to the strict regulations of REACH and food contact approval.

EUBP echoes Vice-President Timmerman's statement that 'food safety takes preference'³ and, in this context, urges the Commission, the Parliament and the Council of the European Union to clarify 'alternatives' and to put forward a catalogue of criteria that need to be fulfilled to ensure actual sustainability.

Biodegradable single-use plastics fulfil these rigorous requirements and standards for health and safety, and can provide corresponding certifications.⁴ They are readily available and enable higher recycling quotas by the means of organic recycling.

Benefits of biodegradable plastics

The best way to deal with plastic waste of single-use items is to ensure collection, sorting and proper recycling (organic or mechanical). The proposed market restrictions on plates and cutlery disregard modern food consumption patterns and that biodegradable solutions exist for closed loop systems.

In closed systems with integrated waste management schemes, such as air travel, sport arenas, or open-air events single-use plastics are required for safety and hygiene requirements. In these cases, a restriction of single-use plastics items is of very limited to no benefit. Whether the catering service items should be compostable or mechanically recyclable⁵ depends on their contamination with food waste.

In case single-use catering items are contaminated with food waste, the use of certified compostable alternatives allows the mixed waste to be collected as a homogeneous fraction and to be recycled organically.⁶ In order to create incentives for the industry to improve product design of single use plastics, we ask that the level of extended producer responsibility schemes may vary in line with the capability of a single use plastic to be

¹ Such as the amended Waste Framework Directive and the Packaging and Packaging Waste Directive (approved by the European Parliament's plenary in early 2018) setting higher targets for recycling of packaging, introducing mandatory bio-waste collection and phasing out landfilling. Also the Plastics Strategy refers to the presented proposal.

² This is of special importance as marine litter is predominantly caused by a lack of implementation of waste legislation at national and regional level, ineffective waste management and inappropriate littering behavior (European Commission, Roadmap Reducing marine litter: action on single use plastics and fishing gear, 2018).

³ Press conference on the presentation of the Directive on the reduction of the impact of certain plastic products on the environment' on 28 May 2018 – affirmation during Q&A.

⁴ REACH: <https://echa.europa.eu/regulations/reach/understanding-reach>; food contact materials: https://ec.europa.eu/food/safety/chemical_safety/food_contact_materials_en; EUBP Fact Sheet on standards, certification and labels for bioplastics: http://docs.european-bioplastics.org/publications/fs/EUBP_FS_Standards.pdf.

⁵ The relevant harmonized standards for industrially compostable plastics / packaging are EN 13432 and EN 14995; <https://www.european-bioplastics.org/bioplastics/standards/>.

⁶ Examples for such closed event systems are e.g. the Olympic Games 2012 in London and its zero waste approach that included organically and mechanically recyclable packaging and catering products - <https://www.biocycle.net/2012/09/18/london-strives-for-zero-waste-summer-olympics-2012/>. For more information on biodegradable plastics and organic recycling – EUBP discussion paper: http://docs.european-bioplastics.org/publications/Discussion_paper_Biodegradable_plastics_to_the_Circular_Economy_in_Europe.pdf

organically or mechanically recycled and the recycling rates of that application in practice.

With regard to the category of single-use catering plastic items, a more nuanced description of the proposed action, its goal and context is required. EUBP urges the Commission, the Parliament and the Council to elaborate on this and to not miss out on benefits biodegradable bioplastics can offer.

Biodegradability in the marine environment – research and standardisation required

With regard to biodegradability in the marine environment it cannot be stressed enough that the improvement of waste management on land is an absolute priority. The largest share of marine litter consists of plastics that originate from a variety of mainly land-based sources. Biodegradable plastics that biodegrade in a specified environment (such as biodegradable agricultural mulch films on soil) prevent single-use plastics from entering the marine environment in the first place.

The property of biodegradability in the marine environment could provide valuable innovative solutions for specific applications, such as fishing gear; research and standardisation is on-going. First standards on test methods have already been developed at ISO level, and research in the framework of Commission-sponsored projects, for example on marine biodegradable plastics and fishing gear, is carried out.⁷

EUBP urges the Commission, the Parliament and the Council to clearly define the property of biodegradability in the marine environment, the scope of materials and corresponding applications where this property holds exceptional value, and to clarify that biodegradability in the marine environment is an inherent product characteristic but not an end-of-life option that should be communicated to consumers.

Conclusion

We believe that these recommendations of EUBP will help implement a directive on single-use plastics in line with the principles set out in the Circular Economy Package. We look forward to the upcoming discussions with the European institutions and hope for your consideration of our position.

About European Bioplastics

European Bioplastics represents the interests of more than 70 member companies throughout the European Union. With members from the entire value chain, European Bioplastics serves as both a contact platform and catalyst for advancing the objectives of the growing bioplastics industry. For further information, please visit <http://european-bioplastics.org>.

⁷ GHOST project: <http://www.life-ghost.eu/index.php/en/project/objectives/8-news/109-mater-bi-of-new-generation-an-italian-biodegradable-plastic-material-to-be-used-for-fishing-gears>; Open Bio project: Work package 5 In situ biodegradation <http://www.biobasedeconomy.eu/projects/open-bio/>; Until today two standards were developed for measuring the biodegradation of plastic in the marine environment: EN ISO 18830:2017 Plastics - Determination of aerobic biodegradation of non-floating plastic materials in a seawater/sandy sediment interface - Method by measuring the oxygen demand in closed respirometer; EN ISO 19679:2017 Plastics - Determination of aerobic biodegradation of non-floating plastic materials in a seawater/sediment interface - Method by analysis of evolved carbon dioxide (ISO 19679:2016)