

**ECF comments to the Roadmap on the EC initiative Policy Framework on
Biobased Plastics (BBP), Biodegradable and Compostable Plastics (BDPC)
(October 2021)**

The European Coffee Federation (ECF) and its members are committed to ensure that Single Serve Units (SSU) meet a proper end of life that enables full circularity and maximization of resource efficiency for the category, in line with the policy objectives of the European Green Deal and the new Circular Economy Action Plan (CEAP).

For over a decade, our members have been actively working to ensure an appropriate end of life to the SSU they place on the market. There is a strong sector commitment, having heavily invested in different proprietary and collective approaches that have been implemented on a national level in many Members States.

There is a broad variety of SSU (aluminium, plastic, paper and compostable) on the European market that require a different approach as to how they are best recycled depending on their classification as packaging (empty after use SSU) or casing (rigid and soft SSU). Moreover, the recycling and disposal methods and regulations differ per EU country and even per region within a country, adding another layer of complexity to the collection, sorting and recycling of SSU.

A coherent and predictable regulatory landscape is fundamental for sustainable investments and needs to provide industry with freedom of material choice that allows space to innovate and to compete, while focusing on improved overall product environmental footprint.

Today, our members continue to work on both packaging and casing that is reusable or recyclable via material recycling systems as well as compostable. ECF and its members support the use of compostable materials that can be disposed of jointly with bio-waste, provided their use is aligned with the bio-waste treatment infrastructure (home or industrial) in selling markets. Composting (or “organic recycling”) is a dedicated recovery option for biodegradable materials for which the EU needs to ensure policy coherence between European and National legislation.

ECF and its members welcome the European Commission initiative to establish a credible and harmonised regulatory framework for biobased plastics (BBP), biodegradable and compostable plastics (BDPC) based on recognised international standards and science, calling upon the EU to:

- **Maintain business operators’ freedom of material choice.** Innovation in packaging and casing materials and end-of-life infrastructure solutions is crucial for a

competitive European industry. A political framework should enable this freedom and focus on conditions supporting circularity.

- **Ensure clarity of definitions.** A clear distinction is to be made between, biobased, biodegradable and compostable plastics to ensure that there is an appropriate end-of-life infrastructure and to avoid consumer confusion.
- **Develop an EU Standard** establishing technical requirements and evaluation criteria for packaging and casing materials aimed to be composted in home composting units.
- **Launch consumer campaigns** aiming to create awareness on correct disposal of BBP and BDCP and to boost consumer engagement in circularity.
- **Ensure the integrity of the Single Market** by defending policy coherence between European and National legislations such as the French and German biowaste management policies.

The European coffee sector is committed to ensure that Single Serve Units meet a proper end of life. The European coffee sector is ready to work collaboratively and invest accordingly, to ensure, that there is an infrastructure in place and that consumers are provided with the necessary information to enable the full circularity of the Single Serve Unit category.

The European Coffee Federation (ECF) is the representative organisation for the European coffee trade and industry, speaking for over 750 companies ranging from SMEs to internationally operating companies, representing approximately 35% of the world coffee trade volume. ECF offers its members a forum for exchange, identifying industry-wide issues of common interest in the areas of food safety, sustainability and international trade.



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