

**Question for written answer E-002779/2021  
to the Commission**

Rule 138

**Pascal Arimont (PPE), Tom Vandenkendelaere (PPE)**

**Subject:** Inconsistent interpretation of 'not chemically modified natural polymer' in Directive (EU) 2019/904

The Commission is beginning the final discussions on guidelines under Directive (EU) 2019/904 (Single Use Plastics Directive). This Directive promotes circular approaches for sustainable and non-toxic re-usable products and re-use systems, aiming to reduce the quantity of waste generated<sup>1</sup>. In order to achieve this objective, clear and unambiguous interpretations of the legislation are needed. However, the interpretation of 'not-chemically modified natural polymer' in the draft guidelines could be considered inconsistent, despite the added value of such polymers for the broader construction sector.

1. Why does the Commission's interpretation of 'not chemically modified' in its draft guidelines focus only on the difference between ingoing and resulting polymers? This disregards any modifications that might have taken place during the production process, even though the Commission concludes that polymers produced by fermentation are not natural polymers when considering the production process for 'natural polymers'.
2. Why do the Commission's guidelines currently go beyond European Chemicals Agency (ECHA) guidance without specific reason by rejecting that polymers obtained by micro-organism fermentation are natural polymers, while the ECHA considers natural polymers to be polymers that are the result of a polymerisation process that has taken place in nature independently of the extraction process?

---

<sup>1</sup> Directive (EU) 2019/904, recital 2.