
Position Paper on the European Commission's Strategy on Plastics

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Reloop is a platform that brings together industry, government, and non-governmental organisations to form a network for advances in policy that create enabling system conditions for circularity across the European economy.

Reloop welcomes the European Commission's Strategy on Plastics adopted on 16 January 2018. This position paper aims to contribute to the European Parliament and Council discussions on the Plastics Strategy in order to develop an ambitious Strategy that will help achieve a real circular economy of plastics and reduce its negative impacts on the environment.

1. Recycled Content Mandates

Reloop welcomes the pledging exercise introduced in the Plastics Strategy, but we believe that legislative measures are also needed to achieve the goal of sustained use of recycled plastics. Mandating minimum content in products offers the producers of those products a level playing field to do business, especially during times when virgin resin is less expensive than recycled resin. Reloop is of the view that a progressive outlook and legal certainty would be beneficial for all Member States, providing new economic opportunities and creating jobs. This is particularly true as China has banned imports of 24 categories of solid waste (including several plastic resins such as PET, PE, PVC, PS) since the end of 2017. This demands that the EU creates a new market for its waste plastics and that market can only be established for quality materials.

Setting minimum requirements in packaging and other applications will improve the use of recycled content in plastic products. This is the best way to radically reduce climate emissions and improve resource efficiency, while at the same time carving out a future proof role for European enterprises. Reloop furthermore proposes to include wording on recycled content in the provision on essential requirements under Article 9 of the Packaging and Packaging Waste Directive, in the upcoming legislative proposal on single use plastics which is expected in May 2018 and in other EU acts such as the Construction Products Regulation and the End-of-life Vehicles Directive.

The primary reason for recycling is to limit the energy used and pollution produced during the primary resource extraction phase (the "upstream" phase) of making plastics. Reloop marks a clear distinction between downcycling and closed-loop recycling. Downcycling into products that are not going to be recirculated offers environmental benefit only one time. Closed-loop recycling, which converts used plastic into new plastic products of the same quality and can subsequently be recycled again and again, offers a multiplier effect to the benefits. Given the magnitude of these climate change benefits, we believe that where possible closed-loop recycling should always be the priority choice within both voluntary and regulatory initiatives.

2. High and New Targets on Prevention, Reuse and Recycling

Reloop supports high recycling targets for plastics and other materials, since this is the only way investments in improving waste management systems will be made and progress towards a real

circular economy will be achieved. In this regard, Reloop welcomes the increased recycling targets introduced in the revised Waste Framework Directive and the Packaging and Packaging Waste Directive. At the same time, we believe that recycling targets should be expanded to include also non-packaging items made out of plastics as well as other materials. Furthermore, end-of-life residual material should be sorted out for recycling prior to incineration and landfill and officially integrated into national recycling targets of Member States.

In addition to recycling targets, Reloop supports the development of reuse and waste prevention targets for both packaging and non-packaging materials, as prevention and reuse should be prioritised over other waste management options further down the waste hierarchy.

3. Promotion of Deposit-Return Schemes for Beverage Packaging and Other Items as a Key Measure to Encourage Reuse and Waste Prevention and Address Marine Litter

Marine litter is one of the biggest challenges Europe and the world is facing and there are still low hanging fruits to help address this problem. The EU has already started to lead the way by introducing measures on plastic bags. Due to the urgency of the marine litter problem, Reloop now calls on the EU to move forward and address the other sources of marine litter.

Beverage containers are both by weight and volume the most problematic packaging item in marine litter, aside from plastic bags. Reloop therefore recommends the promotion of deposit-return systems on beverage containers, which can achieve return rates of more than 90% and play a key role in ensuring a sufficient supply of high-quality feedstock for re-processors. The implementation of deposit-return schemes was also encouraged by the G20 leaders at a recent Summit in Hamburg¹, as well as by the EPA Network and UNEP.

In addition to beverage packaging, deposit-return schemes can also be used for other items, such as fishing nets, coffee cups, batteries and electronic products.

4. Promotion of Eco-Design

Reloop supports the widening of the scope of the EU eco-design legislation, which currently focuses on energy efficiency, to include also broader aspects such as those of reusability, reparability and recyclability. We support the actions announced in the Commission's Plastics Strategy to improve product design, in particular revising the Packaging and Packaging Waste Directive and developing requirements to support the recyclability of plastics.

5. Differentiation of Fees in the Extended Producer Responsibility (EPR) Schemes

Reloop supports the new Article 8a of the Waste Framework Directive on minimum requirements for EPR. In this regard, Reloop also welcomes the upcoming Commission's guidance on eco-modulation of EPR fees, which should encourage differentiation of EPR fees to support recyclability and recycled content.

¹ <http://www.mofa.go.jp/mofaj/files/000272290.pdf>

6. Phasing Out Microbeads

Plastic waste, including microplastics, is a huge challenge for our seas and oceans, damaging marine wildlife and ecosystems. As our oceans are increasingly filled with plastics, it also has a negative impact on human food resources and associated jobs. Recent studies have found plastic particles in both tap water and bottled water, showing the gravity of the problem. Reloop welcomes the actions proposed in the Plastics Strategy. In particular, we support developing EU-wide restrictions/bans on addition of microplastics to products such as cosmetics and detergents as well as EPR for unintentional microplastics release.

7. Developing a Framework for Biodegradable and Compostable Plastics, Banning Oxo-Degradable Plastics

Reloop welcomes the Commission's actions announced in the Plastics Strategy to develop harmonised rules on defining and labeling compostable and biodegradable plastics. Reloop also welcomes the Commission's efforts to restrict/ban the use of oxo-degradable plastics as it is not biodegradable, cannot be recycled in conventional plastic streams and is misleading to consumers.

8. EU Support for the Development of Advanced Sorting and Recycling Technologies

The technologies for sorting and recycling are already very advanced, however many countries lack knowledge and resources to be able to adopt them. Reloop therefore calls for increased EU support through its various funding streams, including Horizon 2020 and cohesion funding, in order to help Member States adopt advanced sorting and recycling technologies to support the recycling value chain.

In addition, Reloop supports the creation of an investment fund announced in the Plastics Strategy to finance investments in innovative solutions and new technologies aiming to reduce the environmental impacts of primary plastic production.

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