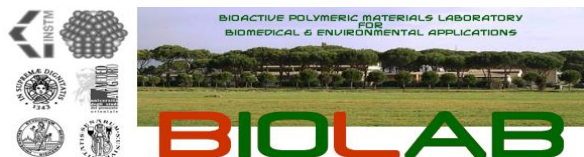




UNIVERSITÀ DI PISA



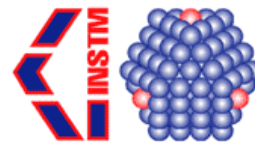
LABORATORIO MATERIALI POLIMERICI BIOATTIVI PER
APPLICAZIONI BIOMEDICHE ED AMBIENTALI

Dipartimento di Chimica e Chimica Industriale

Via Vecchia Livornese 1291 - 56010 San Piero a Grado (Pisa) (Italy)

Tel: +39 050 2210302-3 / Fax: +39 050 2210332

Cod. Fisc. 80003670504 - P. IVA 0028682 050 1



Prof. Emo CHIELLINI

Tel: +39 050-2210301/2/3/5

Fax: +39 050-2210332

E-mail: emochie@dcci.unipi.it

Ms. Jessica L. Rich,
Bureau of Consumer Protection
Federal Trade Commission,
600 Pennsylvania Avenue, NW
Washington, DC 20580

Pisa, August 9th, 2013

Dear Madam,

It has come to our attention that there are a growing number of companies marketing additives which are claimed to cause the biodegradation of plastics, not by a process of oxo-biodegradation, but by a process involving enzymes or "micro-biodegradable additives."

In my opinion these claims are likely to mislead the public, for the reasons explained at

<http://www.biodeg.org/files/uploaded/biodeg/OPA%20ENZYMATIC%20ADDITIVES%205%20August%202013.pdf> with which I agree. I consider that they need to be investigated.

We have analyzed in our laboratories shopping bags declared to contain ECM and Enzymoplast additives and marketed as "compostable". Neither of these shopping bags passed even the disintegration test expected to be passed by compostable plastic items according to UNI-EN 14995

The relevant companies in the USA are:

USA

- Green Club: <http://www.greenclubinc.com/main.html>
- ENSO Plastics: <http://www.ensoplastics.com/index.html>
- Bio Sphere: <http://www.biosphereplastic.com/>
- Earth Nurture Europe: <http://www.ena-eu.com/>
- ECM Plastics: <http://www.ecmbiofilms.com/>
- Earth Nurture Additive: <http://biogreenproducts.biz/>
- New Encore: http://www.commandpackaging.com/Env_Bio.asp
- EcoLogic (Eco-One additive): <http://www.ecologic-llc.com/>
- EcoPure <http://www.goecopure.com/EcoPure/EcoPure.html>
and Biotec <http://www.bio-tec.com/>
- Pure Plastics (Eco Pure Additive) <http://pureplastics.biz/>
- MHI <http://www.pr.com/press-release/106801> <http://www.packworld.com/trends-and-issues/global/good-earth-packaging-fact-good-earth> <http://www.prlog.org/10119672-mhi-introduces-good-earthtm-packaging-produced-100-from-recycled-plastic-bottles.html>
<http://www.cpcpkg.com/dir/co/312/31273.html>

Emo Chiellini
Professor