

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

## **User's data:**

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

## **Feedback:**

*Flexible Packaging Europe represents over 80% in turnover of the European flexible packaging converters.*

*As flexible packaging is predominantly made of plastic films, we welcome this initiative as we have a significant vested interest in ensuring a coherent EU Plastics Strategy (that is also environmentally and economically sustainable) and robust Legislation/Policy to facilitate its safe use.*

*Given our interest is limited to plastics used in flexible packaging, we have consciously limited our input to this part of the plastics considered by the strategy.*

### *Overall approach*

*With respect to plastics used in packaging, these must be assessed relative to the role they provide protecting the product and facilitating Sustainable Consumption and Production.*

*While the highlighted impacts from plastic packaging might appear higher than desired, this needs to be contrasted with the impacts that would arise from next best alternative if substitution would occur. Currently, LCA is the only suitable/credible tool for impact assessment. We can offer this peer reviewed LCA study demonstrating the waste prevention potential and reduced environmental impact if more flexible packaging was used (see attached summary)*

*We also draw your attention to the need for robust indicators to track progress than simplistically monitoring the Recycling Rate of the different packaging materials. One such alternative metric (Resource Efficiency metric taking into account both the overall use of resources throughout the lifecycle and the amount of residual – non recycled – material waste) is explored in a second study which we would be pleased to share with you.*

*We would like the Plastic Strategy to clearly state its core objective which should be to reduce the overall environmental impact of plastics without transferring the*

*impacts to other sectors. This entails first assessing the identified potential solutions, like reuse, compostable, non-fossil raw material, using LCA as the basis for comparison (covering all key environmental impacts – not only marine pollution and GHG emissions) before adoption.*

*In the Plastics Strategy we strongly advocate for the “Collection of ALL Plastic Packaging” in all EU MS for the following reasons:*

- Collection is a pre-requisite for these materials to be available for recycling. If not collected, they cannot be recycled!*
- Why adding cost designing a pack to be recycled if there is still very little chance of it being collected for recycling in many EU countries?*
- Collection will help prevent leakage into the environment*
- The combination of wide spread collection together with measures taken to significantly reduce the export of these materials is necessary to guarantee the quantities of plastic packaging available to be recycled in Europe for those wishing to invest in the infrastructure to recycle them.*

*As input to the 3 issue areas identified in the roadmap:*

*1- High dependence on virgin fossil fuels as feedstocks*

- All of the main plastic types used in flexible packaging can already be produced from bio-based feedstocks and are being produced today. Currently these bio-based plastics are generally more expensive and most LCA's show them to still have less favourable results on main environmental impacts than the fossil fuel derived equivalent. A change in this situation is needed to accelerate their use.*
- Bio-degradable plastics are not a relevant consideration for the majority of plastic packaging applications as they often cannot provide the required functionalities such as barrier needed to protect the filling good. We welcome the proposed development of harmonised EU standards for bio-degradable plastics to provide clarity on when/where they may be relevant.*

*2- Low rates of recycling and re-use of plastics*

- In comparison with other packaging materials (glass, paper and metal), some plastic packaging fractions have only recently been collected for recycling. Most plastic packaging is still not collected in many EU countries. Until this is addressed, the low rate of recycling is unlikely to change. Once collected, it will still take some time for the infrastructure to effectively sort/recycle these materials to develop.*
- Guaranteeing the collection of flex pack would incentivise packaging designers and encourage sorters/recyclers to invest in the technology/infrastructure. EPR is an excellent policy mechanism to realise this.*
- The economics and the environmental benefits of the respective EoL options in all EU MS need to be aligned with and reflect the objectives of the Plastics Strategy and the entire Circular Economy approach of EU institution. “Collection, sorting and recycling” needs to cost less than the respective recovery alternatives which in turn needs to cost less than landfill. The excess revenue from the latter 2 EoL options could be used to create the business case for Collection, Sorting, Recycling. The same logic applies to the exporting of 50% of the plastics. Until this option becomes unattractive economically, it is unlikely to stop. Alternatively, EoL options that are environmentally undesirable, such as landfilling, could be banned.*
- We call for acknowledgement that alternative EoL solutions like W2E will continue*

*to be required into the future – e.g. for the packaging fraction for which these options are simply more sustainable environmentally and economically than recycling.*

### *3- Leakage into the Environment*

- Collection of all Plastic Packaging will help prevent this occurring.*
- We observe from many studies that the leakage of plastic packaging into the environment in Europe is a relatively minor issue compared to other regions and other sources e.g. tyre wear from cars. However, more can and should be done and collection is a good place to start.*

### *CEFLEX project*

*FPE is engaged with more than 30 companies of the flex pack value chain in this project with the vision to make flex pack even more relevant in the new European circular economy.*

### **Feedback file:**

[\*FPE\\_ifeu\\_PreventionStudy\\_exec\\_summary\\_201412.pdf\*](#)