

# **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:**

*1. Promotion of SRMs to make them competition-fit (internalization of external costs) by stimulating all steps across the entire value chain:*

- *pull measures;*
  - o reduced/lower VAT on second hand goods and products with recycled content;*
  - o minimum recycled content requirements for selected products*
  - o minimum green public procurement requirements at EU level to boost purchase of recycled products and materials*
  - o one very important EU initiative is the Renewable Energy Directive that includes waste-based fossil fuels in the minimum share in the transport sector – the Commission should propose similar incentives for SRMs so they become the preferred choice and can compete with the virgin materials on the market*
  - o the Commission should look into the different possibilities to create a market by setting targets and introducing market incentives for increased use of SRMs; one step could be to introduce it in the EPR schemes, and give those companies benefits that use SRMs (eco-modulation)*
  - o we need incentives by reducing carbon taxes if using recycled content (to combat a number of problems: very low oil prices to produce virgin plastics; the economic and environmental advantages of SRMs are not always reflected in current prices; in some respects, such as homogeneity, SRMs are at a disadvantage to primary raw materials; recyclers face challenges relating to the application of the REACH Regulation; need for approval by the authorities of the use of recycled plastics)*
- *End-of-waste: need for a common EU methodology and mutual recognition procedure*
- *improving separate collection and sorting;*
- *we need to reach high recycling levels and high quality materials – today most of the debate*

*is how to collect as much as possible*

**2. Eco-design:**

- *standard or guidelines for recyclability of plastics, e. g.:*  
<http://www.recoup.org/p/130/recyclability-by-design>;
- *A high percentage of plastics is hard to recycle for many reasons, e.g. mixed polymers, contamination but especially black in colour (black plastics should be completely eliminated as alternative colours such as green and blue are in use already today; this could be done by introducing possible price increases/surcharges/levies for those who continue producing non-recyclable plastics where alternatives exist);*
- *Better dialogue between all actors (manufacturers, recyclers) across the value chain;*
- *not mixing too many plastic materials*

**3. Better consumer awareness:**

- *eco-labelling rules to incorporate indications of recycled content and recyclability*
- *this is an area for abuse as many products on the market have been labelled as recyclable but in fact they are not*

**4. Hazardous substances:**

- *address the issue of REACH authorization (the issue of 'legacy substances' needs to be taken into consideration; it should be decided on a case-by-case basis whether it is more adequate to substitute problematic substances to recycling or to incinerate those wastes);*

**5. Biodegradable, oxo-degradable and bio-based plastics:**

- *bio-degradable plastics may affect bio-waste treatment as well as the recycling of other plastics;*
- *biodegradable can have a negative impact on littering*

**6. The complementary role of waste to energy for non-recyclable plastics:**

- *for plastics that cannot be recycled but incinerated, they should preferably be used to reduce GHG emissions and as far as possible replace fossil fuels, e.g. in the cement industry;*
- *production of SRF: the issue of non-recyclable plastics has to be tackled in a realistic way, with the view that waste-to-energy is a valuable solution; promotion tools/pull measures to be part of the Strategy (tariffs for heat/electricity, priority access to the grid/DHC networks, taxation, public support to investment etc.)*

**Feedback file:**