

Position of European Bioplastics

PROPOSAL FOR REVISED RULES ON PACKAGING AND PACKAGING WASTE

European Bioplastics (EUBP), the association representing the interests of around 80 member companies from the entire bioplastics value chain, welcomes the Commission's proposal for a revised Regulation on Packaging and Packaging Waste (PPWR)¹.

At EUBP, we believe that our innovative materials can contribute to achieving the proposal's following objectives through the adoption of targeted measures that promote solutions based on biobased as well as compostable plastics:

- **carbon neutrality:** Biobased plastics produced from sustainably sourced biomass can and will, if promoted, contribute to achieving climate neutrality by 2050 by featuring an overall significantly lower carbon footprint and reducing the need for virgin fossil-based feedstock.
- **(organic) recycling targets:** Compostable plastic packaging has been proven² to increase the capture rate of food waste for organic recycling and, at the same time, reduce the contamination of biowaste streams. Compostable plastics should be enabled for all specific packaging applications linked to food and food waste.
- **innovation:** Innovations in packaging materials and applications need to be enabled by allowing innovative materials a longer derogation period from the requirements on recyclability and recycled content targets to scale up production and recycling volumes.

We appreciate that the Commission has recognized the **important role of compostable plastics in facilitating separate biowaste collection**, which will be mandatory across Europe by December 2023, and that it increases the volume and quality of the separately collected biowaste and diverts organic waste away from incineration and other waste streams. Furthermore, compostable plastics help to reduce the contamination of organic waste streams with conventional non-biodegradable plastics and, ultimately, reduce persistent microplastics in compost. If compostable

plastics do end up in mechanical recycling streams due to misthrows, the existing sorting technologies are perfectly capable of removing them.

By mandating several packaging applications to be industrially compostable, including tea bags, coffee capsules, fruit and vegetable stickers, and very lightweight plastic carrier bags, the Commission has taken a first step in the right direction. However, EUBP insists on the need to extend the scope of compostable applications. This is because the proposed restrictions do not reflect consumer reality, stifle innovation, and create uncertainties for this sector.

- *EUBP urges EU legislators to allow for other compostable plastic packaging, that complies with the criteria set out in Annex III of the proposed PPWR and that is certified according to the harmonized EU standard EN 13432, to be placed on the market and to enter organic recycling streams.*
- *Where appropriate waste collection schemes and waste treatment infrastructures are available, Member States should have flexibility in deciding whether to mandate the use of compostable plastics for additional specific plastic packaging applications, in particular those linked to food and food waste.*

Our members are particularly concerned and alarmed by the lack of the Commission's proposal to recognize the **significant contribution of the bioeconomy and its products, including biobased plastics, towards making the packaging sector more circular and sustainable**. We argue that recyclability and reusability alone are not enough to put the packaging sector on track for climate neutrality by 2050 and to reduce the EU's dependency on fossil resources. EUBP urges the EU institutions to accelerate the uptake of biobased content equivalent to recycled content in packaging. Despite the increase in recycling and reuse, virgin raw materials will be needed, especially when strict requirements on food safety and health must be met. Biobased plastics

¹ European Commission (November 2022) proposal for a revised Packaging and Packaging Waste Regulation, https://environment.ec.europa.eu/publications/proposal-packaging-and-packaging-waste_en

² Italian compost association CIC, www.compost.it, and Zero Waste Europe (2020) "Bio-waste generation in the EU: Current capture levels and future potential." https://zerowasteurope.eu/wp-content/uploads/2020/07/2020_07_06_bic_zwe_report_bio_waste.pdf

help to reduce the environmental impact of plastics and packaging by featuring an overall significantly lower carbon footprint. Biobased plastics can be recycled in existing recycling systems with the environmental advantage to make a considerable contribution to increased resource efficiency through a closed resource cycle and use cascades.

- *EUBP calls for biobased content to count as equivalent towards the recycled content targets set out in the PPWR proposal. Both biobased and recycled content help to reduce the environmental impact of packaging by significantly reducing GHG emissions and should therefore be promoted in the same manner.*
- *Biobased plastics offer a sustainable and safe alternative for packaging applications where reuse or recycling are not an option, especially when strict requirements on food safety and consumer health must be met.*
- *Accordingly, EPR fees should promote the use of biobased content in packaging to help secure feedstock availability and decouple economic growth from the depletion of fossil resources.*

We consider it vital for the EU to **enable and champion innovation to ensure that the packaging sector is fit for the future and moving towards a sustainable and circular economy model**. The Commission's legislative proposal, however, sets overly rigid hurdles for innovative materials, which will most certainly stifle the industry's investments

into R&D of innovative materials. The current proposal risks shutting down entire European businesses in the sector and moving investments and innovation outside of Europe.

- *EUBP urges EU legislators to review the requirements on recyclability and recycled content targets for innovative materials and to allow for a 10-year derogation period for innovative materials and polymers to scale up the necessary processes and infrastructure.*
- *EUBP asks for 'natural polymers' to be clearly defined under the PPWR to guide innovation in sustainable solutions for future packaging needs. Nature-identical polymers should be treated and defined as natural polymers from the outset as they retain the original chemical structure and composition present in biomass.*

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 <http://european-bioplastics.org>.