

Dear Director-General GROW,

We are writing to provide feedback on the European Commission's Single-Use Plastics Directive (SUPD). The directive focuses on reducing marine litter which is an environmental issue that requires urgent action. We laud the EC for taking the global lead in introducing policy measures on this issue.

We understand that for the purposes of the Directive, consultation is ongoing among member states for publication of guidelines on examples of single-use plastic products. As a leading global producer of viscose fibers, which is a material used in nonwoven products such as feminine hygiene products and wet wipes, we would like to submit to you that unlike plastic, viscose fibers are 100% biodegradable.

Along with peers in our Industry, we are deeply concerned with the EC's current technical definitions and inclusion of natural fibers like viscose and lyocell as "plastic". The lack of science-based investigation on such classifications will have unintended consequences.

Attached with this letter is an articulation of the risks of misclassification of natural fibers in the SUPD and our recommendations to the EC. We urge the EC to study and consider our views which are also shared by the industry. We are ready to engage in discussions at your earliest convenience.

Thank you.

Yours Sincerely,



February 26, 2020

**Sateri (Shanghai) Management Limited**  
23rd Floor, East Tower Zhongrong Hengnn  
international Piara 620 Zhangyang Road.  
Pudong Shanghai 200122 China

Mainline (86-21)3861-6888 Fax:  
(86-21)3861 6899  
Website [www.sateri.com](http://www.sateri.com)

The objectives of the Directive (EU) 2019/904 (on the reduction of the impact of certain plastic products on the environment) 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".

Industry is very concerned with the current technical discussions on the definition of "plastic" (under the SUPD-related guidelines and implementing acts) and on the definition of natural polymers that have not been chemically modified (viscose and lyocell fibers) - and with the lack of scientific-based discussions.

### **What are the risks with the current "Plastic" definition in the SUPP?**

- Using inaccurate definitions (based on unsubstantiated scientific evidence), risks having much broader effects beyond SUPD, and into other sectors such as textiles and industrial applications. In such a scenario, cotton used in textiles would consequently be defined as a 'plastic', as well as multiple pulp paper products, and even toilet paper.
- Defining viscose and lyocell as plastic would restrict the nonwoven industry from having access to sustainable and biodegradable solutions in applications especially targeted at health, hygiene and medical segments.
- It would penalise environmental-friendly companies which are developing and investing in sustainable alternatives to fossil-based products in Europe - and deter them from innovating further in this direction.

### **Our recommendations to the European Commission:**

- The implementation of the SUP Directive should ensure that it accurately targets plastic products that are harmful to the environment.
- It should establish clear definitions and guidance to avoid any legal uncertainty - and should focus on the scope of the Directive, namely on the single use of plastics.

- A successful SUPD Legislation should be consistent with other policy initiatives such as the Green Deal and more particularly the Circular Economy Action plan, which aim to promote sustainable industrial practices.
- Make a distinction among the fiber categories in the marketplace - they have different sustainability attributes. Viscose and lyocell cellulose fibers are used in various consumer applications. They are produced from the renewable raw material wood, and are natural polymers that have not been chemically modified, hence they are "NOT PLASTIC". Scientific data confirm their biodegradability within approx, ten weeks in fresh and marine water and hence do not contribute to the plastic and microplastic pollution in the environment.
- Impose labelling which accurately addresses the problem of sewage blockages and marine litter. A Water UK study 2017 shows that sewage blockages are predominately caused by flushing wet wipes which are not flushable - which mainly consist of polyester fibers (plastic).
- Focus efforts on correct labelling of wet wipes and sanitary towels containing plastic - for informing consumers about the materials and how to dispose them it (e .g. DO NOT FLUSH and Tidy Man Logos).
- A successful Green Deal In Europe will require a collaborative effort between all value- chain actors as well as with other industrial sectors which will be impacted by Legislation. We are ready to engage.