

# Bioplastic Feedstock Alliance

## Position on Biocontent Claims

### Why Biobased Content<sup>1</sup> Claims Matter

Honest, transparent claims are essential to the bioplastic industry's credibility with the public, and now is a critical time for public opinion on this issue. Prior to using biobased materials, BFA believes it is critically important to assess sourcing and ensure that responsible and sustainable practices are being pursued in the supply chain, and also recognizes that implementation of responsible sourcing practices is a complex process which varies across industries and feedstocks. BFA has issued extensive guidance on how this can be accomplished (<http://bioplasticfeedstockalliance.org/bioplastics/>). It is also critically important that claims regarding biobased content are credible and transparent, as the public is increasingly concerned by greenwashing and is largely confused by the multitude of certification and labeling schemes in the marketplace. Additionally, as more companies enter this quickly growing industry, there is great potential for inconsistency in the types of claims being made. For these reasons, the members of the Bioplastic Feedstock Alliance have drafted the following guidance to help ensure biocontent claims are transparent and credible.

### BFA Position on Biobased Content Claims

The BFA believes that public biobased content claims should be transparent and credible. We agree on the following guidelines when making a claim: Claims should be clear about what physical component has biobased content and should state the percentage of biobased content in that component. Furthermore, claims should only be made on components that have measurable, verifiable biobased content<sup>1</sup>, and when the biobased content in question is backed by a commitment to pursuing responsible sourcing<sup>2</sup>. We agree that a reasonable minimum amount of biobased content to make a claim is 20%<sup>2</sup> for fast moving consumer goods<sup>3</sup> (FMCG), and that it is reasonable for durable goods<sup>4</sup> to make a claim on any % of biobased content as long as the claims are transparent and meet the criteria above. All claims should be compliant with national and/or regional regulatory guidance on environmental marketing.

### BFA Position on Other Bio Claims

While public biobased content claims should only be made on components that have actual, verifiable biobased content, the BFA accepts the use of approaches like "Book and Claim" and/or "Mass Balance"<sup>5</sup>, where no physical biobased content may be contained in the final product, as long as these approaches are used as a step toward traceable biobased content and a timeline is set for achieving verifiable biobased content. However, claims based on these systems should not claim any % biobased content, should be transparent about this difference, and should comply with national and/or regional guidance on environmental claims. Additionally, the BFA agrees that these systems should be an intermediate step on the path toward a transparent, segregated and responsible biomass supply chain, and should be used as part of a strategy to achieve this goal. Therefore, having a

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<sup>1</sup> Biobased Content should be determined by a credible method. The BFA supports the use of either weight fraction based measurement as outlined in ISO 14021:1999 or the method outlined in ISO 16620-2:2015, which is determined via measurement of Carbon 14 (<sup>14</sup>C). [1] [2]

<sup>2</sup> This is consistent with the USDA BioPreferred program, RSB, and European standard CEN/TS [6], [7], which all have current minimum content requirements of 20 or 25%.

<sup>3</sup> Fast moving consumer goods are defined as consumer products that sell quickly and at a relatively low cost, and include food and beverage products, personal care products, and other consumables. [5]

<sup>4</sup> Durable goods are defined as a category of consumer goods that are purchased infrequently and last a significant amount of time. They include automobiles, sporting goods, appliances, jewelry, and other categories. [4]

<sup>5</sup> Mass balance systems allow the mixing of certified and uncertified materials with checks and balances in place to ensure the volume of certified product entering the supply chain is consistent with the amount claimed. Book and Claim systems use credits for certified material produced. In this system, no physical link between the certified content and the end product is maintained. [8]

reasonable and public timeframe within which the company will move toward measurable biobased content from segregated supply is an important consideration.

## References

- [1] International Standardization Organization, "ISO 14021:1999(en), Environmental labels and declarations — Self-declared environmental claims (Type II environmental labelling)," 1999.
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- [3] E. Simon and A. Grabowski, "Methodology for the Assessment of Bioplastic Feedstocks," 2014.
- [4] Investopedia, "Durables Definition | Investopedia." [Online]. Available: <http://www.investopedia.com/terms/d/durables.asp>.
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- [6] United States Department of Agriculture, "BioPreferred Voluntary Labeling Initiative." [Online]. Available: <http://www.biopreferred.gov/BioPreferred/faces/Welcome.xhtml>. [Accessed: 21-Jan-2015].
- [7] European Bioplastics, "Biobased label." [Online]. Available: <http://en.european-bioplastics.org/standards/labelling/bio-based-label/>. [Accessed: 21-Jan-2015].
- [8] "Making sense of chain of custody | ISEAL Alliance." [Online]. Available: <http://www.isealalliance.org/online-community/blogs/making-sense-of-chain-of-custody>.