Nonwoven industry's response to the Eunomia study on the plastics deAnition under the Directive (EU) on the reduction of the impact of certain plastic products on the environment

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EDANA, the voice of the nonwovens and related industries fully supports EU's Plastic Strategy aiming to reduce the plastic waste and increase the recycling rate of plastics. In particular, EDANA welcomes the Directive (EU) on the reduction of the impact of certain plastic products on the environment (hereinafter referred as SUP Directive) and supports the efforts for its successful implementation at national level.

To further clarify whether a product is to be considered a single-use plastic product for the purposes of the SUP Directive, the European Commission's DG ENV is currently working on guidelines on single use plastic products. This document will be published by 3 July 2020.

In order to contribute Industry expertise (both technical and market-related) to better reµect the reality of the marketplace, EDANA has contributed at every stage of the formal consultation process and has participated in every Commission workshop on this matter.

Man-made cellulose fibres (MMCF) lyocell and viscose are not plastic materials

Current European legislation as well as technical expertise conclude that lyocell and viscose are not chemically modihed natural polymers and as such should be excluded from the dehnition of plastics. Furthermore, there have been multiple independent studies done by scientihe experts to demonstrate lyocell and viscose's biodegradability and µushability properties in several environments and demonstrating that they are more sustainable than fossil-based plastic hares (references listed below).

EDANA has read with concern the claims made in the study "What is Plastic?" published by Eunomia on January 21st 2020. EDANA finds it unfortunate that the authors of the report have overlooked multiple independent scientific studies which demonstrate the sustainability attributes that Lyocell and Viscose can bring to everyday products.

Below we wish to point to key arguments and studies regarding the structure of viscose and lyocell and the biodegradability and µushability of those materials—which provide compelling counter arguments to those stated in the study.