Stakeholder Submissions on Oxo-Biodegradable Technology:

Responses to the EU SUPD Evaluation

March 2026

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Santa Rosa Plasticos
IMPORTADORES - REPRESENTANTES - DISTRIBUIDORES

Buenos Aires, 9 de Marzo 2026

To whom it may concern,

I am writing as a member of the Biodegradable Plastics Association (BPA) and as a representative of a company operating in Argentina, where plastic pollution in the open environment is a serious and growing problem.

In our country and throughout much of Latin America, waste management infrastructure is limited and often insufficient. Large volumes of plastic packaging and single-use plastic items escape collection systems and end up in streets, rivers, open dumps and natural environments. This situation makes it essential to adopt practical and realistic solutions that address plastic pollution under real-life conditions, not ideal ones.

Oxo-biodegradable plastic technology is vitally important in this context. We are actively working to raise awareness that the long-term solution to uncontrolled plastic pollution is to ensure that single-use plastics and packaging are made using d2w oxo-biodegradable technology, so that if they do escape into the environment, they will not persist for decades.

However, we frequently encounter resistance from customers, regulators and government officials who refer to the EU Single-Use Plastics Directive as justification for rejecting oxo-biodegradable technology. Although this Directive was developed for the European context, it is often cited outside the EU without consideration of local realities. This has created hesitation and confusion in our market, delaying or preventing the adoption of technologies that could significantly reduce environmental pollution.

As a result, the EU's current position on oxo-biodegradable plastics is directly contributing to the continued accumulation of plastic waste in the environment in countries such as ours. By discouraging the use of a proven technology, the Directive unintentionally allows environmental damage to increase in regions that lack effective waste management systems.

It is difficult to wnderstand how the EU can continue to oppose oxo-biodegradable technology when there is mounting scientific evidence demonstrating that it works, as clearly set out in the BPA's submission. The EU's current stance is not only scientifically incorrect, but also environmentally harmful when applied globally.

For these reasons, I fully support the BPA's recommendations that:

• The Single-Use Plastics Directive be corrected to recognise the clear distinction between oxo-degradable and oxo-biodegradable plastics.

• Article 5 and Article 3(3) be amended to accurately define and regulate oxo-biodegradable materials.

• The use of oxo-biodegradable technologies be permitted and encouraged, particularly in regions where their environmental benefits are most urgently needed.

I respectfully urge the EU to reconsider its position and to adopt a more science-based and globally responsible approach, taking into account the realities faced by countries outside Europe.

Yours faithfully,

Alejandro Dewald

Member- Biodegradable Plastics Association

Subject: Appeal for the Revision of the European Union Directive on Single-Use Plastics, with Emphasis on Oxo-Biodegradable Technology

Dear Sir/Madam,

As active members of the Biodegradable Plastics Association (BPA), we represent a network of professionals and companies dedicated to promoting innovative and sustainable solutions for plastic waste management. We are writing this letter to express our deep concern about the negative impacts of the current European Union Directive on Single-Use Plastics (Directive (EU) 2019/904) in global contexts, particularly in Brazil, where we operate.

In Brazil, oxo-biodegradable plastic technology plays a vital role in combating plastic pollution in open environments. Our country faces significant challenges, such as the lack of adequate infrastructure for waste collection and recycling in vast rural areas and urban peripheries, resulting in the accumulation of plastics in rivers, oceans, and soils. Issues like the clogging of drainage systems during heavy rains, contamination of marine ecosystems – directly affecting biodiversity and coastal fishing – and the persistence of plastic waste in overburdened landfills exacerbate the environmental crisis. These factors contribute to long-term pollution that threatens public health and ecological balance.

Our efforts focus on educating and raising awareness among society, clients, and authorities about the transformative potential of oxo-biodegradable plastics for manufacturing disposable items and packaging. This technology offers an effective solution, allowing plastics to degrade in a controlled manner in open environments, converting into environmentally harmless substances without leaving persistent microplastics. By adopting it, we can mitigate the damage caused by plastic pollution in a practical and accessible way, especially in regions where recycling systems are still insufficient.

However, we frequently observe that potential clients and government authorities hesitate to adopt these products, citing the EU Directive as a reference. This hesitation perpetuates the use

of conventional plastics, exacerbating the accumulation of waste in the Brazilian environment. Consequently, the European Union, by maintaining a restrictive stance, becomes indirectly responsible for the ongoing aggravation of this pollution in our country, as its regulatory influence extends globally through trade standards and international recommendations.

We question how the EU can persist in its opposition to this technology, in the face of a growing body of scientific evidence attesting to its effectiveness, as detailed in the submission presented by the BPA. Independent studies demonstrate that oxo-biodegradable plastics accelerate biodegradation without compromising functionality or safety, promoting a real reduction in the environmental persistence of waste. The EU's current position, by not adequately differentiating between obsolete oxo-degradable technologies and advanced oxo-biodegradable ones, proves not only scientifically inaccurate but also environmentally harmful, by obstructing innovations that could benefit global ecosystems.

We fully support the recommendations proposed by the BPA to correct these deficiencies in the Directive:

- Explicitly recognize the distinction between oxo-degradable and oxo-biodegradable plastics, ensuring that regulation is based on precise and updated scientific criteria.
- Amend Article 5 and Article 3(3) to define and regulate oxo-biodegradable materials accurately, eliminating ambiguities that inhibit their adoption.
- Allow and actively encourage the use of oxo-biodegradable technologies, considering their proven environmental benefits, such as the reduction of microplastics and compatibility with sustainable life cycles.

These changes would not only align the Directive with the latest scientific advances but also promote a more inclusive and effective approach to combating plastic pollution on a global scale. We are available to provide additional data, studies, or discussions that may support this review.

We await a positive and constructive response, confident that the EU will prioritize science and sustainability in its policies.

Sincerely,

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Plastic, printing and chemical distribution!

To: European Commission – Directorate-General for Environment

Subject: Response to Call for Evidence – Evaluation of Directive (EU) 2019/904 (SUP Directive) **Reference:** Ares (2025)11556597 – 23/12/2025

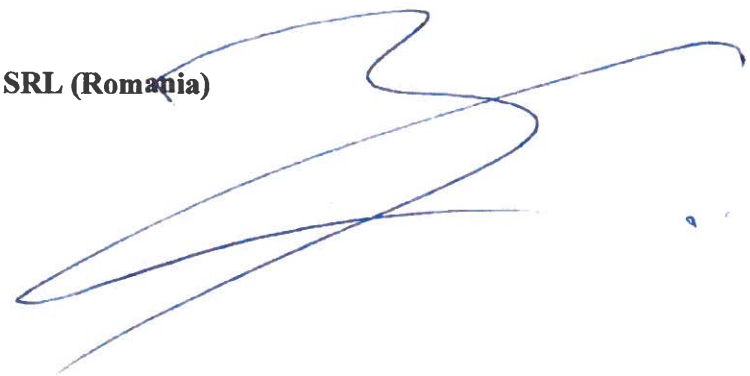
To whom it may concern,
As a member of the **BPA** and an active distributor in the Romanian polymer market, **Synthesia Grup SRL** is writing to highlight the negative impact that the current Single-Use Plastics Directive (SUPD) is having on environmental protection efforts in our country.
Romania faces significant challenges regarding plastic pollution and waste management infrastructure. A large volume of packaging material still ends up in the open environment, where it persists for decades. We have been working to educate the market that a viable answer to long-term pollution is to incorporate oxo-biodegradable technology into essential single-use plastics and packaging.
Unfortunately, we find that the EU's current stance in the SUPD is a major deterrent. When we propose these sustainable solutions, both private clients and public officials hesitate, quoting the EU ban. This regulatory confusion does not stop plastic use; it simply ensures that the plastic used remains a permanent pollutant. We contend that by maintaining this scientifically flawed ban, the EU is directly contributing to the mounting plastic waste problem in Romania.

Synthesia Grup SRL stands firmly with the BPA in requesting that:

- **A clear distinction** be made in the legislation between oxo-degradable (fragmenting) and oxo-biodegradable (biodegrading) plastics.
- **Articles 5 and 3(3) of the SUPD be amended** to provide a fair regulatory framework for materials that pass biodegradation standards such as ASTM D6954.
- **Policy-makers encourage the use of oxo-biodegradable additives** as a pragmatic solution for plastic waste that escapes the circular economy.

There is mounting scientific evidence that this technology works. We urge the European Commission to align its directives with scientific reality to prevent further environmental harm in our region.

Yours sincerely,
Name: Ventsislav Kostadinov
Managing Director **Synthesia Grup SRL (Romania)**



Eco II ***Manufacturing Inc.***

To: European Commission –
Directorate-General for Environment
Brussels,
Belgium

March 2026

Dear Sir,

Response to Call for Evidence – Evaluation of Directive (EU) 2019/904 (SUP Directive)Reference: Ares (2025)11556597.

We have read the Biodegradable Plastics Association's submission in response to your Call for Evidence.

Although your Directive has no legal force in Canada it is causing a serious problem for our environment.

We have for years been struggling with the problem of plastic waste which gets out into Canada's fields, forests, beaches, lakes and coastal waters. We cannot collect it all for recycling or anything else, and we need it to safely biodegrade without any human intervention.

We have tried various types of plastic, including the type marketed as "compostable" but this is not suitable, for the reasons given by the BPA at https://www.biodeg.org/subjects-of-interest/composting/ We have therefore concluded that the right type of plastic for us in Canada is called "oxo-biodegradable." We have examined very carefully all the evidence relating to it and we are satisfied that if it gets into our environment it will safely biodegradable and will not create microplastics or accumulate for decades. It is also not expensive and can be made by our local factories.

The problem is that the "compostable" plastic industry, and NGOs working with them, are trying to persuade people, including our legislators, that you have banned it for good reasons in the EU, and that it should not be used in Canada. However, on reading the BPA submission to you it is clear to us that if it has been banned in the EU this has not been done for good reasons.

We are therefore asking you to remove from Article 5 of the Directive any mention of "oxo-degradable" plastic.

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3391 McNicoll Avenue, Unit 6
Scarborough, Ontario M1V 2V4
Canada
Fax: (416) 292-5435

Eco II ***Manufacturing Inc.***

We support the Biodegradable Plastics Association's (BPA) recommendations that:

The Directive be corrected to recognise the distinction between oxo-degradable and oxo-biodegradable plastic

Amend Article 5 and Article 3(3) to accurately define and regulate oxo-biodegradable materials

Permit and encourage the use of oxo-biodegradable technologies, especially given their proven environmental benefits.

Thank you,

Mr. Stephen Klunowski
President
Eco II Manufacturing Inc.

enclosure

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Canada
Fax: (416) 292-5435

Date: Bogota, Feb 28 2026

To:
European Commission
Directorate-General for Environment

Subject: Impact of Directive (EU) 2019/904 on Environmental Solutions in Colombia

Dear Sir/Madam,

I write on behalf of Latin Pack SAS, a Colombian packaging company and member of the Biodegradable Plastics Association (BPA), to share our direct experience regarding the effects of Directive (EU) 2019/904 on markets outside the European Union, particularly in Latin America.

In Colombia, plastic pollution in the open environment is not a theoretical concern — it is a daily reality. Despite progress in environmental awareness, our country continues to face structural limitations in waste management. We do not yet have universal separation at source, our collection and sorting systems are uneven, and industrial composting infrastructure is very limited. As a result, a significant portion of plastic waste still escapes into rivers, rural areas, and natural ecosystems.

Under these conditions, technologies that mitigate the long-term persistence of plastics in the open environment are critically important. Oxo-biodegradable technology was developed precisely to address this gap: if plastic escapes collection systems, it is designed to degrade and subsequently biodegrade, rather than remain intact for decades and fragment into persistent microplastics.

Colombia has enacted legislation restricting certain single-use plastics. Importantly, our legal framework recognises additives that promote biodegradation in the natural environment as an acceptable environmental solution. In other words, our national policy is aligned with technologies that reduce long-term environmental accumulation.

However, in practice, the market response is heavily influenced by the European Single-Use Plastics Directive. Customers, retailers, and even government officials frequently cite the EU Directive when expressing hesitation toward oxo-biodegradable materials. The Directive's wording and subsequent interpretation have generated doubt, even where scientific evidence supports environmental benefit.

From our perspective, the European position appears to be driven more by political considerations than by a balanced scientific assessment. The scientific evidence referenced in the BPA submission, including independent testing and long-term studies, demonstrates that properly formulated oxo-biodegradable plastics biodegrade and do not create persistent microplastics. Yet the Directive does not clearly distinguish between oxo-degradable materials that merely fragment and oxo-biodegradable materials that are designed to complete the biodegradation process.

ISO 9001:2015
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The global influence of EU regulation is substantial. When ambiguity exists at that level, it is replicated internationally. In our region, this has three clear consequences:

First, environmental progress is slowed. Without broader adoption of oxo-biodegradable technology, conventional plastics continue to accumulate in open environments where collection is not feasible.

Second, compostable alternatives are often promoted as the preferred solution. In Colombia, however, compostable plastics do not function as intended because we lack sufficient composting infrastructure. Moreover, they can contaminate mechanical recycling streams. Several composting operators have expressed concern about operational disruptions caused by the growing presence of compostable plastics in mixed waste.

Third, there is a measurable economic impact. Companies that invest in technologies designed to mitigate environmental harm face reputational and commercial barriers created by regulatory ambiguity originating outside our jurisdiction. This discourages innovation and limits the adoption of solutions that could provide tangible environmental benefits.

For these reasons, we support the BPA's recommendation that the Directive be revised to clearly distinguish oxo-biodegradable materials from oxo-degradable plastics, and that Articles 5 and 3(3) be amended accordingly. Regulatory clarity based on scientific evidence would allow countries like ours to adopt complementary solutions without fear of contradicting European policy narratives.

Plastic pollution is a global issue. Decisions taken in the European Union have significant ripple effects in developing economies. We respectfully submit that maintaining a position that does not reflect the full body of scientific evidence risks contributing — unintentionally — to the continued accumulation of plastic waste in regions where environmental mitigation tools are urgently needed.

We remain available to provide further information regarding the practical realities we face in Colombia and Latin America.

Yours sincerely,

Sergio Mejía Estrada
CEO
Latin Pack SAS
Member, Biodegradable Plastics Association

ISO 9001:2015
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BUTIA

Dear Sir/Madam,

Our company, Butia Ltd, has been active in the plastics industry for decades and is widely recognized as one of the pioneers and creators of modern garbage bags used for household and industrial waste management. Through our long involvement in the sector, we have consistently invested in technologies that reduce environmental impact and improve the sustainability of plastic products.

In our region, plastic pollution in the open environment remains a significant challenge. Waste-management infrastructure is still developing, recycling systems are limited, and a considerable amount of plastic waste escapes into nature every year. Under such conditions, technologies that help prevent plastic from persisting in the environment for decades are vitally important.

Oxo-biodegradable technology provides a practical and scientifically supported solution to this problem. Products made with d2w oxo-biodegradable technology are designed so that, if they escape waste-management systems and enter the natural environment, they will degrade and subsequently biodegrade instead of remaining as persistent plastic waste. Scientific studies and independent laboratory testing demonstrate that oxo-biodegradable plastics can biodegrade effectively without leaving toxic residues or persistent microplastics.

Despite this evidence, the wording and interpretation of the Single-Use Plastics Directive (EU) 2019/904 have created widespread confusion by failing to distinguish clearly between **oxo-degradable plastics** and **oxo-biodegradable plastics**. In practice, this has discouraged the use of oxo-biodegradable technology not only within the European Union but also in many other parts of the world, where the Directive is frequently cited by customers and regulators as justification for rejecting this technology.

This situation is particularly problematic because conventional plastics continue to be used instead, materials that may remain in the environment for many decades and contribute to the growing problem of microplastics.

The contrast with other regions is striking. Our company supplies biodegradable plastic products to customers in the United States, including companies that actively promote their environmental responsibility and sustainability commitments. Many of these companies proudly use biodegradable technologies as part of their environmental policies and communicate this clearly to their customers. This demonstrates that outside the EU there is increasing recognition that biodegradable technologies can play an important role in reducing long-term plastic pollution.

It is therefore difficult to understand why the European Union continues to maintain a position that discourages the use of oxo-biodegradable technology when the scientific evidence supporting its effectiveness continues to grow. As explained in the submission made by the Biodegradable Plastics Association, independent studies including the Oxomar research program and testing by internationally recognized laboratories demonstrate that oxo-biodegradable plastics biodegrade and do not leave persistent microplastics in the environment.

The current EU position therefore risks being both scientifically incorrect and environmentally harmful, particularly for countries and regions where plastic waste management infrastructure is still developing. By discouraging the adoption of oxo-biodegradable technologies, the Directive inadvertently contributes to the continued accumulation of plastic waste in the open environment.

We support the recommendations made by the Biodegradable Plastics Association that the Directive be revised to:

- Recognise the scientific distinction between **oxo-degradable** and **oxo-biodegradable** plastics.
- Amend Article 5 and Article 3(3) to accurately define and regulate oxo-biodegradable materials.
- Permit and encourage the responsible use of oxo-biodegradable technologies, particularly for short-life plastic products which are most likely to escape into the open environment.

Such revisions would align European policy with the available scientific evidence and allow environmentally beneficial technologies to contribute meaningfully to the global effort to reduce plastic pollution.

We respectfully urge the European Commission to reconsider the current provisions of the Directive and ensure that future policy decisions are based on comprehensive scientific evaluation and environmental evidence.

Yours faithfully,

Thank you and Kind Regards

Marios Aristotelous
CEO Butia Enterprises ltd

BUTIA

MESA REOONDA DE LOS PAISES DE LA MANCOMUNIDAD EN LA REPUBLICA DOMINICANA

March 12th, 2026

European Commission - Directorate-General tor Environment
Response to Call for Evidence - Evaluation of Directive (EU) 2019/904 (SUP Directive)
Reference: Ares (2025)11556597 - 23/12/2025

Impact of the EU Single-Use Plastics Directive on the Dominican Republic.

Dear sirs:

I am writing to comment on the implications of the EU Single-Use Plastics Directive {Directive (EU) 2019/904) ("SUPD") ;snd Lhe effects it has had beyond the European Union, particula11y in the Dominican Republic. As the Dominican Republi<: is one of the countries that has incorporated Oxo-biodegradable standards into its nal.ionnl environmental policies, the consequences of the SUPD's approach to Oxo-degradable and Oxo-biodegradable plast.ics have been both significant and unintended.

The SUPD's blanket prohibition or what it ref-.,r.; tC> as •oxo-degradable plastics" has created substantial confusion internationally. The Directive makes no distinction between Oxo-degradable plastics, which merely fragment, and Oxo-biodegradable plastics-such as those manufactured in compliance with ASTM D6954•based national standards-designed to rully biodegrdde without leaving persistent micro plastics or toxic residues. The Dominican Republic is among the countries whose legislation, NORDOM-83, Is based on these internationally recognized testing standards. These standards were established to improve the environmental performance of conventional plastics in situations where litte.r escape cannot be fully prevented.

Since the publication of the SUPD and il:s ac omp<1nying Guidance, the Dominican Republic has experienced regulatory uncertainty and commercial disruption. Products that previously complied with NORDOM-83 and had been legally placed on the Dominican mar1<et-materials specifically formulated to reduce long-term plastic persistence-have been indirectly stigmatized or challenged by locar stak.,holders who incorrectly assume that the EU ban applies to all oxidative-biodegradation technologies. Ihis misunderstanding has discouraged the adoption of environmentally beneficial materlals and, in some cases, led to a reversion back to conventional plastics that do not biodegrade and t.herefore contribute to the long-term accumulation of waste in the local environment.

Moreover, the SUPD's approach has contributed to trade friction. Local manufacturers and importers who invested in Oxo-biodegradable technology in good faith—in alignment with their own national laws—have found themselves caught in a conflict between EU policy and domestic environmental strategy. This has created practical difficulties for compliance, enforcement, and procurement, while reducing incentives for innovation within the Dominican plastics sector.

The Dominican Republic, like many countries with developing waste-management infrastructure, faces considerable challenges in collecting all single-use plastics, particularly in coastal regions and rural communities. Technologies that accelerate the degradation process and enable subsequent biodegradation play an important role in reducing the persistence of plastic pollution in such environments. National standards such as NORDOM-83 were introduced precisely because the country recognized the need for environmentally safer alternatives to conventional plastics. The unintended consequence of the SUPD has been to undermine these efforts.

Given these cross-border impacts, it is essential that the SUPD evaluation process now underway takes into account the international ramifications of EU regulatory decisions—especially where they conflict with scientific evidence or established national standards in non-EU countries. The Dominican Republic and others have based their legislation on scientific testing confirming the biodegradability and non-toxicity of these materials, supported by international research including the Oxo mar study and independent assessments conducted by laboratories such as Intertek.

For these reasons, we respectfully submit that the EU should:

- clearly distinguish between Oxo-degradable and Oxo-biodegradable plastics, aligning definitions with those published by CEN and supported by scientific evidence;
- reassess the scope of Article 5 to ensure it does not inadvertently prohibit materials that biodegrade fully and do not contribute to micro plastic formation;
- recognize that policies developed for the EU's waste-management context may have unintended adverse consequences for partner countries with different environmental challenges.

We would welcome the opportunity to provide further scientific documentation or participate in discussions regarding the international effects of the SUPD.

Thank you for your attention to this matter, sincerely yours.

MESA REDONDA PAISES MANCOMUNIDAD
República Dominicana

Fernando Gonzalez Nicolas
Presidente

Edificio NP1 * Calle Frank Felix Miranda # 38 * Ensanche Naco * Santo Domingo, República Dominicana *
Tel. 809-338-0808, Email: info@commonwealthdr.org.do

PRANAVI
GREEN EARTH

March 9th, 2026

The Director General of DG Environment
EU Commission
Brussels,
Belgium

Dear Sir,

Subject: Your Reference: Ares (2025)11556597 – 23/12/2025

We are members of the Biodegradable Plastics Association, and we have read their evidence to your review of the Single-use Plastics Directive 2019/904. We agree with the representation made by BPA and evidence submitted by them.

The problem of plastic waste getting into the environment is a global issue and it also effects India in a big way due to the large population size. India is trying to improve the plastic waste management system but we face added challenges when references are taken from the responsible economies like European Union, where it does not match the reality.

In India, we need plastics which will not persist in the environment for decades but will biodegrade without leaving microplastics or toxic residues. We have been experimenting with a type of plastic marketed as "compostable", but we have found that it is not suitable for the following reasons:

To take this plastic to a composting facility it must be collected, but the problem is that the segregation and collection infrastructure is not in place. In addition to it:

- We do not have industrial composting facilities in India
- The operators don't want plastic of any kind, because plastic gets tangled up with their machinery, and they can't anyway tell what is compostable and what is not.
- The plastic does not convert into compost – it converts into CO_2 gas.
- It cannot be recycled if collected
- It is not as strong and versatile as ordinary plastic
- It is too expensive for us in India.

D-87, BIZCOSPACES, 8th Floor, Infra Futura Building, Opp Bharata Mata College,
Seaport Airport Road,Kakkanad, Kerala-682021

PRANAVI
GREEN EARTH

So, we have had to look for a different type of biodegradable plastic, and we have found that oxo-biodegradable or biodegradable plastic plastic is exactly what we need, because:

- It performs in the same way as ordinary plastic, but if it does not get collected it will automatically convert into biodegradable materials and will not leave microplastics or toxic residues in the environment. It is important to note that it does not just break up into small pieces as some people think.
- It is not intended for composting facilities
- If collected it can be recycled with ordinary plastic
- It is not expensive and can be made by local factories with their existing machinery and workforce.

The problem we have is that people in India tend to believe that the EU gets its environmental policies right and they therefore tend to follow your SUP Directive, which many people think imposes a ban on oxo-biodegradable plastic as well as oxo-degradable plastic.

However, for the reasons explained very well in the BPA evidence, Article 5 was a mistake, but it is still making it difficult for us to persuade people, with the result that thousands of tons of ordinary plastic continue to get into our environment, where it will accumulate for decades. It will also create microplastics which will get into our food and water and even into the air we breathe.

We are therefore asking you to remove all reference to "oxo-degradable" plastic from your Directive.

Yours sincerely,

PRANAVI GREEN EARTH

Pratibha Vijay Shanker

CEO, Pranavi Green Earth

Email : pratibha@pranavigreenearth.com Mob: +91 – 9744304900

BOTHRA BROS A DIVISION OF AURA TELEVENTURES LLP GST NO 27AAWFA7765Q2Z6

Mob NO : 9799774000

MAIL ID : bothrabross@gmail.com

March 9th, 2026

The Director General of DG Environment
EU Commission
Brussels,
Belgium

Dear Sir,

Subject: Your Reference: Ares (2025)11556597 – 23/12/2025

We are members of the Biodegradable Plastics Association, and we have read their evidence to your review of the Single-use Plastics Directive 2019/904. We agree with the representation made by BPA and evidence submitted by them.

The problem of plastic waste getting into the environment is a global issue and it also effects India in a big way due to the large population size. India is trying to improve the plastic waste management system but we face added challenges when references are taken from the responsible economies like European Union, where it does not match the reality.

In India, we need plastics which will not persist in the environment for decades but will biodegrade without leaving microplastics or toxic residues. We have been experimenting with a type of plastic marketed as "compostable", but we have found that it is not suitable for the following reasons:

To take this plastic to a composting facility it must be collected, but the problem is that the segregation and collection infrastructure is not in place. In addition to it:

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- It cannot be recycled if collected
- It is not as strong and versatile as ordinary plastic
- It is too expensive for us in India.

