

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

User's data:

- Domain : Non governmental organisation
- Name : Sarah Baulch
- Email : sarahbaulch@eia-international.org
- Country : United Kingdom
- Organisation : Environmental Investigation Agency (EIA)
- Headquarter : select
- Register : 03960197927-62
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Related document: Communication: Strategy on Plastic in a Circular Economy (including action on marine litter)

Feedback:

The Environmental Investigation Agency (EIA) welcomes the establishment of a Strategy on Plastics in the Circular Economy. Plastics represent an ever-growing legacy of pollution from multiple sources and pose a major threat to marine biodiversity. There is a clear environmental, economic and ethical imperative for transformative action to be taken to reduce sources of plastic pollution to the marine environment. Our comments are summarised below under each of the three main proposed aims of the strategy.

(1) High Dependence on Virgin Fossil Feedstock

The most effective way to reduce dependence on virgin fossil feedstock for plastic production is through measures to prevent plastic use, in particular single-use plastic items and packaging. Bans and other measures should be considered for specific single-use plastic items found in the marine environment, e.g. disposable cutlery and straws, plastic cotton swabs and others, in tandem with measures to prevent excessive packaging.

Measures requiring minimum recycled content for certain products, as done in California for rigid plastic packaging containers, should be explored to limit dependence on virgin fossil feedstock, while also boosting demand for recycled plastics.

(2) Low Rate of Recycling and Reuse of Plastics

There are several policy levers that could be used to improve the economics of recycling, including: (1) establishing a target for minimum recycled content to boost demand for recyclates; and (2) eco-design and extended producer responsibility measures that improve recyclability and enhance economies of scale. Mandatory requirements for packaging should be established that ensure design for reuse and recycling, including restriction of polymer

types and use of coloured plastics.

In a recent analysis, the Ellen MacArthur Foundation estimates that 30% of plastic packaging will never be reused or recycled without fundamental redesign and innovation – highlighting multilayer and small format packaging, PVC, polystyrene and expanded polystyrene as priorities; for 20% reuse provides an economically attractive opportunity – both in the business to business (e.g. reusable transport packaging) and business to consumer sector (e.g. refillable systems in the cleaning and personal care market, refillable beverage containers); and for the remaining 50%, recycling would be economic provided there are efforts on design and after-use systems.

Deposit-return schemes (DRS) provide a vital tool to reduce littering and increase collection for reuse or recycling and should be a key focus of the strategy. Studies from around the world have shown that DRS increase high quality recycling and lead to a reduction in litter overall. The introduction of DRS for single use beverage containers caused recycling rates to increase to above 80% in the countries and regions where they operate and to over 95% in Germany, the Netherlands and Norway. A 2005 study found that a DRS could reduce littering of plastic bottles by more than 80% in the UK. Studies have shown that far from losing revenue due to reduced material stream collections, DRS can actually save Local Authorities money through reduced operating costs and logistics, as well as reducing greenhouse gas emissions, as a significant percentage of low density, bulky material no longer needs to be collected at the kerbside.

(3) Significant Leakage of Plastics into the Environment

A life-cycle approach should be taken to reduce plastic leakage into the environment, from eliminating loss of pre-production pellets through to preventing plastic waste generation, increasing reuse and recycling, and incentivising collection of macroplastics at end of life.

Leakage of macroplastics can be significantly reduced through a combination of: (i) bans on specific single-use plastic items (e.g. plastic cutlery and straws); (ii) elimination of certain packaging types (e.g. polystyrene, PVC); (iii) economic incentives to reduce consumption (e.g. levies on single-use bags and coffee cups); (iv) mandatory measures with regards to plastic packaging design that require design for reuse and recycling, elimination of unnecessary packaging, replacement of non-reusable and non-recyclable packaging and improved recyclability; and (v) measures that incentivise collection (e.g. DRS). We oppose material substitution with “biodegradable” plastics as there are no so-called “biodegradable” plastics that have been conclusively demonstrated to biodegrade fully in the marine environment. They may therefore still function as microplastic pollutants with the same negative impacts on marine and freshwater species.

With regards to microplastics, the following should be considered as part of the strategy:

- A comprehensive ban on all microplastic ingredients used in all products entering drainage systems or discharged directly or indirectly into the aquatic environment, either by design or reasonably foreseeable use.*
- Regulatory measures to eliminate pollution from pre-production plastics (pellets, flakes and powders) given that this is a major source of microplastic pollution and voluntary measures have failed to be adequately implemented.*
- Assessment and quantification of other sources of primary microplastics.*
- Funding support for the development and implementation of solutions to prevent*

microplastics arising from sources such as car tyres and textiles.

Sea-based sources are significant contributors to marine plastic pollution and should be explicitly included within the strategy. The upcoming revision of the PRF Directive should include: (i) harmonisation of cost recovery systems across waste streams and ports, requiring a 100% no special fee system with a deposit-refund or opposite fee; (ii) require payment of fees to cost recovery systems from all vessel types; and (iii) establish measures specific to fishing equipment such as mandatory deposit-refund schemes under extended producer responsibility.

Feedback file: