

Bioplastics should be complementary tools to help end plastic pollution

EUBP's input to the INC-3 negotiations

European Bioplastics (EUBP) supports an ambitious instrument, which catalyses the transition to biobased plastics and leverages innovative biodegradable and compostable plastics as complementary tools to help end plastic pollution by 2040 and to ensure a carbon-neutral future. EUBP considers it vital for the instrument to enable and champion innovation to ensure the world is fit for the future and moving towards a sustainable and truly circular economy. Innovative biobased, biodegradable and compostable plastics play a substantial role in fighting plastic pollution and reducing GHG emissions and waste.

EUBP's envisaged scope for the Plastics Treaty

The measures of the future legally binding instrument should cover the whole life cycle of plastics in a circular economy approach, from raw materials extraction to their production and from design to their use consumption and disposal. Various strategies can be combined to achieve the ambitious targets, such as including the promotion of plastic alternatives and substitutes while ensuring that such substitutions contribute through their environmental and climate performance. Biobased, biodegradable, and compostable materials can provide alternatives under certain conditions.

The issue of plastic pollution is not caused by any single substance, material, or product but is rather a systemic problem resulting from the current linear plastics economy, intrinsically coupled with continuously increasing population and economic growth. It is important that the scope of the instrument covers all relevant areas that should be tackled to transition to a circular economy, including the important role that the overall bioeconomy can play in it.

The instrument should promote innovative new plastics technologies that can tackle pollution. For instance, biobased plastic feedstocks can cut GHG emissions and support non-fossil plastic production, while

biodegradable plastics can offer end-of-life solutions where other recycling technologies cannot be achieved or are not economically viable.

Definitions of biobased, biodegradable and compostable materials already exist in international (e.g., "Technical guidelines on the environmentally sound management of plastic wastes" of the Basel Convention) as well as regional standards and guidelines (e.g., CEN EN-norms). When there is no harmonized global standard or guideline, we recommend references to existing regional standards and best practices.

The transition to non-fossil biobased plastics is critical to address the growing climate impacts of plastics

To address plastic pollution at its roots and support global climate action, it should be an objective of the instrument to transition away from plastics based on virgin fossil feedstock to non-fossil alternatives.

It is positive to see that the zero draft highlights the potential for non-fossil alternatives, such as biobased plastics, to reduce GHG impacts. We would like to make the following comments concerning the provision on alternative plastics and plastic products, as described on page 13 (part II, section 3, point 'd') of the zero draft:

- The instrument should require that parties establish non-fossil targets for plastics, as the draft only 'encourages' the use of alternatives. The current provision is vague and insufficient to align the Plastics Treaty with the Paris Agreement;
- The instrument could require as a core obligation the establishment of (a) non-fossil carbon target(s) for plastics in line with an objective of moving to non-fossil plastics. This could follow the example of the EU's Sustainable Carbon Cycles initiative. The EU has set a target that at least 20% of the carbon used in chemical and plastic products should be from sustainable non-fossil sources by 2030;

- The instrument could provide recommendations for the level of (a) non-fossil carbon target(s) for plastics while allowing the countries to be more or less ambitious depending on their current national circumstances;
- The instrument should require that countries establish national action plans with measures considering their specific circumstances to meet (a) non-fossil carbon target(s) in the most effective manner. These national action plans could include the use of a range of legislative or non-legislative measures as appropriate;
- The terminology ‘alternative plastics and plastic products’ is unclear and we would support a specific provision on ‘alternatives to non-recyclable plastics’ or ‘alternatives to fossil feedstocks’ in addition to that on ‘alternative plastics and plastic products’;
- The instrument should provide references to already existing definitions and standards, both international (for example Basel Convention) and European;
- We support the EU’s position on the need for further inter-sessional work on sustainability criteria for feedstock for biobased plastics.

emissions. The instrument can be further developed to more clearly promote the use of biodegradable and compostable plastics in the provision on alternative plastics. We believe that the instrument should promote the use of certified soil biodegradable agricultural applications referencing already existing FAO guidelines. In this regard, we also would like to highlight the positive recommendation for the use of soil biodegradable mulch film in the European Commission’s Communication on biobased, biodegradable and compostable plastics. So-called oxo-degradable or oxo-biodegradable plastics however are not to be considered as biodegradable and compostable solutions and have been banned across various geographies. They should never be linked or considered as part of the biobased, biodegradable and compostable plastics category. In the European Union, oxo-degradable applications are banned (Article 5 SUPD) and EUBP believes that this ban should be equally applied and implemented internationally.

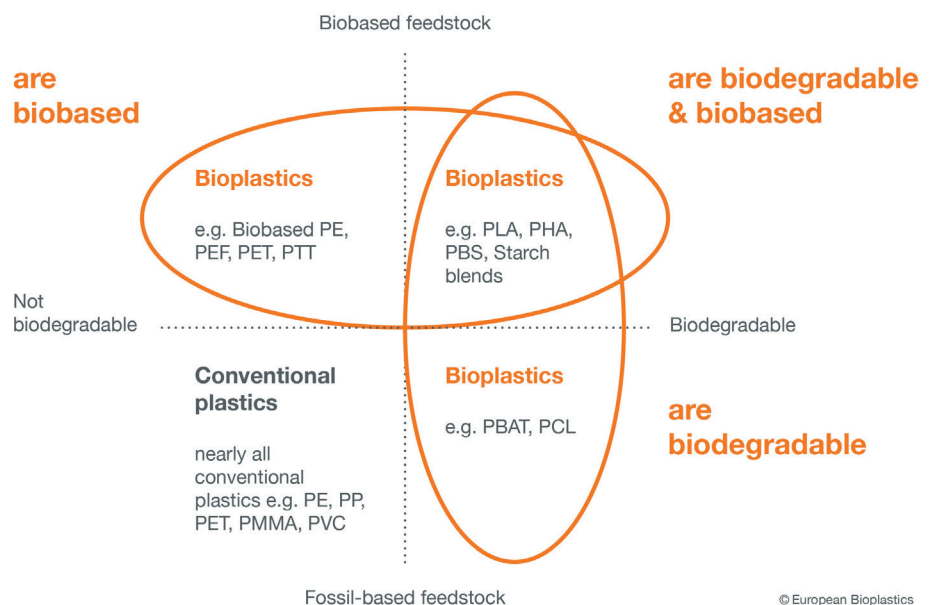
EUBP supports all material and end-of-life (EoL) treatment approaches. A level playing field should be ensured to opt for mechanical, organic, or chemical recycling, by selecting the most sustainable end-of-life treatment that delivers the best social, economic, and environmental performance and benefits. Due to lower investments and simpler technology, organic recycling can be easily established in developing countries.

Substitution with more sustainable alternatives to tackle plastic pollution

EUBP further supports reducing single-use applications coupled with the substitution of non-recyclable plastics with certified compostable material, as they can play an important role in minimising pollution with persistent microplastic whilst helping reduce overall GHG

Material coordinate system for bioplastics

Bioplastics are biobased, biodegradable, or both.



Source: Institute for Bioplastics and Biocomposites (ifBB) and European Bioplastics (EUBP)

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About European Bioplastics

European Bioplastics (EUBP) represents the interests of more than 80 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 www.european-bioplastics.org.