

EuropaBio Comments on the Circular Economy Action Plan

January 2020

EuropaBio welcomes the foreseen new Circular Economy Action Plan and the plan to publish it with the Industrial Strategy. Industrial biotechnology is a central pillar of innovation in Europe and one of Europe's Key Enabling Technologies (KETs). It enables development of smarter, more sustainable products and processes, based on renewable raw materials, which make better use of natural resources, adding value in the process and helping to reduce GHG emissions.

Europe needs strong policy signals, measures and incentives, consolidated through its circular economy strategy, in order to engage industry in the creation of smarter products, processes and partnerships. It is important to ensure the development of a coherent, holistic, supportive policy for the circular economy and for bio-based industries along the value-chain and integrate bioeconomy and circular economy throughout EU policies. Biorefineries, where industrial biotechnology helps convert renewable feedstocks (which can include municipal solid waste, agricultural and forestry waste) into everyday products, are at the centre of the circular economy. The biorefinery model has an important role to play in contributing to 'zero waste' objectives. It will also be important to further explore the efficient use of novel biomass and future potential wastes and residues as important resources for developing the bioeconomy.

With industrial biotechnology also other materials can be recovered from organic wastes (lg. carbon or phosphates) and from sludges in biorefineries. With a view to the commercialisation of innovative bio-based products produced in biorefineries, it will be important to have 'end of waste' certification and standards in place.

We believe that the bioeconomy should be included in the future EU Circular Economy Action Plan, since the combination of both could boost the achievement of EU ambitions in fields such as climate, resource efficiency and waste.

Bio-based plastics, produced from biomass, help to decrease our dependence on fossil carbon resources and can offer significant CO₂ emissions savings. Biodegradable and compostable plastics are designed for specific applications where recycling is not an option when for example items are soiled, and can also offer a key advantage when it comes to the logistics of bio-waste recycling from households. According to the revised Waste Framework Directive, separate collection of bio-waste will be mandatory by end 2023, and thus it is expected that there will be more waste to be efficiently processed or recycled organically, thanks to home or industrial composting systems.

However, we are concerned the generic definition of "biodegradable" can be confusing. Currently, Directive 94/62/EC established the principle of 'organic recycling', which makes use of biodegradability of packaging. However, in points 3c and 3d of Annex II with the definitions of essential requirements a differentiation is made between

recoverable packaging in the form of compost (3c) and biodegradable packaging (3d), which can generate the erroneous idea that 'biodegradable packaging' is different from 'compostable packaging'. The corresponding harmonised standard EN 13432 requires conformity to the essential requirements for packaging with regard to biodegradable packaging recoverable in the form of compost in accordance with the European Directive. Therefore, clear definitions in the legislation are important.

In relation to forthcoming initiatives on packaging and waste, we believe that the benefits of using renewable resources for the manufacturing of packaging should also be reflected and equally promoted compared to recycled content.

EuropaBio welcomes the intention to address enabling conditions, such as innovation and investment opportunities for circular business models and enabling technologies. Furthermore, EuropaBio supports the continuation of an ambitious public-private partnership on circular bio-based industries, building on the BBI JU's successes.

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Media contact

Kai Künnecke, EuropaBio Communications and SME officer

Email: K.Kuennecke@europabio.org/ Telephone: +32 2 739 11 81

About EuropaBio

EuropaBio, the European Association for Bioindustries, is the recognised voice of the European biotech community championing world-class solutions for society's challenges. EuropaBio and its members are committed to the socially responsible use of biotechnology to improve quality of life, to prevent, diagnose, treat and cure diseases, to improve the quality and quantity of food and feedstuffs and to move towards a biobased and zero-waste economy. EuropaBio represents 81 corporate and associate members and bio regions, and 15 national biotechnology associations in turn representing over 1800 biotech SMEs. Read more about our work at www.europabio.org.

EuropaBio aisbl

Avenue des Arts 53, 1000 Brussels, Belgium

+32 2 735 03 13 | +32 2 735 49 60

www.europabio.org | VAT: BE 0477 520 310

