

EuropaBio comments on the roadmap on a policy framework on biobased, biodegradable and compostable plastics

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EuropaBio appreciates the opportunity to comment on the roadmap on a policy framework on biobased, biodegradable, and compostable plastics. Biobased plastics (BBP) and biodegradable and compostable plastics (BDCP) can contribute to replacing fossil carbon-based products as well as improved management of plastic already on the market whilst creating jobs, growth and competitiveness and creating value along an increasing number of biobased value chains within a circular bioeconomy.

Policy under the EU Green Deal should be developed in such a way that it enables further innovation in the bioeconomy sectors. If designed and implemented appropriately, a policy framework for BBP and BDCP could help contribute to driving innovation and sustainable development of the bioplastics industry whilst also promoting a broader range of new biomaterials which equally can replace plastics – all whilst supporting the transition to a circular bioeconomy as part of EU Green Deal ambitions. We consider it important that such a policy framework acknowledges these sectors for the important source of growth in the development of innovative products that they represent, and that it does not create biases against their introduction. Consistency and coherence with other policy instruments touching upon these sectors is also key (EU Taxonomy, the RED III, Sustainable Products Initiative, Product environment Footprint).

More specifically, increased use of BBP would also contribute solutions towards the growing need to decrease dependence on, and extraction of, fossil carbon resources while bringing additional benefits such as reduced CO₂ emissions from plastics production and sequestering atmospheric carbon. We regret that the roadmap states that the benefits of BBP should “go beyond reducing fossil carbon use” when the same is not required of other renewable sectors e.g., wind, solar, tidal, etc. The potential for BBP to contribute towards climate neutrality should not be unfairly valued.

BBP can be mechanically and chemically recycled in an efficient way. BDCP are designed for specific applications and follow specific end-of-life management where they are collected separately and organically recycled with biowaste. Mechanical, organic, and chemical recycling are all necessary, are interdependent, and should be equally promoted.

It is important to note that while certain applications of BDCP are uniquely well suited to help with the recovery and organic recycling of biowaste, we consider that policy

should not be prescriptive on applications for BBP and BDCP. Such legislation would likely hamper and limit future research and innovation in beneficial resource-efficient products (including in EU-funded projects).

Standards can help remove uncertainties and provide a sound basis for new products to be introduced into the market, thereby accelerating market entries and uptake as well as overcoming barriers caused by unclear or incompatible specifications. Standards and labelling are important for the functioning of the internal market and can provide the basis for certification and labels which, in turn, can stimulate consumer awareness, uptake and public procurement.

In light of the forthcoming policy initiative, the range of standards for BBP and BDCP already available should be duly noted and taken into consideration. Among other actions, CEN's Technical Committee 411 (CEN TC 411) has, based on a Commission mandate under its Lead Markets initiative for biobased products, developed a set of standards for biobased products, covering horizontal aspects which are relevant to consider when developing policy frameworks linked to biobased products (1).

BBP, BDCP and more broadly biomaterials can provide crucial innovative solutions for the development of a circular bioeconomy and an expanded policy framework for these should contribute to driving innovation and sustainable development of the industry.

(1) See e.g. https://www.nen.nl/media/PDF/IG_Biobased_product.pdf

