

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:

The Danish Ecological Council fully supports a plastic strategy and applaud the three focus points in this roadmap. 1) reducing our dependency on virgin fossil fuel and related CO2 emissions, 2) remediate the low rate of recycling and reuse, 3) addressing the significant leakages of plastics to the environment.

However we find the lack of clear operational directions and specific instruments/approaches to fulfil them as a major weak point for the Roadmap to achieved its goals.

On prevention: Prevention should also be prioritized when it comes to avoidance of harmful virgin or recycled materials to be placed on the market, being for their toxicity on human health and the environment or their pollution impact in the seas (e.g micro-fibers). The roadmap does not address the prevention of plastic usages which are unnecessary such as excessive packaging, plastics in personal care products (for elaboration of this topic see attached policy paper) and disposable plastic items e.g single use plastic cutlery. And hence the roadmap does not outline the problematic scale of plastic usage. We wish to see the aspects of prevention and reuse linked closely to producer responsibility, targeting littering and excessive packeging and beyond.

On producer responsibility: The roadmap emphasis should be on EPR schemes (Extended Producer Responsibility) as well as demands on better designs to reduce plastic use in production and marketing of goods.

On recycling: 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.

On alternative feedstock: The Roadmap needs to address the confusion on bioplastics, whether it is bio-based plastics or biodegradable plastics

Development of biodegradable plastic should be channeled towards the most relevant applications. The conditions and criteria for assessing their sustainability needs to be set and avoiding the misconception by end users that bioplastic could be paid less attention to due to their biomass origin needs to be addressed.

Generally, the roadmap also misses the importance of new messages and nudging towards end users to change today's consumption patterns.

Feedback file:

[*polycymicroplastic_signed.pdf*](#)