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**GO!PHA response to draft delegated act on technical screening criteria qualifying substantial contribution to climate change mitigation and adaptation Directive 2020/852**

GO!PHA<sup>1</sup>, the Global organization for Polyhydroxyalkanoates (PHA) and our members are very concerned about the draft delegated act and Annex I thereto on technical screening criteria, determining under which conditions an economic activity qualifies as contributing substantially to climate change mitigation and adaptation.

We believe that excluding food and feed stock as a raw material for the production of renewable plastics in primary form (p. 95 Annex I) seriously undermines the potential of renewable polymers such as PHA to become a sustainable substitute for fossil fuel-based plastics.

PHA is one of the most innovative and versatile materials known to man. They are found in nature and are produced by bacterial fermentation. They biodegrade in soil, fresh water and in a marine environment. The EU has sponsored over 110 Million Euros worth of research and innovation projects in the last ten years to develop PHA for various uses as a more sustainable material than conventional plastics. A spreadsheet outlining these projects are given on the next page.

While it may be understandable that the EU does not wish to support food and animal feed crops from being used for producing renewable polymers, residues from food and feed can easily be used as a feedstock. We therefore recommend accepting food and feed crops as a feedstock for plastic in primary form. For sake of regulatory consistency we propose to align the primary plastic definition in view of food and feed crops with the Renewable Energy Directive (RED) definition: *"...food and feed crops means starch-rich crops, sugar crops or oil crops produced on agricultural land as a main crop excluding residues, waste or ligno-cellulosic material and intermediate crops, such as catch crops and cover crops, provided that the use of such intermediate crops does not trigger demand for additional land."*

The current definition for plastics in the primary directive undermines confidence and investments in our sector and contradicts recommendations of Circular Economy Strategy,

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<sup>1</sup> <https://www.gopha.org/>

EU's Bioeconomy Strategy, Horizon Europe as well as EU's better regulation and innovation principle.

Yours sincerely,

Anindya Mukherjee

CC: GO!PHA Members

List of Research Projects approved and funded within the European Union						
Grant agreement ID	Funded under	Project name	Start/End date	Country	Overall budget	EU contribution
745586	H2020-EU.3.2.6.	BioBarr	1-6-2017/31-5-2021	Italy	€3,784,375.00	€3,253,437.50
730349	H2020-EU.3.2.4.3. and H2020-EU.3.2.4.1.	RESURBIS	1-1-2017/31-12-2019	Italy	€3,377,915.00	€2,996,688.75
870294	H2020-EU.2.1.4.	MIX-UP	1-1-20/31-12-23	Germany	€7,365,335.00	€5,465,335.00
817788	H2020-EU.3.2.4.1. and H2020-EU.3.2.2.1.	SCALIBUR	1-10-18/31-12-22	Spain	€12,005,922.50	€9,999,391.39
862910	H2020-EU.3.2.5.3	SEALIVE	1-10-19/30-9-23	Spain	€10,281,120.49	€8,527,315.22
745791	H2020-EU.3.2.6.	REFUCOAT	1-6-19/31-5-20	Spain	€3,234,338.50	€2,300,735.30
773872	H2020-EU.3.2.2.3.	YPACK	1-11-17/31-10-20	Spain	€7,277,671.25	€5,996,591.02
720777	H2020-EU.2.1.4.	VOLATILE	1-12-16/30-11-20	Spain	€6,565,926.25	€6,565,926.25
88338	H2020-EU.3.2. and H2020-EU.3.5.4.	NoAW	1-10-16/30-9-20	France	€7,816,232.50	€6,887,570.00
690323	H2020-EU.3.5.4.	SMART-Plant	1-6-16/31-5-20	Italy	€9,768,806.09	€7,536,300.02
838120	H2020-EU.2.1.4. and H2020-EU.3.2.6.	INGREEN	1-6-19/30-11-22	United Kingdom	€8,775,678.83	€6,323,919.56
750126	H2020-EU.1.3.2.	CH4BioVal	18-9-17/17-9-19	Spain	€170,121.60	€170,121.60
679050	H2020-EU.3.2.	CELBICON	1-3-16/30-11-19	Italy	€6,211,040.25	€5,429,201.50
888704	H2020-EU.3., H2020-EU.2.3. and H2020-EU.	VEnvirotech	1-11-19/29-2-20	Spain	€71,429.00	€50,000.00
633962	H2020-EU.2.1.4.	P4SB	1-4-15/31-3-19	Germany	€7,056,968.75	€7,056,968.75
760994	H2020-EU.2.1.4.	ENGICOIN	1-1-18/31-12-21	Italy	€6,986,910.00	€6,986,910.00
311933	FP7-KBBE	WATER4CROPS	1-8-12/31-7-16	Italy	€7,696,538.99	€5,973,689.00
245084	FP7-KBBE	ANIMPOL	1-1-10/31-12-12	Austria	€3,754,375.00	€2,895,660.00
213068	FP7-KBBE	LIPOYEASTS	1-8-8/31-7-11	Belgium	€1,201,481.00	€911,111.00
735158	H2020-EU.3.5. and H2020-EU.2.3.1.	PAPER-P	1-9-16/1-11-16	Italy	€71,429.00	€50,000.00
718097	H2020-EU.2.3.1. and H2020-EU.3.2.	EggPlant	1-2-16/31-5-16	Italy	€71,429.00	€50,000.00
669046	H2020-EU.3.5. and H2020-EU.2.3.1.	SCALEPHA	1-5-15/31-10-15	Italy	€71,429.00	€50,000.00
812602	H2020-EU.3., H2020-EU.2.3. and H2020-EU.	POLIPO	1-6-18/30-11-18	Italy	€71,429.00	€50,000.00
867437	H2020-EU.4.	BterBioPlastics	1-5-19/30-4-21	Portugal	€147,815.04	€147,815.04
318931	FP7-PEOPLE	BIOASSORT	30-7-12/29-7-16	Italy	€296,100.00	€296,100.00
606548	FP7-SME	BIOACTIVE LAYER	1-9-13/30-9-15	Greece	€1,252,494.80	€940,000.00
625774	FP7-PEOPLE	SIMPHASRLS	1-6-14/31-5-16	Portugal	€147,210.00	€147,210.00
273515	FP7-PEOPLE	NanoBioComp	1-9-11/31-8-13	Spain	€166,565.60	€166,565.60
280604	FP7-NMP	OLI-PHA	1-6-12/31-5-15	Spain	€3,983,608.60	€3,009,976.00
604770	FP7-SME	EUROPHA	1-10-13/30-9-16	Spain	€2,093,640.80	€1,572,902.10
613667	FP7-KBBE	GRAIL	1-11-13/30-10-2017	Spain	€7,867,807.49	€5,954,479.00
32967	FP6-SME	POLYVER	15-9-6/14-12-8	Italy	€939,218.00	€600,949.00
G5RD-CT-2001-00591	FP5-GROWTH	WHEYPOL	1-12-1/30-11-4	Austria	€1,666,582.00	€1,268,682.00
FAIR961780	FP4-FAIR	PHASTICS	1-1-97/31-12-99	Netherlands	€1,335,000.00	€600,000.00
<b>Total Funding</b>					<b>€133,583,944.33</b>	<b>€110,431,550.60</b>