Registered Address : Near Dindoshi Police Station, Vinayak Height, Bunglow No. 3, Upper Goving Nagar Kailashpuri , Mumbai Maharashtra – 400097

Godown Address : Inside Jai Shree Ram Compound, Godown No 5 to 13, Krishna Complex Building No F6, North Light Gala No 5 to 13, Bhiwandi Thane Maharashtra - 421302

BOTHRA BROS A DIVISION OF AURA TELEVENTURES LLP GST NO 27AAWFA7765Q2Z6

Mob NO : 9799774000

MAIL ID : bothrabross@gmail.com

So, we have had to look for a different type of biodegradable plastic, and we have found that oxo-biodegradable or biodegradable plastic plastic is exactly what we need, because:

- It performs in the same way as ordinary plastic, but if it does not get collected it will automatically convert into biodegradable materials and will not leave microplastics or toxic residues in the environment. It is important to note that it does not just break up into small pieces as some people think.
- It is not intended for composting facilities
- If collected it can be recycled with ordinary plastic
- It is not expensive and can be made by local factories with their existing machinery and workforce.

The problem we have is that people in India tend to believe that the EU gets its environmental policies right and they therefore tend to follow your SUP Directive, which many people think imposes a ban on oxo-biodegradable plastic as well as oxo-degradable plastic.

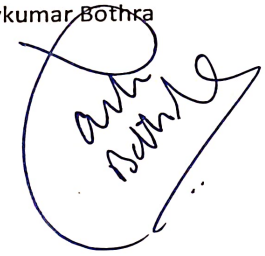
However, for the reasons explained very well in the BPA evidence, Article 5 was a mistake, but it is still making it difficult for us to persuade people, with the result that thousands of tons of ordinary plastic continue to get into our environment, where it will accumulate for decades. It will also create microplastics which will get into our food and water and even into the air we breathe.

We are therefore asking you to remove all reference to "oxo-degradable" plastic from your Directive.

Yours sincerely,

Yash Jaykumar Bothra

Partner



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Godown Address : Inside Jai Shree Ram Compound, Godown No 5 to 13, Krishna Complex Building No F6, North Light Gala No 5 to 13, Bhiwandi Thane Maharashtra - 421302

PLASTO FILMS
Manufacturers of : Zipper Pouch & Slider Bags, Shrink Film, HM, LD, PP, Tube & Printed Bags

March 9th, 2026

The Director General of DG Environment
EU Commission
Brussels,
Belgium

Dear Sir,

Subject: Your Reference: Ares (2025)11556597 – 23/12/2025

As stakeholders working closely with biodegradable plastics in real-world conditions, we have carefully reviewed the evidence submitted by the Biodegradable Plastics Association to your review of the Single-use Plastics Directive 2019/904, and we agree with the representations and evidence presented.

The problem of plastic waste getting into the environment is a global issue and it also effects India in a big way due to the large population size. India is trying to improve the plastic waste management system, but we face added challenges when references are taken from the responsible economies like European Union, where it does not match the reality.

In India, we need plastics which will not persist in the environment for decades but will biodegrade without leaving microplastics or toxic residues. We have been experimenting with a type of plastic marketed as "compostable", but we have found that it is not suitable for the following reasons:

To take this plastic to a composting facility it must be collected, segregated, and sent to specialised composting facilities; but the problem is that the segregation and collection infrastructure is not in place in India. In addition to it:

- We do not have enough industrial composting facilities in India.
- The operators don't want plastic of any kind, because plastic gets tangled up with their machinery, and they can't anyway tell what is compostable and what is not.
- The plastic does not convert into compost – it converts into CO_2 gas and is energy intensive as it needs specific temperature-controlled environment.
- It cannot be recycled if collected and if contaminated, it will pollute the entire recycling stream.
- Its generally not proven food safe in most packaging and manufacturing conditions.

124, DSIDC Shed, Okhla Industrial Area, Phase-I, New Delhi - 110 020 : 011-41611019
: plasto.films@gmail.com : www.plastofilms.com

- It is not as strong and versatile as ordinary plastic and has limited application in specialised industries like safety equipment which need proper packaging during transit.
- It is too expensive for us in India and puts immense strain on industry as whole.

So, we have had to look for a different type of biodegradable plastic, and we have found that oxo-biodegradable or biodegradable plastic is exactly what we need, because:

- It performs in the same way as ordinary plastic, but if it does not get collected it will automatically convert into biodegradable materials and will not leave microplastics or toxic residues in the environment. It is important to note that it does not just break up into small pieces as some people think.
- It is not intended for composting facilities.
- If collected it can be recycled with ordinary plastic
- It is not expensive and can be made by local factories with their existing machinery and workforce.

The problem we have is that people in India tend to believe that the EU gets its environmental policies right and they therefore tend to follow your SUP Directive, which many people think imposes a ban on oxo-biodegradable plastic as well as oxo-degradable plastic.

However, for the reasons explained in the BPA evidence, Article 5 was not formulated based on complete or accurate assumptions, and it continues to create significant challenges in persuading stakeholders, with the result that thousands of tons of ordinary plastic continue to get into our environment, where it will accumulate for decades. It will also create microplastics which will get into our food and water and even into the air we breathe.

We therefore urge the Commission to remove all references to "oxo-degradable" plastic from the Directive.

Yours sincerely,

Rishab Tandon

Vice President, Plasto Films

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STAR CHEM

Address: NCR/AC/PS/01/028, Ground Floor and First Floor, Worldmark 1, Asset Area 11, Delhi Aerocity, New Delhi – 110037 India
Email: rajeevbhardwaj2021@outlook.com; rajeevbhardwaj_hpl@yahoo.co.in
Mobile No.: +91-9958032828

March 9th, 2026

The Director General of DG Environment
EU Commission
Brussels,
Belgium

Dear Sir,

Subject: Your Reference: Ares (2025)11556597 – 23/12/2025

We are members of the Biodegradable Plastics Association, and we have read their evidence to your review of the Single-use Plastics Directive 2019/904. We agree with the representation made by BPA and evidence submitted by them.

The problem of plastic waste getting into the environment is a global issue and it also effects India in a big way due to the large population size. India is trying to improve the plastic waste management system but we face added challenges when references are taken from the responsible economies like European Union, where it does not match the reality.

In India, we need plastics which will not persist in the environment for decades but will biodegrade without leaving microplastics or toxic residues. We have been experimenting with a type of plastic marketed as "compostable", but we have found that it is not suitable for the following reasons:

To take this plastic to a composting facility it must be collected, but the problem is that the segregation and collection infrastructure is not in place. In addition to it:

- We do not have industrial composting facilities in India
- The operators don't want plastic of any kind, because plastic gets tangled up with their machinery, and they can't anyway tell what is compostable and what is not.
- The plastic does not convert into compost – it converts into CO_2 gas.
- It cannot be recycled if collected
- It is not as strong and versatile as ordinary plastic
- It is too expensive for us in India.

So, we have had to look for a different type of biodegradable plastic, and we have found that oxo-biodegradable or biodegradable plastic plastic is exactly what we need, because:

- It performs in the same way as ordinary plastic, but if it does not get collected it will automatically convert into biodegradable materials and will not leave microplastics or toxic residues in the environment. It is important to note that it does not just break up into small pieces as some people think.
- It is not intended for composting facilities
- If collected it can be recycled with ordinary plastic
- It is not expensive and can be made by local factories with their existing machinery and workforce.

The problem we have is that people in India tend to believe that the EU gets its environmental policies right and they therefore tend to follow your SUP Directive, which many people think imposes a ban on oxo-biodegradable plastic as well as oxo-degradable plastic.
However, for the reasons explained very well in the BPA evidence, Article 5 was a mistake, but it is still making it difficult for us to persuade people, with the result that thousands of tons of ordinary plastic continue to get into our environment, where it will accumulate for decades. It will also create microplastics which will get into our food and water and even into the air we breathe.
We are therefore asking you to remove all reference to "oxo-degradable" plastic from your Directive.

Yours sincerely,

STAR CHEM
Worldmark-1
Asset Area 11
Delhi Aerocity
NEW DELHI-110037

NAME: Rajeev Bhardwaj
Designation: Proprietor and Manager
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and First Floor, Worldmark 1, Asset Area 11,
Delhi Aerocity, New Delhi – 110037 India

LUIBEG ENVIRONMENTAL TECHNOLOGIES (INDIA) PRIVATE LIMITED

CIN: U74999WB2011PTC158942 **GST: 19AABCL9632M2ZX**
PAN: AABCL9632M **I E CODE: 0211022675**

16th March, 2026.

Dear Sirs,

I refer to your forthcoming review of the Single Use Plastics Directive.

My Company Luibeg Environmental Technologies (India) Pvt. Ltd., registered in India, is a Member of Biodegradable Plastics Association in London. We have been actively developing and promoting the biodegradable technology in India for over 20 years.

India is a country where there are major issues with plastic pollution and the use of this technology is critical for protection of the environment.

It is our belief that the only positive and cost effective solution to the ongoing issues over discarded plastics, is to make all single use plastics and packaging oxo-biodegradable. To this end, we have spent considerable time over many years working with manufacturers, brand owners and the various government departments, convincing them that this is the safest and most effective route to follow.

In many instances, we are inhibited by the fact these parties flag up the EU Plastics Directive as the reason for their reluctance to use the technology. Their hesitancy then exacerbates the pollution problems in a country where waste management and disposal are still minimal.

As a result, the continuing plastic pollution problems in India, directly relate to the EU Directive.

We cannot understand why the EU continues to ignore the extensive scientific evidence which clearly shows that the technology works, as explained in the BPA submission. The extensive research and testing provides clear evidence that the EU`s current position is scientifically incorrect and this stance is impacting on plastic pollution around the world and very badly in India.

My Company totally supports the BPAs recommendations that:

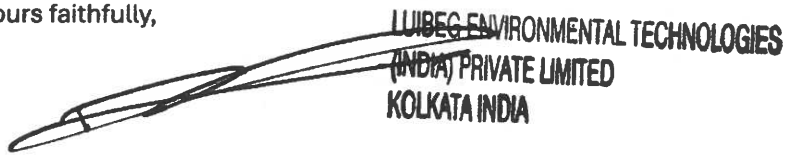
The Directive be corrected to recognise the distinction between oxo-degradable and oxo-biodegradable plastic

Amend Article 5 and Article 3(3) to accurately define and regulate oxo-biodegradable materials

Permit and encourage the use of oxo-biodegradable technologies, especially given their proven environmental benefits.

Thanking you.

Yours faithfully,



R. Keith Mackay

DIRECTOR

LUIBEG ENVIRONMENTAL TECHNOLOGIES (INDIA) PVT. LTD

Symphony Environmental India Pvt Ltd
Plot 5 | Sector C 6&7 | LSC | Vasant Kunj | New Delhi | 110070
+91 9911396237 | sunil.panwar@d2w.net

The Director General of DG Environment
EU Commission
Brussels,
Belgium

March 09, 2026

Your Reference: Ares (2025)11556597 – 23/12/2025

Dear Sir,

We are members of the Biodegradable Plastics Association, and we have read their evidence to your review of the Single-use Plastics Directive 2019/904. We agree with every word they say.

As you probably know, the problem of plastic waste getting into the environment is even worse in India than it is in Europe. India is trying to improve its waste management system, but we have no alternative but to accept that this problem will continue for the foreseeable future.

We therefore need plastic which will not persist in the environment for decades but will instead biodegrade without leaving microplastics or toxic residues. We have been experimenting with a type of plastic marketed as "compostable", but we have found that it is not suitable for the following reasons:

In order to take this plastic to a composting facility it must be collected, but the problem is that we cannot collect it. In any event:

- We do not have many industrial composting facilities in India
- The operators don't want plastic of any kind, because plastic gets tangled up with their machinery, and they can't anyway tell what is compostable and what is not.
- The plastic does not convert into compost – it converts into CO_2 gas.
- It cannot be recycled if collected
- It is not as strong and versatile as ordinary plastic
- It is too expensive for us in India.

So, we have had to look for a different type of biodegradable plastic, and we have found that oxo-biodegradable plastic is exactly what we need, because:

- It performs in the same way as ordinary plastic, but if it does not get collected it will automatically convert into biodegradable materials and will not leave microplastics or toxic residues in the environment. It is important to note that it des not just break up into small pieces as some people think.
- It is not intended for composting facilities

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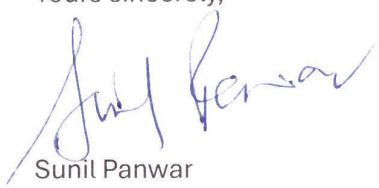
- If collected it can be recycled with ordinary plastic
- It is not expensive, and can be made by local factories with their existing machinery and workforce.

The problem we have is that people in India tend to believe that the EU gets its environmental policies right and they therefore tend to follow your SUP Directive, which many people think imposes a ban on oxo-biodegradable plastic as well as oxo-degradable plastic.

However, for the reasons explained very well in the BPA evidence, Article 5 was a mistake, but it is still making it difficult for us to persuade people, with the result that thousands of tons of ordinary plastic continue to get into our environment, where it will accumulate for decades. It will also create microplastics which will get into our food and water and even into the air we breathe.

We are therefore asking you to remove all reference to "oxo-degradable" plastic from your Directive.

Yours sincerely,



Sunil Panwar

C.E.O

Mobile : +91- 99113 96237

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Making Plastic Smarter
EKO & CLEAN
Eli Amir
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Mobile +972 50 3039426
www.ekopico.com

Subject: Impact of the Single-Use Plastics Directive (SUPD) on Environmental Management in Israel

To: European Commission – Directorate-General for Environment

Dear Sir or Madam,

I am writing as a member of the **Biodegradable Plastics Association (BPA)** to comment on the impact that the EU Single-Use Plastics Directive (SUPD) is having beyond the European Union, particularly in countries such as Israel.

In Israel, plastic pollution in the open environment is a serious and visible problem. Israel faces ongoing challenges with plastic litter in public areas, beaches, and open landscapes. Waste-management infrastructure is improving, but it is still not sufficient to prevent large quantities of plastic waste from escaping into the environment. As a result, plastic materials can remain in the natural environment for decades, gradually fragmenting and contributing to long-term pollution.

For this reason, technologies that enable plastic products to biodegrade if they escape into the open environment are vitally important in our country. While reduction, reuse, and recycling are essential parts of environmental policy, they are clearly not enough on their own. A significant proportion of plastic waste still escapes collection systems and becomes long-term pollution. According to scientific evidence cited by the Biodegradable Plastics Association, plastics designed to degrade and subsequently biodegrade in the open environment can help address this gap by preventing the accumulation of persistent plastic fragments and microplastics.

In Israel we are actively working to raise awareness among businesses, consumers, and policymakers that the long-term solution to plastic pollution must include improved materials for single-use plastics and packaging. However, many customers and government officials hesitate to adopt such technologies because they refer to the EU Single-Use Plastics Directive, which they understand to prohibit certain degradable plastics. This has created confusion and has discouraged the use of technologies that could help reduce long-term environmental pollution.

The consequence is that conventional plastics continue to be used in many applications. These materials can persist in the environment for decades and contribute to the growing accumulation of plastic waste in soils, waterways, and marine environments. In this sense, the current interpretation of the EU Directive has an unintended effect in countries outside the EU by discouraging the adoption of technologies designed to reduce environmental persistence of plastic materials.

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We therefore believe that the EU has an important responsibility to reconsider its current position. There is now a growing body of scientific evidence demonstrating that certain technologies allow plastics to degrade and biodegrade without leaving harmful residues or persistent microplastics, as outlined in the BPA submission to the Commission. The current regulatory approach therefore risks being both scientifically inaccurate and environmentally counterproductive.

For these reasons we strongly support the recommendations made by the Biodegradable Plastics Association that:

- The Directive should clearly recognize the **distinction between oxo-degradable and oxo-biodegradable plastics**.
- **Article 5 and Article 3(3)** should be amended to accurately define and regulate oxo-biodegradable materials.
- The use of **oxo-biodegradable technologies should be permitted and encouraged**, particularly where they provide proven environmental benefits in preventing long-term plastic pollution.

Plastic pollution is a global problem, and policies adopted in Europe influence environmental practices in many other countries. It is therefore essential that regulatory frameworks reflect the best available science and support solutions that genuinely reduce environmental harm.

We ask the European Commission to consider these points carefully during its evaluation of the Single-Use Plastics Directive.

Yours faithfully,

Mr. Eli Amir

El Amir 514537752 LTD

CEO

Member, Biodegradable Plastics Association (BPA)

Israel

cpsTechnology
Creative Polymer Solution Technology

Address: A-511 The-sharp-starpark BLDG., 10, Olympic-ro 35ga-gil, Songpa-gu, Seoul, Republic of Korea, 05510

To: The Director-General
DG Environment
EU Commission
Brussels

March 2026

Dear Sir,

We are members of the Biodegradable Plastics Association, and we have read and agree with their submission to your consultation on the revision of the Single-use Plastics Directive 2019/904.

We have been making really significant and intensive efforts on providing packaging film convertors (more than 100 companies) in South Korea with technical seminars and technical assistances for conducting validation testings based ASTM D 6954 and production with oxo-biodegradable masterbatch for its packaging films and containers.

We have full confidence on scientific evidences and mechanism of oxo-biodegradable masterbatch and feedbacks from our partnering customers who have conducted actual validation testings with oxo-biodegradable masterbatch added film.

Please note have been facing very challenging barriers due to the Single-Use Plastics Directive. Packaging convertors and end users (brand owners) in South Korea are confused and misunderstood due to the single-Use Plastics Directive as they are confused between oxodegradable plastics and oxobiodegradable plastics.

And PLA based biodegradable plastics manufacturers eg; BASF, SK Chemical did use it for promoting its PLA based biodegradable plastics and turning people away from oxo-biodegradable plastic. And packaging convertors and container convertors that are using PLA based biodegradable plastics have been fully utilizing the EU Directive for promoting their PLA based biodegradable packaging film and containers.

The government in South Korea have provided PLA based bioplastics manufacturers and PLA based bioplastics film convertors in South Korea with incentives for the past 30 years however the government in South Korea began recognizing that the policy is not workable so the government does not provide them with incentive any more.

There are few facilities that can have proper conditions for PLA based biodegradable plastics packaging films and containers in South Korea. So, PLA based biodegradable plastics packaging films and containers are collected yet they are not put into compost. All of PLA based biodegradable plastics packaging films and containers are incinerated in South Korea. The government in South Korea know this very well.

Collection of single use plastics packaging films and containers for recycling is not workable in South Korea. Although South Korea has system for collecting single use plastics packaging films and containers, it is not enough to improve plastics litters, especially in the mountains and oceans. People in South Korea already know this issues very well. Major TV have broadcasted this issue so people in South Korea are awaring it very well.

We, really hope that EU recognizes the issues with plastics litters and micro plastics in the oceans in South Korea and other countries eg; China, Vietnam, Indonesia, Thailand, Malaysia, Miyanma, India, Bangladesh. Collecting single use plastics in South Korea is much better than China and other countries in Asia region, but it is still not enough.

We need to make our plastic oxo-biodegradable so that it will not accumulate in our environment and your SUP Directive is causing a big problem here. Perhaps you don't care about this in Europe but we really care about it here in Asia.

South Korea has 235 man-made "mountains", created by massive piles of discarded waste—primarily plastic. More than 3.5 million people in South Korea have watched this shocking story https://youtube.com/watch?v=fHJ-Nc2X758 . I was really shocked after watching it.

Please take urgent notice of the BPA submission to your consultation and stop your attack on this essential technology.

With kind regards,

Joseph Lee

CEO

Bielsko-Biała, 11.03.2026

To: European Commission
Directorate General for Environment

Position of Fundacja Noweko

Contribution to the Evaluation of Directive (EU) 2019/904 (Single-Use Plastics Directive)

Fundacja Noweko, acting in accordance with its statutory objectives related to environmental protection, ecological education, support for sustainable waste management solutions, and promotion of practical measures limiting environmental pollution, presents the following position in relation to the ongoing evaluation of Directive (EU) 2019/904.

The Foundation supports a re-evaluation of the provisions of the Directive that currently restrict the use of oxo-biodegradable additive technologies where their performance can be scientifically demonstrated under recognised international standards.

In the Foundation's view, the present wording of the Directive does not sufficiently distinguish between materials that merely fragment under oxidation and materials designed to undergo oxidative degradation followed by biodegradation under environmental conditions, without generating persistent microplastic residues.

Scientific studies and testing methodologies referenced internationally indicate that properly formulated oxo-biodegradable plastics may offer an important transitional environmental function, particularly in Member States where waste collection, segregation and landfill systems are still developing and where leakage of plastic waste into the environment remains a practical challenge.

This issue remains relevant in Poland, where despite significant progress in municipal waste management, landfill burden, insufficient separation of mixed waste streams, and operational limitations in waste handling continue to generate environmental and social costs.

In practical conditions observed in Poland:

- lightweight plastic waste bags frequently rupture during collection, transport and landfill operations,

- exposed waste contributes to local odour nuisance affecting nearby communities,
- accidental release of waste fractions increases environmental burden around storage and disposal areas.

In such circumstances, allowing certified oxo-biodegradable technologies as an optional transitional solution may reduce long-term persistence of escaped plastic fractions while supporting broader environmental objectives.

The Foundation emphasises that such technologies should not be treated as an alternative to recycling policy, but rather as a complementary solution applicable during the transition period in Member States where full waste-system efficiency has not yet been achieved.

For this reason, Fundacja Noweko supports consideration of amendments that would restore the possibility of using certified oxo-biodegradable additive systems under clearly defined technical conditions, including:

- compliance with recognised biodegradation standards such as ASTM D6954,
- confirmation of absence of toxic residues,
- confirmation that no persistent microplastic accumulation occurs.

The Foundation therefore supports repeal or revision of those provisions of Directive (EU) 2019/904 that currently create a blanket restriction preventing the use of scientifically verified oxo-biodegradable additive technologies.

A differentiated regulatory approach would better reflect the diverse waste-management realities across the European Union and allow Member States to apply environmentally justified transitional measures where appropriate.

Magdalena Góralczyk

President of the Board

Fundacja Noweko

Pure Polymers
Real Passion for Quality

The Director-General,
DG Environment
EU Commission
Brussels

March 2026

Dear Sir,

We have read the SUBMISSION FROM THE BIODEGRADABLE PLASTICS ASSOCIATION
In response to your Call for Evidence – Evaluation of Directive (EU) 2019/904 (SUP Directive) Reference: Ares (2025)11556597 – 23/12/2025.

We agree with the BPA Submission.

Pure Polymers is a manufacturer of masterbatches for the plastics industry and is a leading member of the plastics industry in Saudi Arabia.

Our government passed a law in 2016 to make it compulsory to use oxo-biodegradable technology for a wide range of plastics products. They did this, after an expert evaluation of the technology, because they recognise the value of plastic products for our people and did not wish to ban them.

They were however aware that, despite their best efforts to improve waste management, a significant amount of single-use plastic products do get out into the open environment in our country. They therefore decided that they must be made oxo-biodegradable so that they will safely biodegrade without creating microplastics will not persist in the environment, but can still be recycled if collected.

In the nine years since this law was passed it has made an important contribution to the protection of our environment and we have experienced no difficulties at all with it. We do not understand why you had taken the opposite view in the EU, and that you are still therefore allowing pollution of the environment by ordinary plastic. Damage to the environment affects us all, wherever we are in the world. Article 5 of your SUP Directive has also made it very difficult for us to export the pro-degradant masterbatches which we produce.

Having read the BPA submission we do not think that Article 5 was properly considered by the EU legislators, and we would ask that you remove the reference to “oxo-degradable” plastic.

Yours sincerely,

شركة اللدائن النقية للصناعة (مساهمة مقفلة) - المدينة الصناعية الثالثة بجدة - المملكة العربية السعودية - 00966546460891

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Ferrarska 14, SI-6000 Koper
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W:www.gojakagenzia.com

Koper, March 6th, 2026

Subject: Support for BPA Submission – Evaluation of Directive (EU) 2019/904

To whom it may concern,

Our company, based in Slovenia, is a member of the Biodegradable Plastics Association (BPA). We welcome the opportunity to express our support for the BPA submission in the context of the European Commission's evaluation of Directive (EU) 2019/904 on single-use plastics.

Plastic leakage into the environment remains a challenge in many parts of Europe, including Slovenia and the wider Adriatic region. While recycling and improved waste-management systems are essential, they cannot fully prevent plastic from escaping into the open environment.

In this context, technologies designed to reduce the long-term persistence of plastic in nature should be carefully assessed. Oxo-biodegradable technology may represent a complementary approach by enabling certain plastic products to degrade and subsequently biodegrade more rapidly if they escape waste-management systems.

We note that the current framework of the Directive does not clearly distinguish between oxo-degradable and oxo-biodegradable plastics. This lack of differentiation has created uncertainty for businesses and stakeholders.

We therefore support the BPA recommendation that the Directive be reviewed and clarified, including the provisions in Article 5 and Article 3(3), in order to ensure that regulatory decisions reflect scientific evidence and properly recognise the distinction between different technologies.

We appreciate the Commission's ongoing evaluation of the Directive and the opportunity to contribute to this process.

Yours sincerely,

Mirjana Gojak
Director
Gojak Agenzia d.o.o.
Slovenia

SYCRO ENVIRONMENTAL

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South Africa.
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16 March 2026

DG Environment
EU Commission
Brussels

Dear Sir,

SUP DIRECTIVE (Ares (2025)11556597 – 23/12/2025)

We have a big problem in South Africa, and your SUP Directive is making matters worse.

We simply cannot collect all the used plastic, and far too much of it gets into the open environment as litter where it will accumulate for decades.

Compostable plastic is not the answer, for a whole lot of reasons, but we have come to the conclusion that oxo-biodegradable plastic would be very helpful. We have studied this technology carefully, and we are quite sure that instead of persisting in the environment it will safely biodegrade leaving no microplastics or toxic residues.

We really need this technology in Africa, but people are used to following the EU, and they think that your SUP Directive has banned it, even though the Directive has no legal force in our country.

We have read the response of the Biodegradable Plastics Association to your call for evidence, and for the reasons which they explain we are asking you to delete Article 5, or at least that part of it which refers to "oxo-degradable" plastic.

Yours sincerely

MIKE BUTZ
Director

13 March 2026

European Commission
Directorate-General for Environment
Avenue d'Auderghem 19
1040 Brussels, Belgium

Symphony Environmental Technologies Plc
6 Elstree Gate, Elstree Way
Borehamwood
Hertfordshire WD6 1JD
England

+44 (0)20 8207 5900 Telephone
www.symphonyenvironmental.com
michael.laurier@d2w.net

Dear Sir/Madam

Subject: Impact of Directive (EU) 2019/904 on Environmental Solutions and Global Markets – Symphony Environmental Technologies Plc

I write on behalf of Symphony Environmental Technologies Plc, a UK–based manufacturer of plastic masterbatch technologies. Symphony is a public company quoted on the London Stock Exchange, and has operated for over 35 years. It is accredited to ISO 14001 and 9001 and is internationally recognised as the leader in oxo-biodegradable plastic technology.

Our technology was developed in close collaboration with Professor Gerald Scott, Professor of Chemistry at Aston University, and inventor of oxo-biodegradable plastics; and continues to be supported by ongoing research with universities and independent laboratories worldwide. Symphony is a leading member of the Biodegradable Plastics Association, and we agree entirely with the BPA submission to your call-for-evidence.

We are writing to share our experience of the practical and unintended consequences of Article 5 of the Single-Use Directive (EU) 2019/904 on environmental outcomes in the United Kingdom and, critically, on other markets outside the European Union.

1. Market exclusion and global regulatory signalling

Art. 5 bans oxo-degradable plastic, but is widely and mistakenly thought to apply to oxo-biodegradable plastics as well, thus excluding oxo-biodegradable plastics from the European market, and from other countries where waste collection, recycling, and industrial composting infrastructure is insufficient or does not exist at all.

Despite the fact that oxo-biodegradable technology has been proven to work, and is not actually banned by the SUP Directive, there are still many systemic barriers to using it worldwide, because:

- Multinational brand owners and converters align global material choices to EU regulatory positions;
- Export-oriented manufacturers are reluctant to adopt materials perceived as non-compliant with EU policy;

- Policymakers in non-EU countries routinely cite the SUPD as justification for rejecting oxo-biodegradable plastic, (confusing it with oxo-degradable plastic, which *is* banned) even where no domestic assessment has been undertaken.

2. Structural assumptions within the SUPD

The SUPD is explicitly built around a circular economy model, which assumes:

- Effective waste collection
- Functioning recycling systems or industrial composting
- Managed end-of-life pathways

This is problematic for countries — including many in Africa, Asia, and Latin America — where large amounts of plastic leak into the environment precisely because the ability to collect all the waste plastic for processing does not exist.

Plastics which are marketed as "compostable" and are promoted under current policy narratives, also fail in the absence of controlled collection and industrial composting facilities. The Directive, however, provides no policy space for complementary solutions designed to mitigate environmental harm when waste inevitably escapes from a circular economy.

This creates a regulatory paradox:

The EU bans a technology designed to address plastic in the open environment, while promoting materials that require systems which do not exist sufficiently or at all.

3. Consequences

Even in the United Kingdom, and Switzerland — which have well-developed systems for collection, recycling, industrial composting, and landfill — plastic litter in the open environment remains a serious and persistent problem.

Large-scale UK analyses show that despite government efforts plastic accounts for over 70% of all litter items recorded nationwide, and that accumulation is particularly pronounced in:

- Rural areas
- Countryside and recreational spaces
- Parks, footpaths, hedgerows, rivers, lakes and beaches

Failure to adopt technologies designed to mitigate the environmental persistence of escaped plastics means that avoidable harm continues, even where solutions exist.

4. Scientific evidence and regulatory inconsistency

Symphony and the Biodegradable Plastics Association have submitted extensive scientific evidence, including independent laboratory testing and long-term field studies, demonstrating that:

- Properly formulated oxo-biodegradable plastics fully biodegrade;
- They do not create persistent microplastics;
- They are capable of contributing to reduced environmental persistence of plastic litter on land and at sea.

However, the SUPD does not clearly distinguish between:

- Oxo-degradable plastics that merely fragment; and
- Oxo-biodegradable plastics designed to convert into biodegradable materials

This lack of clarity has persisted despite evolving scientific evidence, and despite the EU's own stated commitment to evidence-based regulation and to the principles embedded in REACH.

5. Compostable plastics and environmental trade-offs

We also note that plastics marketed as compostable are frequently presented as the preferred alternative, despite the fact that:

- Without industrial composting facilities, they persist in the environment in much the same way as conventional plastics;
- Even where such facilities exist, the relevant standards (e.g. EN13432, ASTM D6400) require conversion of 90% of the material into CO_2 within 180 days, producing greenhouse gas rather than soil-enhancing compost.
- Many industrial composters do not want plastic of any kind in their facility. You will be aware that the United States Dept of Agriculture has banned plastics marketed as compostable from organic composting.

This raises legitimate questions about whether current policy preferences always align with optimal environmental outcomes, particularly in climate-constrained and infrastructure-poor regions

6. Request for regulatory clarity

We do not believe that the intention of the SUPD was to worsen environmental outcomes or to restrict access to potentially beneficial technologies. However, in the EU and many parts of the world, this has been the unintended result.

We therefore respectfully request that the European Commission:

- Re-examines the treatment of oxo-biodegradable plastics in light of the full body of available scientific evidence;
- Provides regulatory clarity that recognises the distinction between fragmentation and biodegradation;
- Allows countries, particularly those without adequate waste infrastructure, to adopt complementary solutions without fear of conflicting with European policy.

Plastic pollution is a global issue. A regulatory position that does not reflect the diversity of waste realities risks contributing to greater long-term harm in terrestrial and marine environments.

We submit that evidence-based leadership, and technical innovation, rather than categorical exclusion, would better serve both environmental protection and global sustainability objectives.

Yours faithfully

Michael Laurier
CEO

Antilles General Trading LLC

European Commission
Directorate-General for Environment

12th March, 2026

Dear Sirs,

RESPONSE TO CALL FOR EVIDENCE – EVALUATION OF DIRECTIVE (EU) 2019/904 (SUP DIRECTIVE)

We are located in the United Arab Emirates and are members of the Biodegradable Plastics Association (BPA).

The UAE enacted a law in 2009, making it mandatory for disposable plastics to be oxo-biodegradable and UAE Standard 5009/2009 was subsequently developed to regulate their production and use.

Saudi Arabia also passed a similar law in 2016 and Bahrain followed soon thereafter.

These developments were the result of the acute plastic pollution problem in these countries which improved significantly after the introduction of the laws and standards.

It is therefore unfortunate that after the earlier successes, these countries are now hesitant to enforce their laws, largely due to confusion resulting from the EU Plastics Directive, leading to some now considering recycling and products like paper and compostable plastics as alternatives to oxo-biodegradable plastics. This is despite the low levels of recycling globally, as well as the fact that these alternatives are less environmentally friendly, more expensive and are generally inferior to oxo-biodegradable plastics for the relevant applications.

Given that the problem is plastic that escapes collection, it is baffling that composable plastics, for example, is one of the alternatives being considered, given that they are not designed to degrade in the open environment and so cannot be a part of the solution to the plastic pollution problem.

Considering the above and in the interest of the environment, it is imperative that the EU recognises the difference between oxo-degradable and oxo-biodegradable plastic and corrects the Directive accordingly. In addition, the case for the use of oxo-biodegradable plastics is based on irrefutable scientific evidence and so their use should be encouraged, as recommended by the BPA.

We therefore look forward to the modifications to the Directive in order to make this possible.

Yours faithfully for **ANTILLES GENERAL TRADING LLC,**

Winston Pryce
MANAGING DIRECTOR

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Formal Statement on the Role of oxo-Biodegradable Plastic Technology in Addressing Global Plastic Pollution

To: EU (European Union) Parliament and Environmental Authorities

From: RES USA - a Member of the Biodegradable Plastics Association (BPA)

Subject: The Urgent Need for Regulatory Recognition of Oxo-biodegradable Technology

1. The Reality of Plastic Pollution in Our Region

As active member of the Biodegradable Plastics Association (BPA), we are writing to highlight a critical environmental challenge. Even though the USA has less problems related to litter compared with other regions in the planet because the USA has a higher investment in the waste management system, better local infrastructure for collection and a well-managed landfill system, litter is still a problem, and the industrial composting is severely limited, almost none.

Consequently, we can still observe litter of single-use plastic and packaging still into the open environment. Traditional plastics persist for decades, fragmenting into harmful microplastics that contaminate our soil and waterways. In this context, oxo-biodegradable plastic technology is not merely an alternative; it is a vital environmental safeguard.

2. The Solution: Oxo-Biodegradable Technology

We are committed to educating the public and policymakers on the long-term solution to environmental leakage: manufacturing single-use plastics and packaging with oxo-biodegradable technology.

This technology ensures that if plastic escapes into the open environment, it will degrade and biodegrade in the presence of oxygen much faster than conventional plastic, ultimately being consumed by bacteria and fungi. This leaves no toxic residues and no microplastics behind, providing a "failsafe" for materials that cannot be captured by recycling streams.

These conclusions are not my opinion, they are fact. Biodegradation and no microplastics left behind were proved to be true by several tests done by the most important universities, laboratories and research institutions around the planet including several of those located in Europe.

3. Regulatory Barriers and the Impact of the EU Plastics Directive

Despite the clear benefits, we frequently encounter hesitation from customers who quote the EU Single-Use Plastics Directive. This directive has created a climate of uncertainty that discourages the adoption of this technology.

By failing to distinguish between "oxo-degradable" (which merely fragments) and "oxo-biodegradable" (which fully biodegrades), the EU is inadvertently allowing plastic pollution to increase. We contend that the EU is currently responsible for the continuing accumulation of plastic waste in our environment by obstructing a proven solution that is tailored for regions where 100% waste collection is not yet a reality.

4. The Scientific Case

We must ask: How can the EU continue its opposition to this technology in the face of mounting scientific evidence? As detailed in the BPA's formal submissions, rigorous testing has proven that oxo-biodegradable plastic works as intended. The EU's current position is scientifically incorrect and, more importantly, environmentally harmful. It prioritizes a "one-size-fits-all" regulatory approach over the practical necessity of preventing long-term environmental accumulation.

5. BPA Recommendations for Policy Correction

We fully support and echo the BPA's recommendations to correct this regulatory oversight:

Recognition of Distinction: The Directive must be corrected to recognize the fundamental scientific distinction between oxo-degradable and oxo-biodegradable plastic.

Legislative Amendment: We call for the amendment of Article 5 and Article 3(3) to accurately define and regulate oxo-biodegradable materials based on their ability to biodegrade in the open environment.

Encouragement of Use: Governments should permit and actively encourage the use of oxo-biodegradable technologies, recognizing their proven environmental benefits as a secondary defense against plastic pollution.

The cost of inaction is the continued degradation of our natural ecosystems. We urge a science-based revision of these policies to support technologies that offer a genuine solution to the plastic crisis.

Nivaldo Bosio – CEO RES USA

The Bassiouni Group
45 Rockefeller Plaza
Suite 2000
New York, NY 10111
USA

European Commission – Directorate-General for Environment
1049 Bruxelles/Brussel, Belgium

Re: Response to Call for Evidence – Evaluation of Directive (EU) 2019/904 (SUP Directive)

The Bassiouni Group specializes in corporate sustainability and is committed to reducing the environmental impact of plastic litter by working closely with clients and partners. As a supporter of the Biodegradable Plastics Association (BPA), we welcome the opportunity to contribute to the EU Commission's evaluation of Directive (EU) 2019/904 ("SUP Directive").

First, we are concerned that the ban on "oxo-degradable plastic" in Article 5, and its associated Guidance Note, fail to distinguish between oxo-degradable and oxo-biodegradable plastics, creating confusion and effectively preventing the use of oxo-biodegradable plastics in the EU. As a result, conventional plastics are still being used, persisting in the environment for decades and contributing to pollution. In contrast, oxo-biodegradable plastics—which are designed to biodegrade if they escape into the environment, leaving no microplastics or toxic residues—are unnecessarily and unjustly restricted.

Secondly, based on our work with clients and partners in the EU, we know that oxo-biodegradable plastic technology is a vitally important option precisely because of the lingering issues of plastic pollution in the open environment – particularly due to the inherent limitations of regular plastic and limited recycling rates. That is why we support the development of innovative technologies to address environmental concerns, and we believe that oxo-biodegradable plastic technology (as used in single-use plastic and packaging) provides a timely solution and "insurance policy".

As a company that has engaged in corporate sustainability for almost two decades, we believe it is important to provide the necessary education and awareness around oxo-biodegradable plastic

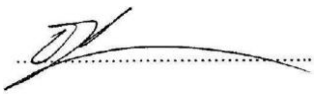
technology. However, we often find that numerous business and governmental audiences (including clients) cite the EU Plastics Directive, which makes them hesitant to use oxo-biodegradable plastic products. Unfortunately, this can lead to an increase in plastic pollution in the absence of this type of solution.

We are concerned that the EU has taken a position against the technology, despite mounting evidence that it works, as explained in the BPA submission. The EU's current position is scientifically incorrect and may be environmentally harmful. Therefore, we support the BPA's recommendations that:

- The Directive should be corrected to recognise the distinction between oxo-degradable and oxo-biodegradable plastic.
- Amend Article 5 and Article 3(3) to define and regulate oxo-biodegradable materials accurately.
- Permit and encourage the use of oxo-biodegradable technologies, given their proven environmental benefits.

We appreciate your consideration and ongoing commitment to an "environmental policy that protects, preserves and improves the environment for present and future generations while promoting sustainable development."

Sincerely,



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March 13th, 2026

To: European Commission, Directorate-General for Environment

Dear Sir or Madam,

I am writing to you as the Assistant General Manager of **AmTopp Concentrates**, a masterbatch manufacturing business based in Texas, United States. We supply plastic additive solutions used by plastic manufacturers in the US and other regions, and our product portfolio includes additives designed to improve the environmental performance of conventional plastic products.

In the United States, plastic pollution in the open environment remains a serious challenge. While recycling, reduction, and reuse are essential pillars of responsible waste management solutions, it is widely recognized that significant quantities of plastic still escape collection and recycling systems, and ultimately enter the natural environment, including soil and waterways. These materials can persist for decades, and often fragment into microplastics.

Several U.S. states have introduced policies aimed at limiting the use of certain plastic products, such as plastic bags. While these measures represent positive steps, they do not fully address the reality that substantial amounts of plastic waste continue to enter the open environment despite existing waste management practices and systems.

For this reason, technologies that enable plastics to biodegrade if they escape into the open environment - such as the oxo-biodegradable plastic technology - can play an important complementary role. These technologies are particularly relevant for short-life products such as plastic bags, packaging films, and other plastic materials that are susceptible to becoming litter. The purpose of these technologies is not to replace recycling or responsible waste management practices, but to provide an additional safeguard in situations where plastic waste cannot realistically be recovered or recycled.

There is a growing body of scientific research indicating that advanced oxidation-based biodegradable technologies can facilitate the conversion of polyolefin plastics into materials that can subsequently be biodegraded by naturally occurring microorganisms, without leaving persistent microplastics behind. Studies conducted by independent research institutions and testing laboratories have demonstrated that these materials can biodegrade more efficiently than conventional plastics when exposed to the right environmental conditions.

However, we have observed firsthand significant reluctance among customers and policymakers in the United States to adopt these technologies. In our experience, customers and regulators frequently refer to regulations in the European Union, including the **Single-Use Plastics Directive (SUPD,)** when evaluating whether such technologies should be adopted.

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The European Union plays a leadership role in global environmental policy, and EU legislation is often cited by industry leaders and regulators in other regions, including North America. The SUP Directive does not clearly distinguish between oxo-degradable materials and oxo-biodegradable technologies, and it has since created uncertainty in the markets. In many cases, this uncertainty has discouraged the adoption of technologies that could help address the accumulation of plastic waste in open environment.

For these reasons, we respectfully support the recommendations of the Biodegradable Plastics Association (BPA) that the evaluation of Directive (EU) 2019/904 should:

- Recognize the clear scientific distinction between oxo-degradable and oxo-biodegradable plastic technologies.
- Revise Article 5 and Article 3(3) to accurately define and regulate materials designed to biodegrade following oxidative degradation processes.
- Permit and encourage the responsible use of verified oxo-biodegradable technologies, where these technologies can help mitigate the accumulation of plastic waste in the open environment.

Plastic pollution is a global issue that requires a range of complementary solutions. Technological innovations that address the reality of environmental leakage should be carefully evaluated based on sound scientific evidence.

We hope the Commission will use this evaluation as an opportunity to provide greater regulatory clarity and ensure that environmentally beneficial technologies are assessed based on the latest scientific findings.

Thank you for the opportunity to contribute to this discussion.

Sincerely,

Jonathan Ma

Jonathan Ma
Assistant General Manager
Inteplast Group / AmTopp Concentrates

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