

Foopak Bio Natura status under the Single-Use Plastic Directive

This letter provides information on the position of **Foopak Bio Natura** under Directive (EU) 2019/904 on the reduction of the impact of certain plastic products on the environment (SUP Directive).

The objectives of the SUP Directive are to prevent and reduce the impact of certain plastic products on the environment, in particular the aquatic environment, and on human health, as well as to promote the transition to a circular economy with innovative and sustainable business models, products and materials, thus also contributing to the efficient functioning of the internal market. As a forerunner of the circular economy and a key player in the field of sustainable alternatives to plastic products, **Foopak Bio Natura** supports and promotes the goals of the SUP Directive.

Foopak Bio Natura is a nano technology water-based dispersion coated barrier board, the applicability of the SUP Directive depends on:

The SUP Directive applies to certain single-use products that are *made wholly or partly from plastic*.

SUP Directive defines plastic in Article 3(1) [plastic definition]:

“‘plastic’ means a material consisting of a polymer as defined in point 5 of Article 3 of Regulation (EC) No 1907/2006, to which additives or other substances may have been added, and which can function as a main structural component of final products, with the exception of natural polymers that have not been chemically modified”

According to the SUP Directive’s text, products will, therefore, fall under the scope of the SUP Directive if they are made wholly or partly from plastic, i.e. a material, which:

- i. consists of a polymer (in the meaning of EU Regulation 1907/2006);
- ii. which is not an unmodified natural polymer; and
- iii. which can function as a main structural component of final products**

The latest 4th draft (April 2021) of the implementation guidelines excludes paper- and board-based material in general from the scope of the SUP Directive and allows typical polymeric materials, such as retention agents, binders, and processing aids used in the production process, as part of the board. The SUP Directive itself expressly excludes paints, inks, and adhesives from its scope.

Foopak Bio Natura, a nano technology water-based dispersion coated barrier board contains modified polymers And these polymers included water-based barrier dispersions is not function as a main structural component in the production process. Notably, they do not hold shape and require a substrate for structure as we had modified polymer constructure that are not main structural component in the production process. Most importantly the product is not a composite material and can play function as mono-material as same as normal pigment coating on the top side of the paper during manufacturing process.

Foopak Bio Natura had proven its environmentally friendly product which can recycle easily comply with EN 13430 biodegradable in natural condition and had received home and industrial compostable certificates based on EN 13432 and home composting measurement..

Supported by 3rd party analysis, Foopak Bio Natura should exclude as materials falling under the SUP Directive.



Eric Lin,
Technical Director

References:

- 1) ISO 472:2013 Plastics-Vocabulary,
- 2) EPDLA statement on Polymer dispersions and SUPD, April 2021,
- 3) Flustix NO PLASTIC analysis by Wessling

Directive:

<https://eur-lex.europa.eu/eli/dir/2019/904/oj>

https://eur-lex.europa.eu/eli/reg_impl/2020/2151
