

Position Paper on the European Commission's proposal for a Directive on the reduction of the impact of certain plastic products on the environment (COM(2018)340)

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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 legislative proposal on single-use plastics published on 28 May 2018 (COM(2018)340), which shows great ambition, commitment and leadership from the EU in addressing one of the major global challenges of today, namely marine litter. This position paper aims to contribute to the European Parliament and Council discussions on the legislative proposal in order to develop an ambitious new directive that will help achieve a real circular economy of single-use plastics and reduce its negative impacts on the environment.

1. Recycled Content Mandates

Reloop welcomes the pledging exercise introduced in the EU 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.

The new legislative proposal on single-use plastics is a great opportunity to start mandating recycled content EU-wide. The draft Directive should call on the European Commission to provide an assessment in consultation with the recycling industry to determine the adequate percentage of minimum recycled content. Reloop proposes to start by focusing on PET beverage containers as a first step. The recycled content mandates would also support and complement the 90% collection target for beverage containers introduced in Article 9 of the legislative proposal, by providing pull mechanisms on the minimum recycled content.

For more information about recycled content mandates, please see Reloop's paper on "Closing the Circular Economy Loop: A Call for EU Action on Recycled Content Mandates," available here: <https://reloopplatform.eu/wp-content/uploads/2018/07/Coalition-call-to-action-MRC-final-July-19.pdf>

2. High Targets on Collection *and* Recycling of Beverage Bottles

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.

ReLoop welcomes the new Article 9 of the legislative proposal on single-use plastics, which would require Member States to achieve a 90% collection rate for single-use plastic beverage bottles by 2025. This would show great leadership by the EU in addressing one of the biggest sources of marine litter, plastic beverage bottles, and is very much in line with the EU's approach used for plastic bags, which has proven to be a great success.

ReLoop would like to stress that in addition to collection, this target should include also recycling in order to make sure that what is collected is actually recycled, in line with the EU waste hierarchy.

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

ReLoop supports the establishment of deposit-refund schemes for single-use plastic beverage bottles supported in the new Article 9 of the legislative proposal on single-use plastics.

Beverage bottles are both by weight and volume the most problematic packaging item in marine litter, aside from plastic bags. Deposit-refund schemes on beverage bottles have been found to achieve very high return rates of more than 90% and play a key role in ensuring a sufficient supply of high-quality feedstock for re-processors.

Deposit-refund schemes can significantly contribute to waste reduction and help achieve high reuse and recycling targets while at the same time reduce the marine litter problem. This has been demonstrated in countries with a deposit system, such as Germany, Sweden, Denmark, Finland, Estonia, Lithuania and the Netherlands. Furthermore, several other EU Member States are currently looking into introducing deposit, for example France, Scotland, England and Malta. In addition, some of the world's biggest economies are considering it, including China; the Indian state of Maharashtra has already established it with endorsement by the Head of UN Environment Erik Solheim.

The implementation of deposit-refund schemes was also encouraged by the G20 leaders at the Summit in Hamburg¹, as well as by the EPA Network and UN Environment.

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

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