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To Whom It May Concern

**Re: Proposal for a French Law Against Oxo-Biodegradable Plastics**

The French National Assembly proposed law to ban oxo-biodegradable plastics shows evidence that they have been alarmingly misinformed about oxo-biodegradable plastic (OBP) technology. Indeed, their proposal to ban OBP represents a disgraceful triumph for a disingenuous propaganda campaign featuring baseless conjecture led by the bioplastics industry over objective scientific evidence.

EPI categorically refutes the key assumption about oxo-biodegradable plastics made by members of the French National Assembly in formulating their directive:

““Oxo-biodegradable” plastics do not biodegrade in the natural environment, but only fragment into secondary microplastics. It is thus misleading to refer to such materials as “biodegradable”. Fragmentation converts visible littering into invisible littering.”

The degradation products of OBPs are completely transformed into a form that is assimilated by naturally occurring microorganisms. Therefore, OBPs are ultimately converted into water and carbon dioxide that re-enter the natural carbon cycle. A substantial body of high-quality, peer-reviewed scientific research has accumulated in support of this incontrovertible fact. Recently, for example, Jakubowicz et al. observed 91% biodegradation in a soil environment within 24 months (Jakubowicz, Yarahmadi and Arthurson).

It is entirely untrue that the end-products of oxo-biodegradable plastics are fragments of secondary microplastics, as fragmentation merely represents the first step in oxo-biodegradation. The literature supporting OBP technology is without controversy and recognized by international standards bodies. Oxo-biodegradable plastic additives, such as EPI's TDPA™, which conform to BS8472 (UK), ASTM D6954 (USA) and AFNOR Accord T51-808 (France), are consequently, products of high integrity.

EPI additives do not contain heavy metals, and the salts contained within it are at such low concentrations that they are unlikely to be toxic to the environment. This is confirmed by the UK government [DEFRA Oxo-degradable plastics Q and A (Revised 31/10/2013) Question 8]. Furthermore, EPI's OBP is subjected to the same environmental safety standards (EN13432) and eco-toxicity tests used to regulate compostable plastics. Besides, OBPs have been used in agricultural mulch film for many years, with no incidence of bio-toxicity or reduced soil fertility. Thus, neither oxo-biodegradable additives nor their degradation products cause any toxicity.

With regard to recyclability, numerous studies, including the independent study commissioned by RECYC-QUEBEC, Canada (CRIQ No.: 640-PE35461) had verified that oxo-biodegradable plastics are recyclable and are compatible with the post consumer plastic waste recycling stream.

It is clear that oxo-biodegradable plastic technology is the victim of misrepresentation. It would be most imprudent if the French government ignores the scientific evidence of oxo-biodegradable plastics and act prejudicially by allowing the unfounded rhetoric of the French National Assembly to pass into law.

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