

## *Position of European Bioplastics*

# THE ESSENTIAL ROLE OF BIOBASED CONTENT AS WELL AS RECYCLED CONTENT FOR THE TRANSITION TO A CIRCULAR PLASTICS ECONOMY

The bioeconomy holds the potential to provide innovative biobased materials and packaging solutions to ensure the sustainability and competitiveness of the EU packaging sector while decoupling economic growth from the use of fossil-based resources. Despite the ambitious climate neutrality target declared in the Green Deal, **the Commission's proposal for a revised Packaging and Packaging Waste Regulation (PPWR) misses the opportunity to support the required shift to biobased materials and processes.** Biobased plastics can and will, if enabled, contribute to the transition towards a circular economy and the EU's ambition to achieve climate neutrality by 2050 by storing and repurposing carbon dioxide. Renewable feedstock used to manufacture biobased plastics takes up biogenic carbon during the growth process, which is then stored in the products and set free at the end of life, closing the carbon loop.

European Bioplastics (EUBP) therefore urges the EU to accelerate and promote the uptake of biobased content in plastic products, especially in packaging, in the same manner as recycled content. Concretely, **we call for biobased content to count as equivalent towards the recycled content targets in the PPWR proposal.** We argue that biobased plastics produced from sustainably sourced biomass can have a positive impact on carbon neutrality as do recycled materials and should therefore be promoted in the same manner.

While mechanical recycling is a well-established technology to ensure plastic materials are kept in loop for as long as possible, it should be noted that losses are inherent to any recycling process. The mechanical impact during the recycling process negatively affects, for example, tensile strength, elongation at break, and reduce the molecular weight of the polymer(s) in each recycling loop. To fulfil the functional requirements of well performing materials, including food-contact and other contact sensitive materials, **there will always be a need for virgin feedstock, which should be brought into the system by relying on renewable, biobased resources rather than fossil-based resources.** Furthermore, the amount of waste that can be recycled is still low due to insufficient sorting infrastructure, or a lack

thereof, in the value chain. Biobased materials, either alone or in combination with recycled feedstock (mechanical and chemical recycling), are the best solution to maintain the required materials properties and fulfill market demands at the same time.

Biobased and recycled content in packaging reduce the need for virgin fossil-based resources to manufacture packaging. Focusing exclusively on recycled content and mechanical recycling will not be enough to replace the EU's dependency on fossil resources.

Both, **biobased and recycled content help to reduce the environmental impact of plastics and packaging by significantly reducing GHG emissions.** Biobased plastics can feature overall significantly lower carbon footprint during their entire life cycle, and many of them **can be recycled as well, even further lowering GHG emissions.** The Commission's own Communication on 'Sustainable Carbon Cycles' sets out the aspirational objective that at least 20% of the carbon used in chemical and plastic products should be from sustainable non-fossil resources to help reaching climate neutrality.

Not all plastic products and packaging applications can be made from recycled materials, especially when **strict requirements on food safety and consumer health must be met**<sup>1</sup>. Biobased materials are eligible for contact sensitive applications and must comply with all the strict regulations and tests when used as FCM and are a safe and sustainable solution when reuse or recycling are not an option.

### 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>.

<sup>1</sup> Currently, predominantly mechanically recycled PET is eligible for food contact approval.