

Dear Ms Nelen,

I am writing to request a teleconference call on behalf of Eastman, a global advanced materials and specialty additives company, on the issue of the Single Use Plastics (SUP) Directive's implementation in the European Union.

While a ground-breaking piece of legislation aimed to tackle marine litter, the SUP Directive, in its current form, contains loopholes that will severely undermine its intent, notably the definition of "plastic" and impact on innovative new materials.

The Directive excludes 'natural polymers that have not been chemically modified' from being considered as "plastic", which, depending on interpretation, opens possible material substitution loopholes in every product category regulated under the Directive.

As the European Commission is working on finalizing a guidance document to clarify several areas of ambiguity, including the aforementioned concepts, a restrictive, precautionary approach should be taken when clarifying the notion of "plastic" in the SUP Directive. An open interpretation could lead to a wide range of products from wet wipes to bottles, disposable plates and cutlery being labelled 'non-plastic', causing confusion for citizens and retailers as well as creating disparities among manufacturers of polymeric materials.

Before any exemptions are granted under the SUP Directive, these should first be supported by robust scientific data. However, there is currently no existing data to prove that any alternatives to traditional plastics, even biodegradable, do not adversely impact the environment. To apply a broad interpretation to the definition of "plastic", and give rise to such exemptions, could lead to the avoidable prevalence of millions of persistent single use items in the environment.

This issue is due to be discussed at an informal meeting, involving Member State experts, on 24 April. Therefore, given the pressing nature of this matter, I hope you are available to discuss this issue in further detail at a time convenient to you.

Yours sincerely,



Eastman Chemical Company