

# **Your Voice In Europe: ROADMAP feedback for Communication: Strategy on Plastic in a Circular Economy (including action on marine litter)**

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## **Related document: Communication: Strategy on Plastic in a Circular Economy (including action on marine litter)**

### **Feedback:**

*As a company devoted to plastic films converting, (agricultural and industrial polythene films) we are concious of the importance to support the creation of a Circular Economy where waste is converted into a resource.*

*In order to promote a better Circ. Economy, we need the creation of National Collecting schemes for each type of generated waste.*

*In that sense, there are several ideas that we would like to point out:*

- a) We prefer to avoid any regulation and taxes.*
- b) We prefer also that the industry through voluntary schemes shall develop national collecting systems for used plastics.*
- c) Understanding the Extended Producer Responsibility as shared responsibilities among all economic actors: producers, distributors, end users (customers, farmers, etc.) and public institutions. (This responsibility is not only of producers or converters as we see very often on the media).*
- d) The industry aims to cooperate on the development of efficient national collecting schemes not only in our own country but as well in other countries where we supply our products.*
- e) A major obstacle to extend the creation of used plastics's voluntary collecting schemes is the fact that not all market players want to join these initiatives. Therefore, it becomes very difficult to persude all companies to be part of these systems. The existence of "free riders" has always been a major obstacle due to the fact that they create distortions on the competition by the fact of being free of responsibilities. At the end they put at risk the future of these schemes.*

*f) Therefore, we want to get cooperation with the Administration and Government bodies (at European, national and local level) to support healthy environmental initiatives made by the private sector.*

*g) We believe to increase mechanical recycling in Europe, but also in some cases, when recycling is not economically sound, to mix it with energy recovery.*

*h) We have to support from the very beginning non-bureaucratic or too costly models. All progress shall be quite transparent, with adequate monitoring and linked to efficiency ratios to justify any cost increase.*

*i) Any collection system targets shall be progressive, setting up realistic, reasonable and attainable recycling goals.*

*j) A very important issue is that we defend the attainment of win-win agreements with all parties involved, at all times.*

*Which means that the only way that voluntary collecting schemes can work is by assuring that no local producers or converters or recyclers take one-sided economic advantages from the schemes. This is happening very often and is creating major obstacles for the progression towards a circular economy. There are some initiatives that have been made to improve collection and recycling of wastes, trying to persuade others to join but they are far from being neutral in terms to guarantee free competition among stakeholders. For private companies it is not possible to support initiatives that create distortions on competition.*

*Therefore, it must be taken into account that establishing a neutral ground among players where nobody is going to enjoy one sided economic benefits out of the project, from the start is a fundamental requirement before initiating any plan.*

*We agree on the need to have a coordinated approach among majors players and institutions in order to reach consistent decisions but always making sure that free competition is guaranteed from the start of the project design process.*

**Feedback file:**