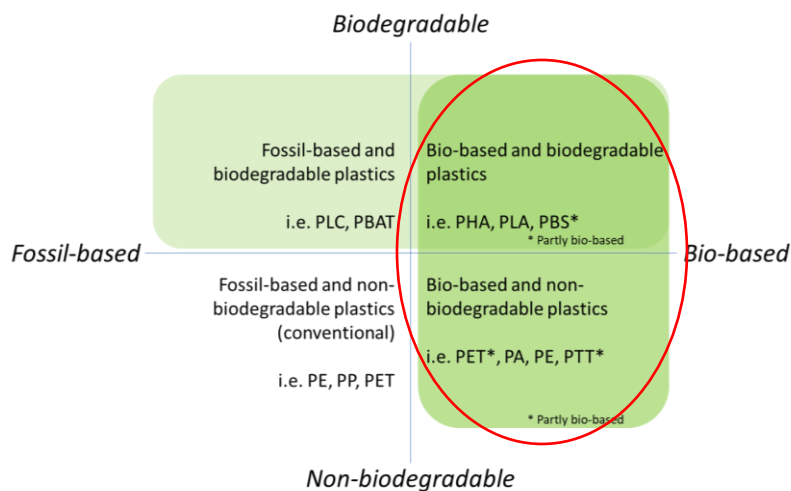


# Improved policies are needed to stimulate the deployment of bio-based plastics as a pillar of the Green Deal ambitions of the EU

## FOREWORD

In the context of the forthcoming Policy Framework on bio-based, biodegradable and compostable plastics, Cefic is of the view that a single approach that combines bio-based plastics and biodegradable and compostable plastics would be confusing and fail to address the specificities of each category of plastic. We have therefore developed two separate position papers, that complement each other.



A policy initiative aiming at framing the development of bio-based plastics in the European Union should focus on the enablers and conditions for a switch to alternative feedstocks that can contribute to the Green Deal ambitions, in particular the net-zero emissions one, as well as the target for restoring sustainable carbon cycles.

Given that plastics are today a key element of our modern life, and will still be crucial in the future, they need to be made more sustainable and more circular. In that respect, bio-based plastics that can have proven environmental and climate benefits, e.g. based on LCA methodologies that take into account the biogenic carbon credit (such as ISO 14067, EN 16760), can play a critical role as well as contribute to

achieving the “Fit for 55” and climate neutral economy ambitions, as well as the restoration of sustainable carbon cycles.

Bio-based plastics, including certified mass-balanced plastics derived from biomass, can provide sustainable solutions to Europe’s need for lightweight, versatile, durable and affordable materials with lower carbon footprint compared to the fossil-based equivalent for the same intended purposes. Like with fossil-based plastics, they must be recycled to ensure minimal impact on the environment and enhance circularity. Some bio-based plastics can be biodegradable and compostable (see separate position).

Europe is a pioneer in this field, thanks to a series of measures that have marked the history of the sector, enabling its development. To continue being a leader in the field, we recommend these measures form the basis for the implementation of a dedicated policy framework for bio-based plastics.

### **Considerations:**

When developing a policy framework for bio-based plastics, we call on EU policymakers to follow the same steps as when bio-based products/plastics were first introduced to the market (such as the Lead Market Initiative for bio-based products which the Commission sponsored for 2 mandates). It should also give special consideration to:

