

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:

I welcome the initiative to address the serious problems arising from the ubiquitous application of plastics.

However, there are some key issues missing and not fully addressed which are necessary to include in order to drastically reduce the prevalence and pollution of plastic in global societies and the environment.

The plastics strategy needs to emphasise far more the prevention and detoxification of plastics, before recycling or novel materials.

Single-use plastics are one of the key causes for the considerable plastic pollution of the aquatic environment and must become obsolete, as clear alternatives exist. Littering is not only a marine problem, but exists in most rivers, lakes, dams, streams, roadsides, etc. The Plastics strategy should look first and foremost for solutions in the topmost levels of the waste management hierarchy, starting from prevention and reuse. For example, a significant extension of the geographical scope and range of packaging products covered by deposit schemes, ought to be seriously considered as a strategy to collect back very clean materials for high-quality recycling in the case of single-used plastic packaging, or to incentivise the substitution of plastics with more durable and reusable/refillable materials such as glass. Prevention and reuse should be more clearly linked to producer responsibility, targeting littering, but going beyond it to create incentives for packaging/article producers to remove toxics from the plastics stream and design for durability and safe prolonged use. Producers are indispensable to drive change in consumer behaviour (choice editing), and that this mandate must come from strong EU and national government action and internalisation of the costs in price setting, including more comprehensive extended producer responsibility schemes that not just tackle littering but going beyond it in terms of driving better product design and incentivising reuse and repair.

Microfibers are an important source of microplastic pollution, together with cosmetic products and both should be tackled decisively and quickly.

The plastics strategy should prioritise plastic prevention and overall reduction: substantially reduce the use of excessive, unnecessary and throwaway plastics by systematically directing

all relevant policies towards waste prevention and the reduction on overall plastic use, including developing reduction targets, phasing out single-use items and disincentivising the use of non-durable plastics, independent of their feedstock or biodegradability claims. Nano materials in packaging are a new and potentially problematic area which require more research and must be acknowledged as a potential issue.

A key criteria for bioplastics should be to design them to be compatible with composting/recycling schemes and to avoid dangerous substances.

The roadmap is not setting a clear enough vision that the future of plastic materials should rely on recycled plastics as the main feedstock for new applications with associated consequences in terms of material innovation, business models and product design for prevention and recycling, recycling technologies and radical de-toxification. Supporting research and developments and scaling up good experiences should also be made more prominent.

It is vital the EU openly supports an absolute reduction in plastic consumption as a solution, and puts clear policies for this in place.

The Roadmap does not sufficiently address the potential issues around oil price fluctuations and the reduction in oil for energy usage on the virgin plastics market and on climate change and related social and environmental impacts (with continued oil extraction).

Feedback file: