

“Bio-base equivalence” contributes to a more circular and sustainable packaging

In the range of options to improve the sustainability and circularity of packaging materials and of Europe’s economy, biomass-derived¹ content must be seen as a viable complementary alternative to increased recycled content.

Background

In the preparatory discussions of the revision of the Packaging and Packaging Waste Directive, the possibility that sustainable biomass-derived content was considered as contributing to achieving the circularity ambitions has been suggested (Economia impact assessment, Questionnaire of the online stakeholders consultation on biobased, biodegradable and compostable plastics). It seems that the proposal that will be tabled on 30th of November will ignore that possibility, hence making the fulfilment of waste reduction and circularity ambitions more challenging.

The ultimate goal should prevail

BioChem Europe and its members welcome the revision of the Packaging and Packaging Waste Directive and the intention to further improve the sustainability and circularity of packaging materials. They see the latter and the carbon neutrality objective as the overarching ambition that should prevail. They are convinced that all potential contributions should be considered and encouraged instead of adopting restrictive approaches when it comes to the ways and means to achieve these goals. This would be consistent with the intentions of the Commission’s

¹ bio-based and bio-attributed

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Communication on Sustainable Carbon Cycles that aim primarily at reducing the extraction and use of more fossil carbon in Europe's economy².

BioChem Europe and its members therefore call for clear recognition of the positive role that biomass-derived materials can play in fulfilling them – also when food contact regulations limit feedstocks usage -, provided some realistic conditions are set:

- A clear and visible distinction should be made between the biomass-derived content and the recycled one in communication towards the consumer, to avoid confusing statements.
- The possibility of a biomass-derived content contribution to the PPWD targets should be seen as complementary and not competing with other circularity options (recycled content) nor as a replacement solution since it also aims to be recycled.
- Moreover, when recycled feedstock cannot be used because of safety regulations for Food Contact Materials or because packaging is compostable, exemptions should be granted or biomass-derived content should be allowed to be used by policy tools as an equivalent to the recycled content.
- Sustainability criteria should be considered to ensure the overall consistency of the packaging policy, provided that:
 - They are inspired from existing policy instruments defining such criteria (such as the Renewable Energy Directive), but are adapted to the specificities of packaging materials, and are aligned with the criteria that might be provided for in the forthcoming Policy Framework for biobased, biodegradable and compostable plastics;
 - Should there be a GHG reduction criterion, it should be based on proper accounting that fully considers the biogenic carbon uptake in biomass (contrary to the current PEF methodology) as suggested into the BioChem Europe position available [here](#).

² The Communication provides for an aspirational target of 20% non-fossil carbon in the chemicals and plastics industry by 2030.



BioChem Europe is a sector group of the European Chemical Industry Council (CEPIC) that envisions a future where:

- responsibly produced chemicals derived from sustainably sourced biomass respond to society's growing appetite for circular products that have limited or even positive impacts on the environment and climate
- the related need to increase and support the efficient utilization of biomass is recognized
- boosting research and innovation is seen as critical for these developments

The biomass-derived chemicals producers, members of BioChem Europe, intend to play their part and forge partnerships to achieve the European ambition to become climate-neutral by 2050.

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