

## UNESDA SOFT DRINKS EUROPE

### Comments on roadmap for a Policy Framework on biobased, biodegradable and compostable plastics

[UNESDA Soft Drinks Europe](#) welcomes the initiative to propose a clear policy framework for the use of biobased, biodegradable and compostable plastics in the EU.

However, we believe that such a proposal should take into account the following elements:

#### **1. DEFINITIONS SHOULD BE BASED ON TRANSPARENT SCIENTIFIC PRINCIPLES**

Definitions in the context of this new policy framework must be based on scientific evidence that is widely accepted by the scientific community to guarantee credibility for consumers and a robust basis for businesses that decide to invest in, and use, these materials.

Definitions should also be applied consistently across the internal market in order to ensure a level playing field and legal certainty for food businesses. The definitions should be clear, objective, easy to use, and should clearly differentiate between BBP and BDCP. If they fail to meet these pre-requisites, businesses will be left in an uncertain situation from a legal and reputational point of view, which will not contribute to the uptake of sustainable packaging solutions.

#### **2. EXISTING SCHEME SHOULD BE USED TO PROVE SUSTAINABLE SOURCING**

Biobased plastics need to be sourced sustainably and there are already well-established third-party certification schemes (e.g. PEFC, FSC) that can prove - with robust evidence and strong chain of custody - the origin and sustainability credentials of biomass that is used in non-food applications.

We would therefore encourage the Commission to take into account these existing schemes to provide evidence of sustainable sourcing for biobased plastics. The benefits of this approach will be two-fold: providing strong evidence to enforcement authorities and to consumers, and simplifying the administrative process for companies that want to use sustainably sourced biomass-derived products or packaging in their processes. An entirely new and complex system for sustainability certification would discourage business operators that want to improve the environmental footprint of their products by using biobased plastics.

#### **3. A ROBUST, RELIABLE AND PRACTICAL MEASUREMENT FOR BIOBASED CONTENT IS NEEDED**

The measurement method to be defined for biobased content in plastics must be compatible with various technologies applied to derive plastic from plant-based raw materials e.g. pyrolysis, fermentation. Mass balance accounting is already used by market players to certify the chain of custody for biobased-derived plastic and should be considered as a valid option to measure biobased plastic content in products and packaging, as well as to make claims.

To differentiate mass balance and segregated approach, clear information to consumers should be provided that specifies the chain of custody that has been used.

#### **4. STANDARDS FOR BIODEGRADABLE & COMPOSTABLE PLASTICS SHOULD TAKE INTO ACCOUNT EXISTING STANDARDS**

Standards to be developed for the technical definition of biodegradable and compostable plastics should take account of, and ensure compatibility with, existing internationally recognised standards.



For example, TUV Austria certifies industrial compostable products based on the EN 13432 standard. Currently, TUV certifies home compostable products using a modified EN 13432 with testing in ambient conditions and accordingly increased timelines.

#### **5. POLICY ALIGNMENT ON CLAIMS AND LABELLING IS NEEDED**

There are several policy initiatives that are being examined that should result in clarity around environmental labelling and claims to consumers. How information is provided to the consumer should be fully harmonised to avoid proliferation of national initiatives.

It is important that information to the consumer on BBP and BDCP is presented in a way that is complimentary: to future product sustainability information (as foreseen by the future legislative framework for sustainable labelling); to green claims that may refer to the product or packaging; and to the overall environmental footprint information.

#### **6. ONGOING DEVELOPMENTS IN WASTE MANAGEMENT SHOULD BE TAKEN INTO ACCOUNT**

The use of BDCP should not be subject to a closed list of products or applications. As waste management continues to develop and evolve, the assessment of suitability of biodegradable or compostable plastic for a given application should account for the availability of suitable waste and recycling infrastructure to manage other material types. This will ensure the best outcome can be achieved without creating unnecessary barriers to the lowest impact solution.