



To the Editor,  
Susan Goldberg  
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London, June 8<sup>th</sup> 2018

Dear Susan Goldberg,

Our trade associations represent the producers of certified compostable materials including “bioplastics”, and we are linked with members around the world. The UK, USA and European associations are co-signatories to this letter.

The article recently published by National Geographic and written by Laura Parker linked here <https://www.nationalgeographic.com/magazine/2018/06/plastic-planet-solutions-waste-pollution/> has caused a certain amount of dismay among our membership.

While we are thrilled to see your illustrious, prestigious and authoritative journal tackle the monumental problem of plastic waste, the recent issue appears to also transmit a series of misconceptions around bioplastics which our membership does not recognize or associate itself with.

Our members work to certified standards, recognized in the USA and globally, around the end of life of their materials. They recommend these materials only as solutions for certain uses, not as a panacea for every plastic issue. They certainly do not promote the use of bioplastics as a solution for marine littering and know that there is no such standard nor any material made by them that would biodegrade in a short time in the ocean. Nor would any of our members want to be associated with a message that says “throw this out the window or into the river, Mother Nature will take care of it.”

Bioplastics can be a confusing term in itself but it is not the only material that can be defined in many different ways. Just as there are many types of paper, plastic, textile or metal, there are several types of bioplastics. You can see more about definitions here [http://docs.european-bioplastics.org/publications/fs/EuBP\\_FS\\_What\\_are\\_bioplastics.pdf](http://docs.european-bioplastics.org/publications/fs/EuBP_FS_What_are_bioplastics.pdf)

Here we are specifically talking about bioplastics that claim to biodegrade. As biodegradation can happen anywhere and can take years, or centuries, in order to certify a bioplastic as “biodegradable” we need to have standards. Otherwise biodegradable can mean anything, sooner or later.

Because biodegradation needs to have a sense, it needs to happen in a short time span to avoid materials laying around in the environment for years. For packaging, we have an internationally agreed standard which defines biodegradability in industrial composting. In Europe it is the EN13432 and in the USA it is the ASTM 6400. The BPI in the USA certifies these.

We have other standards, though not many, including biodegradable film mulch used in farming, recently introduced in the EU. That there are not many is because there are few products actually that can define time and place of biodegradation.

So producers of compostable plastics certified EN13432 or ASTM 6400 claim ONLY that their products biodegrade in a time and place. Not in the sea, the river, the street but in an industrial composting plant. Other standards set out voluntary protocols (not recognized under EU law) for home composting, but the variable nature of home composting makes certification of that more difficult.

We want this concept to be clear : only by defining a time and place of biodegradation can we be sure it happens and measure its success.

The advantage of a compostable plastic is that it can be recycled into compost. As you rightly point out in the article, most plastic is not recycled. Almost all plastic film cannot be recycled. Plastics used to package food are especially difficult because food cannot be recycled mechanically with plastics- but conversely, food can be recycled with compostable plastics through composting.

And compostable plastics assist the collection and treatment of food, the largest category of material being wasted today. This is what our members do. They invest millions in making this work, they have industrial scale plants producing these materials. They are not vendors of illusions nor claims as some make to “disappear into the environment” without having the standards defined or certifications to match these claims.

Bio-plastics are a very small part of the plastics universe, about 0,6% of total production or 2 million tonnes. Of these less than half are compostable. The claim that these will damage plastics recycling (which captures less than 20% of 350 million tonnes) is therefore disingenuous. Environmentally the focus has to be on reducing plastic use, substituting non- recyclable plastics with recyclable plastic, introducing compostable bio-plastics where they have a role in reducing overall waste and improving food waste capture.

Incidentally a driver for this is desertification, and the loss of topsoil. By composting more materials and recovering compost to substitute the loss of topsoil, we can help provide longer term sustainability for farming which suffers from erosion, loss of organic matter and reduced fertility. It is one of the most pressing global environmental priorities and our members are proud to be able to contribute to the soil-to-soil circular loop. We suggest you see the film Dirt.

We'll also join forces with like-minded corporations, nongovernmental organizations, and other institutions, in efforts to reduce single-use plastic consumption, making what's left either recyclable or compostable, and we'll support the National Geographic Society's network of scientists, innovators, and explorers who are tackling this challenge worldwide. In the UK the association BBIA is a founder member of the Plastics Pact whose ambitions are just those- to ensure all plastics packaging is recyclable or compostable by 2025.

We invite you to join our webinar on bioplastics taking place on June 26<sup>th</sup> at 3pm London time (10am DC time) and for Laura Parker to join us and participate in the debate. The subject is to explode some of the myths around our work, which modestly wants to make one of many valuable contributions being made by many people around the world and is profoundly aware that this is limited in terms of the size of the plastics pollution issues we face.

We would also welcome the opportunity of meeting with you to illustrate the products and scope of our work.

You can see our Myth Buster here <http://bbia.org.uk/faq/>

Sincerely,

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