

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

User's data:

- Domain : Company/Business organisation
- Name : Peter Boris Schmitt
- Email : peterboris.schmitt@henkel.com
- Country : Belgium
- Organisation : Henkel AG & Co KG
- Headquarter : Germany
- Register : 13635802880-80
- Size : Large (250 or more)
- Publication : can be published with your personal information

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

Feedback:

Henkel comments as follows:

Objective 2) of the Strategy (low rate of recycling and reuse of plastics) focusses on the production phase ("design for recycling"), whilst the other objectives in the Strategy do not focus on other elements of the value chain. Such approach runs the risk of hindering a value chain, or loop to be closed and thus could impede circularity. Creating more material to recycle by means of design has a nett effect of zero on the environment without recyclers having sufficient technology to process this new material. It might actually even damage the environment. Additional beneficial factors, especially regarding packaging, must be also and equally considered. For example, lightweight packaging that may not be as easy to recycle creates less CO2 to transport and helps to preserve food longer, reducing food waste. Which of these beneficial factors for the environment should prevail?

While Henkel agrees with the Commission that recycling is a key part of becoming more circular, it also believes the sourcing of materials should be seen as of equal importance. Recycling shall not be a goal in itself, but rather one of many options when handling materials efficiently and circular. The Roadmap says that objectives of Plastic Strategy should directly contribute to the implementation of the Circular Economy action plan which has as its objective: a sustainable, low carbon, resource efficient and competitive economy. That does not say anything about how that objective should be reached. Henkel vows for a more holistic, life-cycle view of the plastics value chain targeting resource efficiency gains across the whole value chain.

Henkel would like to remind the Commission that transforming the plastics value chain will be a long-term process, and one that will only be sustainable if industry-driven. All players must play their part in the process in order to truly close the loop. We would welcome a

Strategy where industry has more room to come up with sustainable solutions based on sound business cases and innovation.

There need to be sufficient economic incentives for producers to invest in 'design for recycling'. Consumers are now most concerned (and pay for) durability, ease and weight of a product – not yet for recyclability. This needs to be encouraged and recycling costs need to be factored in through legislation along the whole value chain. Stimuli to change the front- (design) and backend(usage of recycled content) of the circle are needed as well as a deblock of investment for better sorting and recycling processes.

When using the eco-design instrument as a tool to achieve (recycling-)objectives, a close look at available technologies for design and recycling as well as re-use or reparability is needed. Technology neutrality has to be the guiding principle to avoid lock-ins and impede innovation.

In short we summarize our input as follows:

Drivers of a circular plastic economy:

- 1) Packaging design which is recycling friendly based on state of the art sorting and recycling technologies*
- 2) Sorting and recycling technology which is able to treat innovative packaging solution in the process to end up in broadly usable recycled content and which are flexible enough to manage several generations of packaging solutions*
- 3) A market for recycled content for which demand exists (manufacturer/ packaging producer specifications)*
- 4) An incentive system which pushes the front- and backend of the circle by providing bonus for recycling friendly packaging and usage of recycled content.*
- 5) Based on a harmonized way forward to avoid too divers systems in EU which are ending up in to small markets and complex structures*
- 6) Based on a directive which is not too prescriptive to stop innovations*
- 7) Based on solutions(collection systems)for the consumer which are easy to understand*
- 8) Based on the lowest number of exceptions what can be collected and what has to be put in separate stream.*
- 9) Avoid technology lock-ins when using eco-design instruments for plastics recycling especially in the context of complex products consisting of many components (adhesives use in electronics and electrical devices)*

Feedback file: