INDA Position Statement on Plastics

10/27/20

The Association of the Nonwoven Fabrics Industry (INDA) shares the growing concerns that plastics should not be disposed as litter in natural environments like oceans, rivers, and lands. The nonwovens industry uses fibers made of plastics (among other raw materials) to produce many of the materials incorporated in end-products for consumers. Disposable wipes, absorbent hygiene products (baby diapers, incontinence products, feminine hygiene products) and indoor air filters are three product categories that are among the largest users of nonwoven materials. Our wipes and hygiene products address real-life personal needs and increase the quality of life for babies, women, families, the elderly, and others.

While the nonwovens industry is a relatively small consumer of global plastics, we are nevertheless committed to engaging in a constructive manner to enhancing the sustainability of our plastic-containing products and packaging. We have a strong baseline of active programs for plastic source reduction, recycling, and introducing more environmentally compatible nonwovens, and are committed to advancing the principles of the circular economy.

The plastics issue is multi-faceted and complex. In addressing it, we believe it is important to use precise terminology in policy making to avoid penalizing usage and development of more appropriate materials that address the real issues of persistence in the environment, fossil fuel usage and the need to support circular principles. Our goal is to advance a principles-based understanding of material properties and the use of accepted material standards and guidelines to determine a material's sourcing desirability and its propensity to biodegrade in its intended end-of-life environment. Such an approach should encourage the inclusion of environmentally friendly inputs, like bio-based materials or renewable resources whenever they deliver a reduced impact, are responsibly sourced, and are economically viable.

In legislation needing to create a regulatory "plastics" definition, we suggest a definition that allows for items that demonstrate material characteristics, such as desirable sourcing or end-of-life performance, to potentially be exempt from legislative remedies. We suggest the following approach to defining "plastic" and its applicability to legislative proposals:

Definition of "Plastic":

The European Union Single Use Plastics Directive contains a definition of "plastic" that is quite complex, heavily reliant on chemical terms, and is materially prescriptive rather than performance based. As it is emerging, there are some materials with advantageous sourcing (with associated Life-Cycle benefits) and/or end-of-life behaviors that will be defined as "plastic" and therefore subjected to penalizing remedies. Our view is to focus on the desired performance of materials, regardless of the chemistry, as material science and innovation can deliver desired performance from a variety of chemistries regardless of their classification.

"Plastic" as we see it is defined as a group of materials that consist of high molecular weight polymers from a variety of sources that are solid at room temperature and soften as heat is applied. These polymers can be derived from organic, synthetic, natural or processed materials.

A single-use plastic product is one that is either designed to be used for only a short period of time before being discarded, recovered or recycled, or one that is likely to be used in this way.

Applicability to Plastics legislation:

Plastics come from a variety of sources with a myriad of different performance characteristics, and because of that, it is our view that legislative intent should not subject to remedies and/or refinement any material that is responsibly sourced (with an improved environmental footprint) or has responsible end-of-life performance, or meaningfully supports the principles of a circular economy.

This would include materials that are naturally sourced, or consist of synthetically-derived polymers with no additives or chemical modifications to their structure that prevent them from biodegrading in their intended disposal environment at a rate similar to natural analogues, or materials that are responsibly sourced and/or have a responsible end-of-life performance, per the specified performance criteria below:

Responsibly Sourced Plastics:

Plastics that are responsibly sourced are:

A. Made primarily of bio-based renewable materials made from feedstocks adhering to the principles of regenerative and sustainable agriculture as certified by an internationally recognized third party (for example, PEFC, FSC, RSB, ISCC or Bonsucro) that have an improved environmental footprint, or

B. Consist of a significant percentage of recovered/recycled materials (per SCS 7.0) diverted from the waste stream and returned to use in the form of raw materials or products, thus advancing circularity.

Responsible End-of-Life Plastics:

Plastics with a responsible end-of-life performance are materials that are non-toxic and either:

A. Recyclable, or

B. Biodegradable so as to not be persistent in their intended non-landfill end-of-life environment, consistent with the FTC Green Guides 16 C.F.R. @ 260.8(c).

The following test methods can be used to determine a materials' biodegradability by intended disposal environment:

- Composting: ASTM 6400
- Flushing/Wastewater Treatment: FG505 and FG506 of INDA/EDANA GD4, or OECD 301B

We believe that material science, processing advancements, and infrastructure development will play a major role in reducing the amount of plastic being inappropriately disposed. We must also continue to find the appropriate balance between the benefits provided by such materials, alternatives that can deliver on consumer expectations, and the environmental costs of their use and disposal.