

Position of European Bioplastics

PLASTICS STRATEGY – CONTRIBUTION OF BIOPLASTICS TO A SUSTAINABLE CIRCULAR PLASTICS ECONOMY

On 16 January 2018, the European Commission published its Communication 'A European Strategy for Plastics in a Circular Economy', meant to be an ambitious step towards making the European plastics system more resource-efficient and to drive the change from a linear to a circular system. Bioplastics¹ provide crucial impulses for innovation and the development of a sustainable, circular plastics economy by using alternative feedstocks and offering a wider scope of end-of-life options for plastic products. Both advantages have been generally recognised in the Commission's Communication. However, the proposal fails to suggest concrete legislative measures to capitalise on these benefits.

European Bioplastics (EUBP) calls on the European Parliament and the European Council to expand on the Commission's approach by introducing concrete actions in order to allow for bioplastics to unfold their full potential, thereby contributing to an evolving plastics economy.

Using alternative, bio-based feedstock for the production of plastics

Bio-based plastics act as a carbon sink, capturing renewable carbon in the material throughout the entire product life span. This benefit is magnified when bio-based products are designed for recyclability and are being reused or recycled multiple times.

Considering that even in a circular economy virgin feedstock will be needed, these demands should be met with the most sustainable option. In this context, EUBP advocates to consider bio-based resources as they will contribute greatly to defossilising the plastics economy and thereby to the transition towards a low carbon circular (bio)economy.

While the Commission's Communication acknowledges potential benefits of alternative feedstocks over virgin fossil feedstock, potential legislative measures are still lacking in the proposal.

EUBP urges the Parliament and the Council to underpin the Commission's Strategy with concrete measures to promote the use of bio-based feedstocks for the production of plastics.

Actions on EU level:

The following measures will facilitate the transition to a low-carbon, bio-based circular economy. They will boost competitiveness by providing new revenue streams for farmers, by connecting farmers and primary producers, and by facilitating the uptake of biorefinery technology across Europe.

- Promote the use of bio-based materials for the manufacturing of packaging (turn recitals 3c and 3d of the revised Packaging and Packaging Waste Directive into articles);
- Define EU-wide feedstock sustainability criteria for bio-based plastics;
- Ensure sustainability criteria for plastics feedstock are based on a level playing field vis-à-vis fossil based plastics;
- Work towards new, harmonised rules to ensure that, by 2030, 10% of all plastic packaging materials placed on the EU market are bio-based.

Biodegradable plastics – specialised solutions in a circular plastics system

The technology of biodegradable plastics is intended to facilitate bio-waste collection and organic recycling in line with the requirements of the European Packaging and Packaging Waste Directive 94/62/EC (PPWD). In this context, EUBP strongly welcomes the acknowledgment in the Plastics Strategy of the circular benefits provided by compostable plastics in targeted applications such as compostable plastic bio-waste bags.

While boosting mechanical recycling is one of the key aims of the Plastics Strategy, this target will be difficult to achieve as long as the largest fraction of municipal waste in Europe (40-50% bio-waste) is not being collected separately². Biodegradable plastics certified according to the harmonised European

¹ Bioplastics are plastics that are bio-based, biodegradable, or both.

² European Compost Network, <https://www.compostnetwork.info/policy/biowaste-in-europe/>.

standard EN 13432 for industrial compostable plastic packaging evidently help to collect more bio-waste and to divert it from other waste streams, thereby reducing the contamination of mechanically recyclable waste with organic waste.

Furthermore, organic recycling rates of compostable plastics packaging already today (68,8%) are way higher than envisaged targets for conventional plastics recycling.³ This does not only show the usefulness of such applications but is especially relevant as recent amendments to the Waste Framework Directive stipulate that compostable plastics packaging being organically recycled will be counted towards the recycling target for plastics.

Unfortunately, the Commission's Communication misses the opportunity to outline concrete measures to support the use of compostable plastics packaging solutions.

EUBP calls on the Parliament and the Council to underpin the Commission's proposal with concrete actions to make use of compostable plastics in the context of bio-waste collection and organic recycling and to define a range of criteria for compostable plastics to be considered preferable in specific applications.⁴

Curbing leakage of plastics into the environment, especially as microplastics and in the marine context, are of high priority in the Commission's Communication. EUBP echoes the Commission's statement that a sound waste management on land is the key to fighting (marine) litter.⁵ This underlines the need to make best use of compostable plastic packaging in the organic recycling context.

In addition, the Commission's Communication asks to further clarify claims around biodegradable plastics (e.g. the claim 'compostable' can mean both, industrial or home composting). EUBP will work closely with all relevant stakeholders to promote clear and unambiguous communication on correct disposal of different types of bioplastics.⁶

EUBP greatly appreciates the decision of the Commission to restrict the use of oxo-plastics in the EU and to set an example in sustainability for the global plastics community.⁷

Actions on EU level:

- Define criteria for applications, where biodegradable plastics are more suitable than conventional plastics;
- By 2030 allow, where environmentally beneficial from a life-cycle perspective, that a range of plastic packaging used for food (especially perishable foods) to be biodegradable / compostable in order that it can be organically recycled
- Restrict the use of 'oxo-degradable' plastics in the EU;
- Facilitate the implementation of existing harmonised rules, definitions, and labels for industrially compostable plastics across the EU.

The sound establishment of compostable plastics within a circular plastics economy will help to boost separate waste collection as well as to ensure waste can be recycled as valuable resource.

About European Bioplastics

European Bioplastics is the association representing the interests of the bioplastics industry along the entire value chain in Europe. Its members produce, refine, and distribute bioplastics, i.e. plastics that are either bio-based, biodegradable, or both. More information is available on www.european-bioplastics.org.

³ Corepla, CIC, Conai, and Assobioplastiche: Study on organic recycling rates of biodegradable and compostable packaging in Italy: http://www.assobioplastiche.org/assets/documenti/news/Massimo_Centemero.pdf.

⁴ European Bioplastics (2017) Discussion paper on biodegradable plastics in a circular economy:

http://docs.european-bioplastics.org/publications/Discussion_paper_Biodegradable_plastics_to_the_Circular_Economy_in_Europe.pdf

⁵ Roadmap and Consultation 'Reducing marine litter – action on single use plastics and fishing gear': https://ec.europa.eu/info/consultations/reducing-marine-litter-action-single-use-plastics-and-fishing-gear_en

⁶ A range of well-known consumer labels for biodegradable and compostable packaging in accordance with the standard EN 13432 exist since the early 1990s. These include e.g. "OK Compost Industrial" by TÜV Austria (former Vinçotte), "DIN-geprüft industriell kompostierbar" by DIN-CERTCO, "Seedling" by both TÜV Austria and DIN-CERTCO, and "Compostabile CIC" by Certiquality/CIC. These labels clearly indicate to consumers to dispose of the compostable packaging in the bio-waste, where it will be processed via organic recycling. Such labels should be promoted in connection with consumer education activities around correct disposal and waste management in a circular economy.

⁷ Ellen MacArthur Foundation / New Plastics Economy (November 2017) <https://newplasticseconomy.org/assets/doc/oxo-statement-vF.pdf>