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European Commission
Directorate-General for Environment
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Dear Sir/Madam

Subject: Impact of Directive (EU) 2019/904 on Environmental Solutions and Global Markets – Symphony Environmental Technologies Plc

I write on behalf of Symphony Environmental Technologies Plc, a UK–based manufacturer of plastic masterbatch technologies. Symphony is a public company quoted on the London Stock Exchange, and has operated for over 35 years. It is accredited to ISO 14001 and 9001 and is internationally recognised as the leader in oxo-biodegradable plastic technology.

Our technology was developed in close collaboration with Professor Gerald Scott, Professor of Chemistry at Aston University, and inventor of oxo-biodegradable plastics; and continues to be supported by ongoing research with universities and independent laboratories worldwide. Symphony is a leading member of the Biodegradable Plastics Association, and we agree entirely with the BPA submission to your call-for-evidence.

We are writing to share our experience of the practical and unintended consequences of Article 5 of the Single-Use Directive (EU) 2019/904 on environmental outcomes in the United Kingdom and, critically, on other markets outside the European Union.

1. Market exclusion and global regulatory signalling

Art. 5 bans oxo-degradable plastic, but is widely and mistakenly thought to apply to oxo-biodegradable plastics as well, thus excluding oxo-biodegradable plastics from the European market, and from other countries where waste collection, recycling, and industrial composting infrastructure is insufficient or does not exist at all.

Despite the fact that oxo-biodegradable technology has been proven to work, and is not actually banned by the SUP Directive, there are still many systemic barriers to using it worldwide, because:

- Multinational brand owners and converters align global material choices to EU regulatory positions;
- Export-oriented manufacturers are reluctant to adopt materials perceived as non-compliant with EU policy;

- Policymakers in non-EU countries routinely cite the SUPD as justification for rejecting oxo-biodegradable plastic, (confusing it with oxo-degradable plastic, which *is* banned) even where no domestic assessment has been undertaken.

2. Structural assumptions within the SUPD

The SUPD is explicitly built around a circular economy model, which assumes:

- Effective waste collection
- Functioning recycling systems or industrial composting
- Managed end-of-life pathways

This is problematic for countries — including many in Africa, Asia, and Latin America — where large amounts of plastic leak into the environment precisely because the ability to collect all the waste plastic for processing does not exist.

Plastics which are marketed as "compostable" and are promoted under current policy narratives, also fail in the absence of controlled collection and industrial composting facilities. The Directive, however, provides no policy space for complementary solutions designed to mitigate environmental harm when waste inevitably escapes from a circular economy.

This creates a regulatory paradox:

The EU bans a technology designed to address plastic in the open environment, while promoting materials that require systems which do not exist sufficiently or at all.

3. Consequences

Even in the United Kingdom, and Switzerland — which have well-developed systems for collection, recycling, industrial composting, and landfill — plastic litter in the open environment remains a serious and persistent problem.

Large-scale UK analyses show that despite government efforts plastic accounts for over 70% of all litter items recorded nationwide, and that accumulation is particularly pronounced in:

- Rural areas
- Countryside and recreational spaces
- Parks, footpaths, hedgerows, rivers, lakes and beaches

Failure to adopt technologies designed to mitigate the environmental persistence of escaped plastics means that avoidable harm continues, even where solutions exist.

4. Scientific evidence and regulatory inconsistency

Symphony and the Biodegradable Plastics Association have submitted extensive scientific evidence, including independent laboratory testing and long-term field studies, demonstrating that:

- Properly formulated oxo-biodegradable plastics fully biodegrade;
- They do not create persistent microplastics;
- They are capable of contributing to reduced environmental persistence of plastic litter on land and at sea.

However, the SUPD does not clearly distinguish between:

- Oxo-degradable plastics that merely fragment; and
- Oxo-biodegradable plastics designed to convert into biodegradable materials

This lack of clarity has persisted despite evolving scientific evidence, and despite the EU's own stated commitment to evidence-based regulation and to the principles embedded in REACH.

5. Compostable plastics and environmental trade-offs

We also note that plastics marketed as compostable are frequently presented as the preferred alternative, despite the fact that:

- Without industrial composting facilities, they persist in the environment in much the same way as conventional plastics;
- Even where such facilities exist, the relevant standards (e.g. EN13432, ASTM D6400) require conversion of 90% of the material into CO_2 within 180 days, producing greenhouse gas rather than soil-enhancing compost.
- Many industrial composters do not want plastic of any kind in their facility. You will be aware that the United States Dept of Agriculture has banned plastics marketed as compostable from organic composting.

This raises legitimate questions about whether current policy preferences always align with optimal environmental outcomes, particularly in climate-constrained and infrastructure-poor regions

6. Request for regulatory clarity

We do not believe that the intention of the SUPD was to worsen environmental outcomes or to restrict access to potentially beneficial technologies. However, in the EU and many parts of the world, this has been the unintended result.

We therefore respectfully request that the European Commission:

- Re-examines the treatment of oxo-biodegradable plastics in light of the full body of available scientific evidence;
- Provides regulatory clarity that recognises the distinction between fragmentation and biodegradation;
- Allows countries, particularly those without adequate waste infrastructure, to adopt complementary solutions without fear of conflicting with European policy.

Plastic pollution is a global issue. A regulatory position that does not reflect the diversity of waste realities risks contributing to greater long-term harm in terrestrial and marine environments.

We submit that evidence-based leadership, and technical innovation, rather than categorical exclusion, would better serve both environmental protection and global sustainability objectives.

Yours faithfully

Michael Laurier
CEO