
Position Paper on the proposal for a directive on the reduction of the impact of certain plastic products on the environment

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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.

With this paper, Reloop would like to contribute to the triologue discussions by highlighting below some of the key issues which we believe are crucial for establishing an ambitious new directive that will help achieve a real circular economy of single-use plastics and reduce its negative impacts on the environment. This new directive is a historic opportunity for the EU to show its global leadership in addressing one of the biggest challenges of today, namely the plastic and marine litter problem. We would therefore like to call on the EU policy-makers to maintain a high level of ambition in the directive, and we hope that this paper can be useful in your discussions moving forward.

1) Recycled content mandates

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. A progressive outlook and legal certainty will thus be beneficial for all Member States, providing new economic opportunities and creating jobs and growth. 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.

We therefore very much support the European Parliament's proposal for a 35% mandatory recycled content for beverage bottles by 2025, as introduced in its amendment 56. This target is a natural first step for setting mandatory content requirements and is complementary to the 90% collection target by 2025 set in Article 9. In fact, it supports the high target for collection, by providing the demand for the new supply. For example in Norway, according to the Norwegian deposit-return system operator, Infinitum, they are collecting 87% of PET bottles today and as such, have the ability to supply resin for 80% recycled content to the brand owners in Norway that use PET.

For more information, please see Reloop's paper on "Closing the Circular Economy Loop: A Call for EU Action on Recycled Content Mandates", which was co-signed by more than 30 stakeholders, including industry, NGOs, trade associations and local authorities:

<https://reloopplatform.eu/wp-content/uploads/2018/07/Coalition-call-to-action-MRC-final-July-19.pdf>

2) 90% collection *and* recycling target for beverage bottles by 2025

Reloop fully supports the Parliament's proposal related to Article 9, which includes a 90% collection *and* recycling target of beverage bottles by 2025.

We believe it is of crucial importance to keep the target high at 90% by 2025, as this is the only way to initiate immediate systemic change to mitigate the marine plastic litter problem and prevent plastic bottles from ending up on our beaches. Setting high targets sooner (by 2025), rather than later (by 2030), also offers new investment opportunities, now, at a time when the European recycling industry needs some financial certainty. The Council's proposed amendment of 75% by 2025, and 90% by 2030, is simply not enough to achieve timely change, at the national level. The 90% target will show great leadership by the EU in addressing one of the biggest sources of marine litter, plastic beverage bottles, and is also very much in line with the EU's approach used for plastic bags, which has proven to be a great success.

Furthermore, we believe it is important to add to this collection target also recycling (as proposed by the Parliament in amendment 66 adding the wording "and ensure their subsequent recycling"), in order to make sure that what is collected is actually recycled, in line with the EU waste hierarchy.

The 90% target is feasible and achievable. 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. As an example, Lithuania has achieved 92% collection rate in only 2 years after the introduction of a deposit scheme. Furthermore, deposit schemes are also a key measure to encourage waste prevention, reuse and address the marine litter issue, which is the aim of the Directive. The implementation of deposit-refund schemes was also encouraged by the G20 leaders at the Summit in Hamburg, as well as by the EPA Network, UN Environment and others.

Reloop also welcomes the Parliament's amendment 68, which would require the European Commission to develop guidelines, in consultation with Member States, on the functioning of deposit-return schemes.

Furthermore, Reloop supports the Parliament's amendment 90 to include caps and lids in the definition of 'beverage bottles' under part F of the Annex. This is important to tackle the marine litter problem in a comprehensive and holistic way as caps and lids are one of the most often found item on Europe's beaches.

3) Expanded list of banned products under Article 5 to include oxo-degradable plastic and expanded polystyrene

Reloop supports the Parliament's amendments 83 and 84 to include under market restrictions in Article 5 some of the most problematic items such as products made of oxo-degradable plastic and food and beverage containers made of expanded polystyrene. This is in line with Ellen MacArthur Foundation's New Plastics Economy Initiative's statement calling for a ban on oxo-degradable plastic packaging.

We also support the Council's inclusion of expanded polystyrene cups for beverages to the list of banned products. Alternatives exist today to expanded polystyrene (EPS), which are environmentally friendlier. Furthermore, even though EPS is technically recyclable, it is far too expensive to make economic sense, which is why very few municipalities ever collect and recycle it. In fact, many jurisdictions have already banned it. In addition, EPS is very lightweight causing it to blow into the sea and contribute to the marine litter problem.

4) End-of-life costs under EPR in Article 8

Reloop supports Article 8 and getting producers (and by extension their consumers) to play their part in solving the marine litter problem and fully pay for the end-of-life costs, including litter cleanup. This provides internalisation of costs and is part of smart policy, providing an economic incentive for both producers and consumers to choose the less environmentally damaging products and packaging.

5) EPR for fishing gear under Article 8

Reloop supports the Parliament's amendment 64, which would set a collection and recycling rate for fishing gear, an important part of the marine litter problem.

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