- Clarity and consistency of the **terminology and definitions**, in order to avoid any possible confusion on the markets, especially for product claims intended for end consumers. In that respect, definitions and terminology drawn from existing standards policy initiatives and legislative acts served as cornerstones and should do so in the future. The Commission’s Staff Working Document accompanying ‘A European Strategy for plastics in a circular economy’ addresses the issue by giving the correct definitions of the various terminologies (bio-based, biodegradable, compostable, etc.) and should serve as a basis with further additions such as material based on the mass balance<sup>a</sup> approach following existing standards.
- Relevant, enabling and swiftly applicable **sustainability criteria** for feedstocks including land-use change and biodiversity safeguards, that take into account the particularities of the bio-based sector. Material already exists, even if not harmonised, either from existing European legislation (e.g. REDII Article 29 (2-7)) or from standardisation processes prepared on European Commission mandates (Standard EN 16751:2016)), but also from credible certification systems such as ISCC PLUS, RSPO, FSC, PEFC, RSB, etc. To enable a successful uptake of the bioeconomy, industry should be able to operate in an environment where a level playing field to access renewable feedstock is created for all market players when it comes to sustainability requirements. In this regard, the use of existing infrastructure also contributes to a rapid and effective contribution of the bio economy towards the EU’s sustainability goals as well as the promotion of specific

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<sup>a</sup> Chain of Custody model in which materials or products with a set of specified characteristics are mixed according to defined criteria with materials or products without that set of characteristics. (ISO 22095)

Nomenclature of Economic Activities (NACE) codes allowing to help identify bio-based products (including feedstocks, intermediates and end products) in statistics and make their importance, impacts and benefits more visible. Biomass (including from waste and residual streams) should be used in an optimised way, particularly when the availability of sustainable biomass might be limited and the demand growing.

- Level playing field on the **biofeedstocks markets**: Mechanisms that support feedstocks availability, competitiveness and market demand should be introduced. In addition, the continued access to feedstocks complying with sustainability requirements (as provided in REDII Article 29 (2-7)) is needed and current feedstocks must be maintained alongside the development of new ones.
- Transparent, and third-party certified **chain-of-custodies**. To stimulate market uptake for bio-based plastics, there should be clear and understandable claims, allowing for customers and consumers to be adequately informed on the product and its sustainability characteristics.
- Unleashing **research and innovation**: research and innovation activities funded by the European Commission under Horizon 2020 (including the BBI-JU) and under Horizon Europe (including the CBE-JU<sup>b</sup>) would be needed to develop materials that are biomass-efficient, cost-efficient, fit for purpose and recyclable. They should also allow for the identification and development of new raw materials suitable for the production of bio-based plastics.
- A supportive **policy framework** concerning the classification of bio-based plastics (e.g. with regards to feedstocks and end-of-life aspects) should be an opportunity for the market uptake of bio-based plastics. At present, EU and national legislative initiatives, such as national plastic taxes, Extended Producer Responsibility (EPR) schemes or public procurement criteria, show very limited or no support for the use of circular bio-based plastics.
- A consistent **Life Cycle Analysis that takes into account the biogenic carbon credits (such as ISO 14067, EN 16760)**, should support the claimed environmental benefits.

**Recommendations to be considered including in other relevant policy initiatives, such as the Sustainable carbon cycles one :**

- **Incentivise** the use of bio-based plastics with demonstrable environmental and recyclability benefits and the increase in bio-based content for example by:
  - setting feasible targets (including by securing competitive availability of biomass) via product policies
  - modulating the Extended Producer Responsibility (EPR) scheme obligations to recognise better the merits of bio-based materials in such a way as to take into account the renewable content of products, provided that a sustainable benefit is also demonstrated and that the content considered can also include certified renewable products through a certified mass balance approach.
  - promoting the preference for sustainable bio-based plastics into green public procurement.

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<sup>b</sup> <https://www.cbe.europa.eu/>

- Introduce harmonized and consistent accounting for CO<sub>2</sub> benefits of using biobased raw materials in the value chain
- Introduce clear and harmonised **labelling** to increase transparency and improve credibility of the green claims. A right definition/identification of sustainability criteria which capture benefits of bio-based products is essential and a prerequisite to support this option.
- Increasing the knowledge and **awareness** of the positive contribution of bio-based plastics in the public, especially at schools and universities. Trigger sustainability education and training and enhance qualification courses towards industrial production and use of sustainable materials.

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About Cefic

Cefic, the European Chemical Industry Council, founded in 1972, is the voice of large, medium and small chemical companies across Europe, which provide 1.2 million jobs and account for 16% of world chemicals production.