



Registered Office: Peershaws
Berwyk Hall Court
Bures Road
White Colne
Essex
CO6 2QD
Telephone: 01787 226995
E-mail: admin@bbia.org.uk

Department of Business, Energy, Industrial Strategy
1 Victoria Street, London SW1H 0ET
Attn Mark Turner

January 19th, 2017

Re: Your bioeconomy consultation

Dear Mark,

as evidence to the consultation we will be sending the response through the BEIS website before 29th January and we have given you further evidence *in person* with the visits of delegates from Novamont and Sphere this last week.

Attached you will find Case Studies of BBIA members evidencing how their businesses operate, and what could be done to make them grow further. These are all small to medium size enterprises, the backbone of British industry and representative of the bioeconomy in the UK.

The message which comes clearly from all of them is that the policy frameworks which influence their companies need some modification in order to enable scale up of investments, jobs and exports. Within the consultation you will find a series of policy suggestions which reflect these answers.

Secondly I have given you plastic food service bags, containing fresh vegetables. As you will see they are not recyclable. In fact they carry the logo "Plastic not currently recycled".

This gives lie to the claims from some parts that plastic films are widely recycled and that compostable films would contaminate recycle chains. Evidence shows this not to be the case because plastic films are not widely recycled in the first place, only 4% are and these are mainly clingfilm from pallet wrap returned by supermarket warehouses and storage areas.

Were these bags to be made of compostable films (technically they can be with no detrimental effect upon the lifespan or quality of the contents) the films could be recycled through the food waste collection systems back to compost. However, supermarkets will not move on this singly because it requires a certain supply chain disruption and costs more to use compostable plastic than ordinary non recyclable plastic. Currently costs are 2 to 3 times those of traditional PE as the scale of production is simply too small to compete with Far East imported products produced on a huge scale.

To make and import into the UK plastic materials which then have a detrimental effect upon the environment (being non recyclable) is of course usually easier and cheaper than to make a plastic material that can be produced and recovered within the UK itself. Nevertheless, despite knowing and declaring that their packaging is not sustainable, no supermarket will undertake to spend more



than their competitors purely on a voluntary basis driven only by environmental pressures; nor will a food supplier pack in compostable packaging because they will not be able to obtain the price increase from the supermarket to cover the cost. So unless Government policy *mandates* the change, little or nothing will change. Change cannot rely upon the voluntary goodwill of certain decision makers- some change has to be mandated if one wishes to obtain an end result (look at lead in petrol, POPs/REACH rules, as just two examples of policy driving change).

Which is why Government policy leadership is vitally important in some sectors and why we ask that Government policy *mandates* the use of compostable packaging in short-life food retail sales (sandwich boxes, fish, meat, bread, vegetables, fruit, cakes) where non recyclable packaging is currently used.

Such a change in policy would lead to the sales and production of several thousand tons of biopolymers in the UK, with consequent increases in investments, jobs, exports and HMRC tax receipts and would cost zero to the Exchequer and an unnoticeable, fractional cost to the consumer.

There may be an objection that AD plants cannot handle compostable packaging. The answer is that if AD plants know they will HAVE to handle it, they will do so, because this policy change will mean increased feedstocks for them (compostable packaging is handled by AD elsewhere in Europe, why not in the UK ?) Handling bioplastics is simply a technical matter. Again, Government policies can enforce change of practice to the advantage of the economy and environment if the end result is desired.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'David R Newman', with a stylized flourish at the end.

David R Newman
Managing Director